

Oct 23, 2008

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

Dear Boards Support Section,

I am writing to urge the Board of Game to adopt a more balanced approach to wildlife management in Alaska.

I oppose Proposals 1, 2, 12, 13, 31, 45 and 50. Specifically, I ask that you oppose:

- * Expanding wolf hunting to allow the shooting or trapping of wolves

during the months of May, June or August when young pups are in the den or when pelts are of little worth to the trapper.

- * Expanding wolf hunting as a tool to increase deer, moose or mountain goat populations without strong scientific data indicating that wolves are a leading cause for low populations of big game species. Never cry wolf unless you can prove it!

- * Allowing wolf dens to be disturbed or destroyed under the premise

that it is a traditional harvest method. Unit 19 has an aerial predator control program and a very liberal season and bag limit for wolves. There is no scientific justification to expand predator control to the use of "denning" wolves.

If, as often noted by the Board of Game, current aggressive predator

control programs are effective and sufficient, expansion of any kind is unnecessary. In addition, there is no supporting data that "denning" has ever been a traditional harvest method.

I oppose 49, 51, 52, 53, 54 and 55.

Specifically, I urge you to oppose:

- * Allowing both black and brown bear cubs and/or female sows with cubs to be shot or snared.

- * Allowing bears to be harvested in a den ("denning").

- * Allowing bear hides, skulls, or claws to be sold for profit.

- * Permitting the same-day aerial shooting of bears.

These measures are all extreme and unnecessary.

Shooting female bears with cubs or the cubs themselves is strongly opposed by the public and is not warranted. Unit 20E already has an aggressive predator control program and sufficiently liberalized bear harvest regulations.

Selling of bear hides commercializes the resource and does not increase

bear harvest goals as noted in Unit 16's attempt to increase black bear harvest by allowing the sale of bear parts. And the lack of effective

enforcement regulations and insufficient number of enforcement officers will only encourage poaching in other areas of the state.

Snaring of bears is strongly opposed by the public, is inhumane, and allows for excessive lethal snaring of dogs and non-targeted big game animals such as moose, caribou, or sheep.

Likewise, killing any bear in its den, including female sows with newborn cubs, is strongly opposed by the public and is not warranted.

No scientific data supports the need for "denning" of bears in any of the Game Management Units in Alaska and there is no reliable data to confirm denning has ever been a traditional method of harvest. Furthermore, the proposed use of artificial lights certainly could not be construed as a traditional hunting tool.

In conclusion, I strongly believe that predator management decisions should be scientifically based and supported by our nationally-recognized scientific organizations that have repeatedly

called on the Board of Game to do a better job when developing Alaska's predator control programs.

Thank you for considering my comments.

Ms. Donna Bell
2350 Old Lawson Creek Rd

COMMENT#

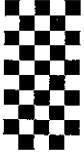
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RECEIVED TIME OCT. 23. 2:39PM

Douglas, AK 99824-5100

RECEIVED TIME OCT. 23. 2:39PM

COMMENT# 1



Oct 23, 2008

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

Dear Boards Support Section,

Attention: Board of Game

Re: upcoming Board of Game Fall 2008, Southeast Proposals.

I am deeply concerned and have been for a long time that the Board of Game DOES NOT represent the majority of Alaskans when it comes to wildlife conservation and management. It's time for a more balanced wildlife management in Alaska.

As a long time Alaskan and an avid hiker and photographer, my comments concerning the BOG's aggressive predator control programs are as follows:

I urge you to oppose BOG's Proposals 1, 2, 12, 13, 31 and specifically, 49 which would allow both black and brown bear cubs and/or mother bears to be shot or snared during denning. And I oppose bear parts being sold for profit and same day aerial killing. These measures are extreme and inhumane. And, for what purpose?

I oppose Proposal 54 which among other detrimental outcomes would lead to incidental kills of other wildlife.

I oppose Proposal 13 designed to extend season (only July closed) for taking wolves leading to wolf pups being orphaned and dying from starvation.

I strongly urge you to oppose Proposals 50, 55 re: wolf denning and 51 and 52 re: bear denning. These four proposals allow for the unethical and outlawed practice of killing infant wolves and bears in their den. When pups are in the den the adult fur is useless. The majority of Alaskans would be horrified by such an arcaic, barbaric, sinister undertaking. It's unethical and inhumane. Certainly it is not a Native Alaskan traditional practice. Alaska predator management control decisions should be based on sound scientific research supported by nationally recognized conservation organizations. And, the whole process should be transparent and accountable to the public.

Sincerely,
Penelope Wells
P.O. Box 240454
Anchorage, AK 99524-0454

Thank you for considering my comments.

Ms. Penelope Wells
PO Box 240454
Anchorage, AK 99524-0454

COMMENT#

2

RECEIVED TIME OCT. 23. 9:08PM

Oct 24, 2008

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

Dear Boards Support Section,

I am writing to urge the Board of Game to adopt a more balanced

approach to wildlife management in Alaska. Like several other people I know - the poor and misleading way the last proposition was worded led to erroneous messages from the public and an unfair advantage at the polls. Many, many Alaskans are tired and against Predator control in this State. why don't we just sent all the roadkilled and RR killed moose to the Bush for those who have selfishly depleted the hunting cooridors and feed their freezer burned game to the dogs each season.

I lived in McGrath and everybody was to get their moose from a boat and hence the over hunting. Plus - everyone with some environmental sense

(I am a professional Forester) can see the bears are taking most all of the calves - so get off the wolf hunting and start managing the highways in a balanced conservative, resourceful way. I think the whole state F&G is an unwilling environmental partner with other

professional wildlife managers and is turning Alaska into a testosterone driven game for the big boys. Be real - play fair and listen to the people and the tourists who have to pay an arm & a leg at the grocery stores. We have a right to view predators and support their rightful "denning" in this their great State - as well!

I oppose Proposals 1, 2, 12, 13, 31, 45 and 50. Specifically, I ask that you oppose:

* Expanding wolf hunting to allow the shooting or trapping of wolves

during the months of May, June or August when young pups are in the den or when pelts are are of little worth to the trapper.

* Expanding wolf hunting as a tool to increase deer, moose or mountain goat populations without strong scientific data indicating that wolves are a leading cause for low populations of big game species. Never cry wolf unless you can prove it!

* Allowing wolf dens to be disturbed or destroyed under the premise

that it is a traditional harvest method. Unit 19 has an aerial predator control program and a very liberal season and bag limit for wolves. There is no scientific justification to expand predator control to the use of "denning" wolves.

If, as often noted by the Board of Game, current aggressive predator

control programs are effective and sufficient, expansion of any kind is unnecessary. In addition, there is no supporting data that "denning" has ever been a traditional harvest method.

I oppose 49, 51, 52, 53, 54 and 55.

Specifically, I urge you to oppose:

* Allowing both black and brown bear cubs and/or female sows with cubs to be shot or snared.

* Allowing bears to be harvested in a den ("denning").

* Allowing bear hides, skulls, or claws to be sold for profit.

* Permitting the same-day aerial shooting of bears.

These measures are all extreme and unnecessary.

Shooting female bears with cubs or the cubs themselves is strongly opposed by the public and is not warranted. Unit 20E already has an aggressive predator control program and sufficiently liberalized bear harvest regulations.

Selling of bear hides commercializes the resource and does not increase

bear harvest goals as noted in Unit 16's attempt to increase black bear harvest by allowing the sale of bear parts. And the lack of effective

enforcement regulations and insufficient number of enforcement officers will only encourage poaching in other areas of the state.

COMMENT#

3

RECEIVED TIME OCT. 24. 11:10AM

Snaring of bears is strongly opposed by the public, is inhumane, and allows for excessive lethal snaring of dogs and non-targeted big game animals such as moose, caribou, or sheep.

Likewise, killing any bear in its den, including female sows with newborn cubs, is strongly opposed by the public and is not warranted. No scientific data supports the need for "denning" of bears in any of the Game Management Units in Alaska and there is no reliable data to confirm denning has ever been a traditional method of harvest. Furthermore, the proposed use of artificial lights certainly could not be construed as a traditional hunting tool.

In conclusion, I strongly believe that predator management decisions should be scientifically based and supported by our nationally-recognized scientific organizations that have repeatedly

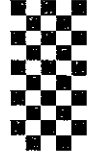
called on the Board of Game to do a better job when developing Alaska's predator control programs.

Thank you for considering my comments.

Mrs. Judith Reese
PO Box 1171
38160 Sandlin Dr
Sterling, AK 99672-9506

COMMENT# 3

RECEIVED TIME OCT. 24. 11:10AM



Oct 23, 2008

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

Dear Boards Support Section,

I am writing to urge the Board of Game to adopt a better approach to wildlife management in Alaska.

I oppose Proposals 1, 2, 12, 13, 31, 45, 49, 50, 51, 52, 53, 54, and 55. I support Proposals 46 and 22.

Basically I disapprove of denning of wolves and bears, and the snaring of bears near trails frequented by humans and dogs. The wolf season should not be opened during the summer, when there pelts are not worth sewing. I am against expanding wolf hunting to manage ungulate populations. And, I am also against aerial predator hunting. Thank you for your consideration.

Thank you for considering my comments.

Ms. Beverly Minn
500 Lincoln St Unit B9
Sitka, AK 99835-7655

COMMENT#

4

RECEIVED TIME OCT. 23. 2:11PM

Alaska Wildlife Alliance
P.O.Box 202022
Anchorage, AK 99520

To: Board of Game
RE: Positions on SE AK Regulation Proposals

October 21, 2008

Dear Chairman Judkins and Board of Game Members,

Alaska Wildlife Alliance, { AWA }, is an Alaskan based non-profit organization which has advocated for and protected Alaskan wildlife since its founding in 1978. We believe that wildlife is a valued natural resource and that it should be managed using current scientific findings. We also believe that Alaska's wildlife should be managed for all user groups.

Following are our positions on the 56 regulation proposals that were submitted for the SE AK Board of Game meeting. We appreciate your time and attention to our assessments of these proposals.

Sincerely,

Alaska Wildlife Alliance and AWA Board of
Directors

*Jenny Pursell, AWA
Board member*

Proposal #1: OPPOSE- This proposal would lengthen the wolf trapping season in Unit 1A by ten days, so as to provide an earlier opening date. Currently the wolf trapping season opens Nov. 10 and ends April 30. There is no bag limit on trapping of wolves, although there is a bag limit of 5 wolves for hunting wolves in Unit 1A. We do not know what the department's position will be on this proposal. This proposal and Proposal #2 are both interrelated. Proposal #2 deals with the hunting seasons for wolf in Unit 1A. The goal of both proposals appears to be to increase the trapping and hunting of wolves so as to reduce their numbers. The current management objective for the annual taking of wolves is 20, and the proponent wants to increase that objective, and the take to 30 per year. Not biological justification is offered for either proposal.

Proposal #2: OPPOSE- The hunting season for wolves in Unit 1A is currently Aug. 1- April 30, and the bag limit 5. This proposal would remove the bag limit entirely. As discussed in regard to proposal #1, there is not justification for this proposal.

Proposal #3: SUPPORT- This proposal to conserve the deer population on the Cleveland Peninsula is important and AWA supports it.

Proposal #4: OPPOSE- This proposal would increase the bag limit for mountain goats from one to two in Unit 1A. The proponent's goal is to make it more cost effective to fly into high mountain lakes. The proponent states: "With a two goat bag limit maybe a few more people would go." This isn't a reason that is based on the health of wildlife populations, which should be the management objective.

COMMENT#

5

Proposal 5: OPPOSE- This proposal would relax regulations that were set into place by the ADF&G to carefully regulate black bear baiting on Prince of Wales Island. The department and many local residents have concerns re the apparent decreasing population of black bear on the island.

Proposal 6: SUPPORT- This proposal would eliminate the fall sport hunt of black bears in Unit 2. The proponent is Karen Petersen, and she states that she travels on a weekly basis all over POW, and that she sees far fewer bears than in the past due to over hunting by out of state sport hunters. Her proposal would not eliminate subsistence hunters in the fall, or the general hunt in the spring.

Proposal 7: SUPPORT- This proposal {like proposal 6} is by two individuals – Glen and Kay Keller- who are concerned about over hunting on POW. They would close the fall bear hunting season only on the north end of POW. They report seeing as many as ten orphaned cubs a year and believe the bear population has dropped dramatically.

Proposal 8: SUPPORT BUT WITH ADDITIONAL RESTRICTIONS- This proposal is by the department. It would shorten the marten season for residents to 15 days in Dec.- close the non-resident trapping season , and create a Kuiu Island Management Area that is closed to the use of motorized land vehicles for trapping marten. Kuiu Island is a large island lying roughly between Petersburg and Sitka. It is in Unit 3. The Department's biologists report that there are two types of endemic marten in Alaska, namely *Martes Americana* and *Martes caurina*, and that these two types are as different as brown bears versus polar bears. The biologists report that *Martes caurina* inhabit only 2 islands in the archipelago, Admiralty and Kuiu, and that there is very substantial evidence that *Martes caurina* is on the verge of extinction on Kuiu. The department's exact terminology is as follows: "Allowing the harvest to continue under present regulations despite such low population levels could result in an unsustainable *Martes caurina* population from Kuiu Island. The Dept's comments also indicate that it is the dept's opinion that closing the marten season entirely "may eventually be a necessary step..." The Dept. should not gamble on the continued survival of this species in SE AK. Kuiu should be closed to all marten trapping, entirely, with no subsistence or resident trapping season, until such time as the threat to the survival of this species is removed. That is what our constitution and statutes require. Conservation not extinction.

Proposal 9: NO POSITION- This proposal, by an individual, would modify in Unit 3 the season for elk so as to provide for an alternative bow and rifle season for elk on Etolin Island. It appears to be an allocation issue between different user groups.

Proposal 10: OPPOSE- This is a proposal by the Dept. concerning antler restrictions for moose in Units 1B, 1C, and 3. In essence, the Dept. is making the proposal because the Dept. is concerned that the current rules overly restricting the taking of large bull moose. Currently spike fork bulls, and large bulls with 50 inch spreads or 3 brow tines on one side, can be taken. The proposal would loosen the restriction to allow the taking of large bulls with two brow tines on each side. Common sense dictates the conclusion that focusing of hunters on very large moose creates an artificial selection criteria, altering the

COMMENT#

5

gene pool. While the current regulation is bad, biology suggests that the proposal will make things worse. These complex restrictions allowing a trophy, and should be replaced with permit systems allowing the individual hunter lucky enough to win a permit, greater latitude in choosing his/her moose.

Proposal 11: OPPOSE- This proposal is essentially the same as proposal #10, but by an individual. It should not pass for the same reasons expressed in regard to Proposal #10.

Proposal 12: OPPOSE- This proposal would extend the wolf hunting season by 1 month, until May 31, in Unit 3. SE Alaska wolves are pupping during this time and it would be inhumane to kill adults when pups are reliant on them for survival. In addition the mortality of pups would add to the overall mortality of wolves in Unit 3 which may be detrimental to a healthy predator/prey population.

Proposal 13: OPPOSE- The statement that 'over population of wolves in Unit 3 is limiting moose, deer, and black bear populations' is anecdotal. To lengthen the wolf hunting season to June 30 is not scientifically based; therefore making this proposal unadvisable.

Proposal 14: NO POSITION- This proposal would clarify the boundaries of the Blind Slough Closed Area in Unit 3. It is by the Dept. and is made for clarification purposes.

Proposal 15: OPPOSE- This proposition to extend beaver trapping by 3 weeks in Unit 1C is not warranted as there are no bag limits on beaver during the season and an extended season could be detrimental to the population.

Proposal 16: Oppose- This proposal would extend the beaver hunting/trapping season by 4.5 months, Sept. 1-June 30, in Unit 1D. This extension is extreme, particularly because there are not bag limits on beaver during the season. This extension is likely to be detrimental to the population.

Proposal 17: OPPOSE- This proposition would allow 'bounties' on beaver in Unit 1D. Bounties are historically difficult to regulate and when instituted have had dire consequences in eliminating/decreasing various species populations. Another reason to oppose this proposition is to ask the question: 'Who will pay for such beaver bounties?'

Proposal 18: OPPOSE- This proposal, by Barry Brokken, would lengthen the trapping season for mink and weasel in Unit 1C. The only purpose is "increased profit". No biological justification is provided, and its impact on these species is unknown. The current season is Dec. 1- Feb. 15, i.e. two and a half months. The proponent would have the season open on Nov. 10, which would be a substantial expansion of the season. There is no bag limit. Two and a half months should be sufficient for profit making by trappers of mink and weasel in Unit 1C.

Proposal 19: OPPOSE- This proposal by, Barry Brokken, would extend the season for trapping land otter in Unit 1C. The purpose is "increased profit" according to the

COMMENT#

5

proponent. The current season is Dec. 1- Feb. 15. There is no bag limit. The proposal would have the season open earlier, on Nov. 10. Two and a half months should be enough for profit making by this individual.

Proposal 20: OPPOSE- This proposal by Barry Brokken would extend the season for trapping marten in Unit 1C. the purpose is "increased profit". The current season is Dec. 1 – Feb. 15. There is not bag limit. In light of the near extinction of *Martes caurina* on Kuiu Island in Unit 3, the Dept. should reject proposals to increase marten trapping throughout SE AK, and instead consider restricting marten trapping until biologists have a better understanding of the viability of these populations throughout SE AK.

Proposal 21: OPPOSE- This proposition would create a public safety issue i.e. it would allow for traps to be set close to trails that are currently closed to trapping.

Proposal 22: SUPPORT- This proposal would institute safety measures on heavily used recreational trails, currently open to trapping, in Unit 1C. Public safety must come first in heavily used recreational areas.

Proposal 23: SUPPORT- This proposal would ensure that cream-colored black bears would be protected from hunting under enforceable regulations in Unit 1D. These bears are an important wildlife resource to protect as they provide appreciation/enjoyment for All user groups.

Proposal 24: OPPOSE- This proposal would extend the spring brown bear hunting season by 2 weeks in Unit 1C. Bears are vulnerable to hunters in the spring as they frequent intertidal/coastal areas where they can be easily seen and shot. This season extension is not congruent with brown bear conservation.

Proposal 25: SUPPORT-

Proposal 26: OPPOOSE- The plain language of this proposal suggests that a new goat area would be opened up in SE for purposes of an archery hunt. The language says that there will be a " loss of potential hunting area for bow hunters ". However, it also says that there is no existing goat hunt with bows in this area right now. Therefore, while it may not be a gain for bow hunters, it is not a loss. If there is no open season there now, there is likely a reason for this. Biologists likely recommended that there be no open season. Is there a biological reason that there is no open season there at the present time? The Board of Game should examine why there is no open season and look at the history of it and determine whether or not ther could even be a season there- can the population sustain the harvest?

Proposal 27: NO POSITION- The AWA takes no position on this proposal due to a lack of information in this written proposal.

Proposal 28: SUPPORT-

COMMENT# 5

Proposal 29: SUPPORT-

Proposal 30: OPPOSE- The Board of Game has the legal authority to establish a Tier II program on state lands. The author of this proposal wants to change the hunting regime from a Tier II system where you have to consider subsistence eligibility and criteria, to open the area up to anyone. Unless biological reasons have changed, Mr. Werner provides no biological justification for the proposal. His proposal is not based on anything scientific. There is no biological justification to change the hunt.

Proposal 31: OPPOSE- Extending the wolf hunting/trapping season in Unit 1D by 2 weeks, until May 15, because of the belief that the current wolf population could be detrimental and could decimate the moose herd- is anecdotal. There must be scientifically based data to support such a proposal. In addition, extending the season into May will cause more wolf pup mortality as a result of killing adult wolves who they rely upon for their survival.

Proposal 32: OPPOSE- This proposal concerns incidental catches where the wolf and wolverine seasons open up earlier than the lynx season. There is no biological justification identified for making this change. There has been a past, statewide effort to look at the lynx seasons and more conservatively manage lynx because of their status. ADF&G went to a more conservative season. Mr Newlun is recommending going in the opposite direction. The concern is with the lows in the snowshoe hare cycle and the potentiality that lynx hunting needs to be closed where the cycle of hares is low.

Proposal 33: OPPOSE- Tags were instituted in 2002. There was a good reason for tags because there had been a history of problems with traps set illegally. Without a tag, it is impossible to prove who illegally set a trap. The Board went to trap tag requirements in certain areas of the State. While some trappers have opposed it, they have mainly opposed it because they are concerned that they will be caught doing something they should not be doing and for which they can be proven culpable. They have not enjoyed this vulnerability. They have on worries or concerns if they comply with the law.

Proposal 34: SUPPORT-

Proposal 35: OPPOSE- The AWA opposes this for reasons cited in its opposition to Proposal No.33

Proposal 36: SUPPORT-

Proposal 37: NO POSITION- The AWA sees some benefit to this proposal. Requiring registration for black bear hunts provides more scrutiny, vigilance, and data. Persons would be required to come into a department office and register for the hunt. This can, however, create a heavy workload for fish and game personnel. The AWA does not actively oppose or support this proposal.

Proposal 38: SUPPORT-

COMMENT#

5

Proposal 39: SUPPORT-

Proposal 40: SUPPORT- This proposal limits bear baiting to registered archers only, of which there are far less than rifle hunters in the state. This is congruent with black bear conservation.

Proposal 41: SUPPORT- This proposal would enable the Dept. to implement important and necessary permit conditions to regulate hunting activity associated with bear baiting.

Proposal 42: OPPOSE- This proposal would allow anyone to call their position in the field into the Dept. without any way for the Dept. to check the legality of the caller.

Proposal 43: NO POSITION

Proposal 44: OPPOSE- This proposal is not conducive to the conservation of the moose herd in the Stikine River hunting area.

Proposal 45: OPPOSE- This proposal to extend the wolf hunting season by 1 month in Units 1 and 2, until May 31, is unwarranted and would be inhumane to pups born in the spring who are reliant on adults for their survival.

Proposal 46: SUPPORT- This proposal that would decrease the wolf hunting season by 2 months in Units 1, 3, 4, and 5 is warranted. The season would revert back to Sept. 1- March 31 versus the current season which is Aug. 1- April 30. Wolves killed in Sept. and April have less quality/value hides due to rubbing and being un-prime fur therefore continuing a lengthened season is not beneficial to trappers desiring maximum hide values. In addition pups who are orphaned in summer and early fall will continue to starve and die inhumanely unless the season is shortened. In addition it is in late April when female wolves are pregnant and near full term. It is inhumane to kill them and not sound conservation for a species with big game and furbearer values.

Proposal 47: NO POSITION

Proposal 48: SUPPORT

Proposal 49: OPPOSE- This proposal would allow the snaring of bears, killing of cubs, and the killing of females with cubs. This allowance would legalize current illegal hunting methods and is not acceptable for that reason.

Proposal 50: OPPOSE- This proposal would allow 'denning' which is an illegal hunting practice and therefore should remain so.

COMMENT#

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Proposal 51: OPPOSE- This proposal would allow denning and the killing of any black bear regardless of age or gender. This is currently an illegal hunting practice and should therefore remain so.

Proposal 52: OPPOSE- This proposal would allow an illegal hunting practice to become legal. This proposal should not become an exception to hunting practices.

Proposal 53: OPPOSE- We oppose this proposal for the same reasons that we opposed proposal #51, in addition we oppose it because it promotes artificial light i.e. 'jacklighting'.

Proposal 54: OPPOSE- We believe that this is an all out war on both brown and black bears and therefore do not support a proposal that ignores hunting ethics and bear conservation practices.

Proposal 55: OPPOSE- We oppose this proposal as it would allow wolf and bear 'denning' which essentially promotes the indiscriminate killing of both species.

Proposal 56: OPPOSE- This proposal would create special privileges in hunting not extended to other disabled hunters. Hunting is not intended as an award for military duty.

COMMENT#

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United States Department of the Interior

FISH AND WILDLIFE SERVICE

1011 E. Tudor Rd.
Anchorage, Alaska 99503-6199

RECEIVED
OCT 16 2008
BOARDS

IN REPLY REFER TO:

OSM/8105/BOG/CA

OCT 16 2008

Mr. Cliff Judkins, Chair
Alaska Board of Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Judkins:

The Alaska Board of Game is scheduled to meet November 7-11, 2008, to deliberate proposals concerning changes to regulations governing hunting and trapping of wildlife for the Southeast Region. We have reviewed the 56 proposals the Board will be considering at this meeting.

The U.S. Fish and Wildlife Service, Office of Subsistence Management, working with other Federal agencies, has developed preliminary recommendations on those proposals that have potential impacts on both Federal subsistence users and wildlife resources. Our comments are enclosed.

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues. Please contact Chuck Ardizzone, Wildlife Liaison, at 907-786-3871, with any questions you may have concerning this material.

Sincerely,

Peter J. Probasco,
Assistant Regional Director

Enclosure

cc: Denby Lloyd, ADF&G
Mike Fleagle, Chair, FSB
Kristy Tibbles, Board Support Section
Tina Cuning, ADF&G
Nancy V. Hendrickson, ADF&G
Interagency Staff Committee
Chuck Ardizzone, OSM

COMMENT# 6

RECOMMENDATIONS

ALASKA BOARD OF GAME PROPOSALS

Southeast Alaska Region

November 7-11, 2008

Juneau, Alaska

U.S. Fish and Wildlife Service Office of Subsistence Management (OSM)

Table of Contents

Proposal	Page Number
Proposal 5.....	3
Proposal 8.....	3
Proposal 15.....	4
Proposal 16.....	5
Proposal 18.....	5
Proposal 19.....	6
Proposal 20.....	7
Proposal 42.....	7

Proposal 5—5 AAC 92.044. **Permit for hunting black bear with the use of bait or scent lures, and 92.052. Discretionary permit hunt conditions and procedures.** Create a special provision for Unit 2 providing the opportunity to obtain bear bait permits by mail from ADF&G, and make voluntary the requirement to provide exact location of bait sites.

Current Federal Regulation:

Black bear—General provisions

No person may establish a black bear bait station unless they first register their site with ADF&G.

Black bear—Special provisions

Unit 2 Bait may be used to hunt black bear.

Apr. 15--June 15

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife Federally qualified subsistence users are required to register their bait site with ADF&G. Federal regulations are not clear on how that registering should occur. Allowing the issuance of permits via the mail seems to be a reasonable accommodation.

Federal Position /Recommended Action: The OSM recommendation is **neutral on** the proposal.

Rationale: The purposes of the State regulations are to minimize conflicts with other people and to reduce the amount of trash left at sites. These are also requirements of Federal regulations (though not identified above). The State believes there is a need to have exact locations of baiting stations in order to enforce the regulations; this same Federal need is implied by Federal regulations. The State plans to add clarity to the bear baiting regulations with action on their proposal #41. Federal regulations require the hunter to “register” but do not specifically require a permit. The portion of this proposal providing flexibility to issue permits by mail would be beneficial to the Federally qualified subsistence user.

Proposal 8—5 AAC 84.270(6). **Furbearer trapping.** For Kuiu Island in Unit 3, shorten the marten trapping season for residents, close the nonresident marten trapping season, and create a Kuiu Island Management Area that is closed to the use of motorized land vehicles for trapping marten.

Current Federal Regulation:

Marten

Units 1, 2, 3, and 4 No limit.

Dec. 1–Feb. 15

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: Restricting access may detrimentally affect subsistence users trapping under State regulations by making it more difficult to run traplines in this area. This will not affect Federally qualified subsistence users trapping under Federal regulations. Shortening the trapping season for residents trapping under State regulation and closing the area to nonresident trapping may make a few more marten available to Federally qualified subsistence users. However most use of the area is already by Federally qualified users.

Federal Position /Recommended Action: The OSM recommendation is **neutral** on the proposal.

Rationale: Adoption of this proposal does not directly affect Federally qualified subsistence users trapping under Federal regulations, although the result could be slightly more marten available for Federally qualified subsistence users. There is currently a very low level of trapping. It is not clear whether there is a conservation concern; the Federal program would need to evaluate any proposals submitted to the Federal Subsistence Board to align with State regulations, should this proposal be adopted by the Board of Game.

Proposal 15—5 AAC 84.270. Furbearer trapping. Lengthen the beaver trapping season in Unit 1C from Dec. 1–May 15 to Nov. 10–May 15.

Current Federal Regulation:

Beaver—Trapping

Unit 1C No limit

Dec. 1–May 15

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: If the beaver trapping season is extended as proposed, Federally qualified subsistence users trapping under State regulations would have additional opportunity to harvest beaver for both fur and food. No adverse impacts to the resource are anticipated as a result of adoption of the proposed regulatory change.

Federal Position /Recommended Action: The OSM recommendation is **to support** the proposal.

Rationale: There are no conservation concerns for the beaver population in Unit 1. Because there is currently minimal take of beaver in Unit 1 this proposal would not adversely affect the population. The beaver season opens by November 10, or earlier, under State regulations in all units except in units 1-4. In addition, the fur of this species

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: Restricting access may detrimentally affect subsistence users trapping under State regulations by making it more difficult to run traplines in this area. This will not affect Federally qualified subsistence users trapping under Federal regulations. Shortening the trapping season for residents trapping under State regulation and closing the area to nonresident trapping may make a few more marten available to Federally qualified subsistence users. However most use of the area is already by Federally qualified users.

Federal Position /Recommended Action: The OSM recommendation is **neutral** on the proposal.

Rationale: Adoption of this proposal does not directly affect Federally qualified subsistence users trapping under Federal regulations, although the result could be slightly more marten available for Federally qualified subsistence users. There is currently a very low level of trapping. It is not clear whether there is a conservation concern; the Federal program would need to evaluate any proposals submitted to the Federal Subsistence Board to align with State regulations, should this proposal be adopted by the Board of Game.

Proposal 15—5 AAC 84.270. Furbearer trapping. Lengthen the beaver trapping season in Unit 1C from Dec. 1–May 15 to Nov. 10–May 15.

Current Federal Regulation:

Beaver—Trapping

Unit 1C No limit

Dec. 1–May 15

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: If the beaver trapping season is extended as proposed, Federally qualified subsistence users trapping under State regulations would have additional opportunity to harvest beaver for both fur and food. No adverse impacts to the resource are anticipated as a result of adoption of the proposed regulatory change.

Federal Position /Recommended Action: The OSM recommendation is **to support** the proposal.

Rationale: There are no conservation concerns for the beaver population in Unit 1. Because there is currently minimal take of beaver in Unit 1 this proposal would not adversely affect the population. The beaver season opens by November 10, or earlier, under State regulations in all units except in units 1-4. In addition, the fur of this species

is prime by this date. Note: if the Board adopts this change, the Federal Subsistence Board would need to take parallel action in order for this changed season to be applicable to Federally qualified subsistence users trapping under Federal regulation.

Proposal 16—5 AAC 84.270. Furbearer trapping, and 85.060 hunting seasons and bag limits for beaver. Modify the hunting and trapping seasons for beaver in Unit 1D so that both seasons run from Sept. 1 to June 30, with a trapping license required.

Current Federal Regulation:

Beaver—Trapping
Unit 1D No limit

Dec. 1–May 15

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: If the beaver trapping season is extended as proposed, Federally qualified subsistence users trapping under State regulations would have additional opportunity to harvest beaver for both fur and food. No adverse impacts to the resource are anticipated as a result of adoption of the proposed regulatory change.

Federal Position /Recommended Action: The OSM recommendation is to **support** the proposal.

Rationale: There are no conservation concerns for the beaver population in Unit 1. Because there is currently minimal take of beaver in Unit 1, this proposal would not adversely effect the population. The beaver season opens by November 10, or earlier, under State regulations in all units except in units 1-4. In addition, the fur of this species is prime by this date. Note: if the Board adopts this change, the Federal Subsistence Board would need to take parallel action in order for this changed season to be applicable to Federally qualified subsistence users trapping under Federal regulation.

Proposal 18—5 AAC 84.270. Furbearer trapping. Lengthen the trapping season for mink and weasel in Unit 1C from Dec. 1–Feb. 15 to Nov. 10–Feb. 15.

Current Federal Regulation:

Mink and weasel
Unit 1C No limit.

Dec. 1–Feb. 15

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: The proposal would provide Federal subsistence users trapping under State regulations additional opportunity to harvest mink and weasel. No adverse impacts to the resource are anticipated as a result of adoption of the proposed regulatory change.

Federal Position /Recommended Action: The OSM recommendation is to **support** the proposal.

Rationale: There are no conservation concerns for the mink and weasel populations in Unit 1. Because there is currently minimal take of mink and weasel in Unit 1 this proposal would not adversely affect the populations. Currently, mink and weasel trapping is allowed under both State and Federal regulations from either Nov. 1 or Nov. 10 throughout Alaska except for in Units 1-4, where mink and weasel trapping begins on Dec. In addition, the fur of this species is prime by this date. Note: if the Board adopts this change, the Federal Subsistence Board would need to take parallel action in order for this changed season to be applicable to Federally qualified subsistence users trapping under Federal regulation.

Proposal 19—5 AAC 84.270. Furbearer trapping. Lengthen the river otter season in Unit 1C from Dec. 1–Feb. 15 to Nov. 10–Feb. 15.

Current Federal Regulation:

River otter

Unit 1C	No limit.	Dec. 1–Feb. 15
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Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: The proposal would provide Federal subsistence users trapping under State regulations additional opportunity to harvest river otter. No adverse impacts to the resource are anticipated as a result of adoption of the proposed regulatory change.

Federal Position /Recommended Action: The OSM recommendation is to **support** the proposal.

Rationale: There are no conservation concerns for the river otter population in Unit 1. Because there is currently minimal take of river otter in Unit 1, this proposal would not adversely affect the population. Currently, river otter trapping is allowed under both State and Federal regulations from either Nov. 1 or Nov. 10 throughout Alaska except for in Units 1-4, where the river otter trapping season begins on Dec. 1. In addition, the fur of

this species is prime by this date. Note: if the Board adopts this change, the Federal Subsistence Board would need to take parallel action in order for this changed season to be applicable to Federally qualified subsistence users trapping under Federal regulation.

Proposal 20—5 AAC 84.270. Furbearer trapping. Lengthen the marten season in Unit 1C from Dec. 1–Feb. 15 to Nov. 10–Feb. 15.

Current Federal Regulation:

Marten

Unit 1C

No limit.

Dec. 1–Feb. 15

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: The proposal would provide Federal subsistence users trapping under State regulations additional opportunity to harvest marten. No adverse impacts to the resource are anticipated as a result of adoption of the proposed regulatory change.

Federal Position /Recommended Action: The OSM recommendation is to **support** the proposal.

Rationale: There are no conservation concerns for the marten population in Unit 1. Because there is currently minimal take of marten in Unit 1, this proposal would not adversely affect the population. Currently, marten trapping is allowed under both State and Federal regulations from either Nov. 1 or Nov. 10 throughout Alaska except for in Units 1-4, where the marten trapping season begins on Dec. 1. In addition, the fur of this species is prime by this date. Note: if the Board adopts this change, the Federal Subsistence Board would need to take parallel action in order for this changed season to be applicable to Federally qualified subsistence users trapping under Federal regulation.

Proposal 42—5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures, and 92.052. Discretionary permit hunt conditions and procedures. In Units 1–5, after you have registered your bear bait location in person with ADF&G and wish to relocate the bait, you can call in, rather than report in person the new GPS coordinates to the local office of ADF&G during normal business hours.

Current Federal Regulations:

Black bear—General provisions

No person may establish a black bear bait station unless they first register their site with ADF&G.

Black bear—Special provisions

Units 1A, 1B, 1D, 2, 3, and 5 Bait may be used to hunt black bear. Apr. 15–June 15

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: Federally qualified subsistence users are required to register their bait site with ADF&G. Federal regulations are not clear on how that registering should occur. Allowing contact via telephone seems to be a reasonable accommodation.

Federal Position /Recommended Action: The OSM recommendation is **neutral** on the proposal.

Rationale: Registering a site should be as simple as possible for Federally qualified subsistence users, while meeting the managers' need to know the exact location of the bait site for enforcement and public safety purposes. (Also see comments on **proposal #5**.) Registering by phone is appropriate. However, this proposal also refers to the need to register in person with ADF&G. That should not be necessary for the Federally qualified subsistence user. For example, if a Federally qualified subsistence user lived at the north end of Prince of Wales Island off the road system, they should not be required to travel by boat, plane and/or long vehicle drive to the ADF&G office in Craig in order to register. That would impose great expense and as much as a two day trip.

Theresa Tavel
245 Irwin Street ~ Juneau, AK 99802
(907) 463-3372 ~ tatavel@acsalaska.net

RECEIVED
OCT 21 2008
BOARD

Attn: BOG COMMENTS
Alaska Department of Fish and Game
Boards Support Section
P. O. Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094

October 20, 2008

Proposal 22: 5 AAC 92.550, Areas Closed to Trapping

Dear Board of Game,

Thank you for your consideration at this meeting of restrictions on trapping on recreational trails in Juneau proposed by the State Parks Advisory Board.

I am a personal friend of someone whose dog was caught in a wolf trap on Juneau's Boy Scout Camp trail several years ago. Fortunately this dog did not die from the injuries or an inability to quickly respond to the situation. There have been other dogs in Juneau who have not been as lucky. I also am a dog owner who frequents this trail and many other Juneau area trails.

I very much appreciate your consideration of the issue, and I would ask each of you to vote in support of modifying the areas closed to trapping in Unit 1C to include the recreational trails listed in the proposal (Amalga, Auke Nu, Eagle Glacier, Point Bridget, and Salmon Creek trail).

Hiking with family and friends is an ever increasing popular activity in Juneau. Public use of these trails is growing. I believe adding these trails would be an important benefit to the community, and would not have a significant adverse impact on trappers. Although it may be an inconvenience to move trapping to other trails, continued trapping on these public access trails will inevitably lead to further trapping of personal pets, resulting in injury or death for these animals.

Thank you for your consideration of this matter.

Sincerely,



Theresa Tavel

COMMENT# 7



CRYSTAL IMAGES

Photography and Publishing

KATHLEEN M. K. MENKE

PO Box 781 or 515 Mud Bay Rd.

Haines, Alaska 99827

Website: www.akmk.com

E-mail: ci@akmk.com

Phone/Fax: (907) 766-3517

October 20, 2008

Attn: BOG Comments
Alaska Department of Fish and Game
Boards Support Section
PO Box 11526
Juneau, Alaska 99811-5526
FAX: 907-465-6094

Dear Board of Game:

I am a 60-year old, 14-year resident of Haines. I am an occasional hunter and regular fisherperson and forager who makes my living from photography and publishing, as well as part-time home health care within the Haines community. I appreciate the opportunity to comment on the proposals before you this autumn. The following are my specific comments on specific proposals.

Proposal #16. Unit 1D. Beaver season will be open to both hunting and trapping from Sept. 1 to June 30.

This proposal is not well documented. The benefits of beaver activity are ignored. Beavers in the Chilkat Valley provide increased rearing habitat for coho in both the Chilkoot and Chilkat watersheds, as well as provide for increased willow growth and improved moose habitat. An all out slaughter of beavers in the Chilkat Valley is not warranted. Fish and Game should reject this proposal. I would suggest that if there are specific problems in specific areas that these areas be named and the problem better documented. Alternative proposals should be considered, if real problems can be documented, that are site specific and are based on actual site-specific information.

Proposal #17. Establish a bounty for taking beaver in Unit 1D.

Fish and Game should reject this proposal. The benefits provided by beaver are ignored. And site specific problems, if any, are neither named nor documented.

Proposal #23. Protection of light phase of black bear.

I support this proposal for the reasons presented.

Proposal #25. No bear hunting in the section described.

I strongly support this proposal made by Al Gilliam. This area in the Chilkat Valley above the Porcupine Bridge attracts bears with the chum salmon run in late summer and fall. The highway overlook is a popular destination for families, tourists, and photographers. It is easily visible from the highway overlook provided for families, tourists, and photographers. No bear hunting should be allowed in this area.

COMMENT#

8

Proposal #30. Eliminate the point system for moose hunts. Open the season to all hunters. Allow only one moose every two years per hunter.

I support this proposal because otherwise the same 25 to 30 people are harvesting all the moose every year. In a population of over 2000, there should be a more fair and equitable distribution of this resource.

Proposal #31. Lengthen the hunting and trapping seasons for wolf in Unit 1D.

I strongly oppose this proposal. There is no evidence of either an overabundance of wolf in the Chilkat Valley or that the moose population in the Chilkat Valley is not doing well because of the presence of wolves. In fact, the contrary is true. The moose population in the valley is thriving. Evidence: a successful hunt of 30 moose this year. And the wolf population is in balance as it should be. In fact, as a wildlife photographer who has lived and photographed wildlife extensively in the Chilkat Valley for 14 years, I have yet to have had even one encounter with a wolf in the Chilkat Valley. The length of the hunting and trapping season for wolf in Unit 1D should not be lengthened. The people who live here treasure the presence of the wolves that we do have. To kill more wolves to benefit moose hunters, of which there are only 25-30 each year, is disproportional to the majority of the population of the area of over 2000 who value the presence of wolves in our valley.

Proposal #45. Extend wolf hunting season from April 30 to May 31 in Units 1 and 2.

Strongly oppose this proposal. That spring bear hunters would enjoy harvesting a wolf is not a valid reason to disrupt the family rearing activities of wolves at this time of year critical to wolf pup rearing.

Proposal #46. Shorten the length of wolf hunting season to the dates recommended.

I strongly support this proposal for the reasons presented by Defenders of Wildlife, the Alaska Wildlife Alliance, the Alaska Center for the Environment, and the Tongass Conservation Society. Sept. 1 to March 31 is plenty of time to hunt wolves. August and April are important times for wolves and their families to not be disturbed by hunters.

Proposal #50. Make it legal to disturb and destroy wolf dens as a predator control method.

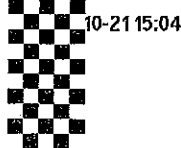
The Board should reject this proposal. Predator control in general benefits only a few people and then only for the short-term. In the long run, both predator and prey benefit from allowing natural fluctuations. Dens should not be disturbed or destroyed. Ungulate populations will benefit more from habitat protection and better management of human hunters.

Thanks again for the opportunity to comment.

Sincerely,



Kathleen Menke, Haines



BOG Comments,
ADF&G, Boards Support Section,
P.O. Box 115526, Juneau, AK, 99811-5526
Fax: 907-465-6094

RECEIVED
OCT 21 2008
BOARDS: *Oct. 21, 2008*

Dear Board of Game Members:

I am a longtime hunter and Alaska resident for 29 years, writing regarding the following upcoming proposals:

(Regarding Beaver)

Proposal 16: OPPOSE- This proposal would extend the beaver hunting/trapping season by 4.5 months, Sept. 1 - June 30, in Unit 1D, the Chilkat Valley. This extension is extreme, particularly because there are no bag limits on beaver. This proposal is likely to be detrimental to the population and runs more risk of accidental entrapment of dogs, etc.

Proposal 17: OPPOSE- This proposal would allow for bounties on beaver in Unit 1D, the target area being the Chilkat Valley. Bounties are historically difficult to regulate and when instituted have had dire consequences in eliminating and/or seriously decreasing various species populations. Another reason to oppose this proposal is related to cost; we don't need to be paying for these bounties.

(Regarding Bear)

Proposal 23: SUPPORT- This proposal would ensure that cream-colored black bears would be protected from hunting under enforceable regulations in Unit 1D, Haines, Klukwan, Skagway areas. These bears are a unique and valuable wildlife resource to protect as they provide a special opportunity for appreciation & enjoyment for everyone.

Proposal 24: OPPOSE- This proposal would extend the spring brown bear hunting season by 2 weeks in Unit 1C, the mainland from Cape Fanshaw north to the Katzeihin River. Bear are especially vulnerable to hunters in the spring as they frequent intertidal/coastal areas where they can easily be seen and shot. This season extension overlaps with tourism viewing and conflicts with brown bear conservation principles.

Page 1 of 2

10/21/08

(Regarding Wolf)

Proposal 31: OPPOSE- Extending the wolf hunting/trapping season in Unit 1D, Haines, Klukwan, Skagway area, by 2 weeks until May 15, because of the belief that the current wolf population could be detrimental to and could decimate the moose herd is anecdotal. There must be scientifically based data to support such a proposal. In addition, extending the season into May will cause more wolf pup mortality as a result of killing adult wolves that pups rely upon for their survival. Plus, the coats are not as nice then and will not bring as good a price.

Proposal 45: OPPOSE- This proposal to extend the wolf hunting season by 1 month, to May 31- the season currently runs from Aug.1- April 30, in Units 1 and 2, i.e. Juneau, Douglas Island, the mainland north and south of Juneau, Haines, Klukwan, Skagway, and Prince of Wales Island, is unwarranted and would be inhumane to pups born in the spring as they are reliant on adults for their survival. Plus, the coats are not as nice then and will not bring as good a price

Proposal 46: SUPPORT- This proposal would decrease the wolf hunting season by 2 months in Units 1, 3, 4, and 5- essentially all of SE AK except for Prince of Wales Island. The season would revert back to Sept.1-March 31 versus the current season which is Aug.1- April 30. Wolves killed in Sept. and April have less quality/value hides due to rubbing and being un-prime fur; therefore a lengthened season is not beneficial to trappers desiring maximum hide values. In addition pups who are orphaned in summer and early fall will continue to starve and die inhumanely unless the season is shortened. Another reason is that female wolves are pregnant and near full term in late April. It is inhumane to kill them and not sound conservation for a species with big game and furbearer values.

Thanks for the opportunity to comment.

Sincerely,



Jeff Sloss
740 5th St.
Juneau, AK 99801
jssloss@gci.net

Page 2 of 2

October 21, 2008

To: Alaska Department of Fish and Game
Attn: Board of Game Comments
Boards Support Section
PO Box 115526
Juneau, AK 99811-5526

RECEIVED
OCT 21 2008
BOARDS
SUPPORTS
SECTION

From: Mitch Falk
PO Box 210775
Auke Bay, AK 99821
907-790-4789

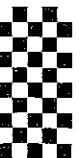
RE: B.O.G. Proposal #28

“PROPOSAL 28 – 5 AAC 85.045(a)(1). Hunting seasons and bag limits for Moose. Replace the "any bull" hunt at Gustavus with an antler restriction hunt. Bulls with spike-fork or 50-inch antlers or antlers with 3 or more brow tines on one side would be legal.”

I have been moose hunting in Gustavus since the early 90's. My first bull shot there was on Oct 12th and we hauled it out with an 8 wheeled Argo. I believe my bull that year was 1 of 9 or 10 taken that year and the season lasted 30 days. Over the next couple of years the moose population continued to increase and we continued to enjoy a good "Hunting Experience". We would plan our hunt around the good tides as that made access better, set up a wall tent and had a great hunting trip. We continued to be successful harvesting bull moose because we learned how and where to hunt in the area. Rapidly the total number of bulls harvested increased going from a handful to 50 or more in just a few years.

The moose hunting restrictions started in the mid 90's. Due to increased pressure and a few hunters using poor judgment ADF&G outlawed the use of "Off Road Vehicles" for use during moose hunting. This action seemed to have the desired effect, slowing the harvest and protecting the environment from the tracks and rutting that occurs with excessive use of ORV'S. We adapted and developed methods of retrieving our moose without the use of ORV'S. The quality of the "Hunting Experience" continued to be high and we recruited young hunters into our camp and taught them the value of the "Hunting Experience". In the mid to late 90's the bull harvest jumped to over 50 animals and ADF&G using sound management practices chose to close the season early. This early closure did not adversely affect most of the "traditional" hunters as the season had already run 3 wks. (A few years are a pretty short period of time to establish a tradition). The combination of the large harvest and the attention of the early closure announcement generated even greater hunter numbers and "THE RACE WAS ON". The Gustavus moose hunt turned into a big derby with the goal to "kill" your bull as fast as possible on opening day because the hunt was going to be closed early. People were coming into the ADF&G office to get a registration tag that had no

COMMENT# 10



idea where Gustavus was or even how to pronounce it. The overall "Hunting Experience" was reduced greatly. The 2nd to last year I hunted in Gustavus the bull I shot had a 7mm Mag bullet in the shoulder that penetrated about an inch. Talking with ballistics experts back in Juneau they figured the shot was taken at over 700yds! The last year I hunted in Gustavus I took my youngest son, wanting to expose him to hunting and hopefully have a good "Hunting Experience". Boy was I wrong. Opening morning there were so many bullets flying through the brush around us I felt we were in a combat zone and I feared for the safety of my son. For the first time since taking my 1st bull in Gustavus I left without harvesting a bull and I vowed not to go back until the situation had been cleaned up. The "Hunting Experience" had been reduced to ZERO! The most recent slaughter occurred this fall, the season closed after 6 hrs only because the biologist could not close it after 20 MINUTES!

Recommendations:

1. Adopt a permit drawing hunt. I know this will make some people unhappy but this is not a private hunt on private land. These are public animals on public land. A permit drawing hunt is the easiest to manage from a biologist's stand point, the season would last more than an hour and all hunters would have the same chances of drawing. The overall affect would return this hunt to a great "Hunting Experience".
2. My plan B would be to adopt the ADF&G proposal of a Spike/Fork; 50" except do away with the 50" and impose a 3 Brow Tine rule. The problem with the 50" option is there are a lot of 48" bulls in Gustavus and the result would be dead bulls rotting on the ground because they were an inch or two under the legal size. This plan also does very little to decrease the number of hunters in the field and would probably increase the number of illegal bulls taken as hunters would feel the competition from other hunters and be more inclined to shoot a marginal bull. The overall affect is a "Hunting Experience" not much better than the current situation.

Sincerely,

Mitch Falk

COMMENT# 10

P.O. Box 22493
Juneau, AK 99802
(907) 321-8300

RECEIVED

OCT 20 2008

BOARDS

Attn: BOG COMMENTS
Alaska Department of Fish and Game
Boards Support Section
P. O. Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094

October 15, 2008

Proposal 22: 5 AAC 92.550, Areas Closed to Trapping

Dear Board of Game,

Thank you for your consideration of restrictions on trapping on recreational trails in Juneau at this meeting proposed by the State Parks Advisory Board.

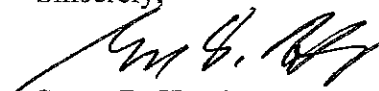
This is a very personal issue for me, as several years ago my dog was caught in wolf traps on a Juneau trail (Boy Scout Camp trail). This resulted in significant injury to my dog and personal cost to me, even though she had been close at my side before being drawn away by the smell of the baited trap. The vet told us that she would have died if we had not been able to obtain wire cutters at a house on the main road, and if she had been in the trap for another hour (if we were farther down the trail and/or couldn't run two miles).

I appreciate your consideration of the issue, and I would ask each of you to vote in support of modifying the areas closed to trapping in Unit 1C to include the recreational trails listed in the proposal (Amalga, Auke Nu, Eagle Glacier, Point Bridget, and Salmon Creek trail).

I believe adding these trails would be of significant benefit to the community, and would not have a significant adverse impact on trappers. The public use of these trails has steadily increased over the past several years. Although it may be an inconvenience to move trapping to other trails, continued trapping on these public access trails will inevitably lead to further trapping of personal pets, resulting in injury or death for these animals.

Thank you for your consideration of this matter. I would be happy to testify or answer any questions regarding this letter.

Sincerely,



Susan D. Hargis

COMMENT# 11

**Eastern Interior Alaska Subsistence
Regional Advisory Council**
 c/o Office of Subsistence Management
 101 12th Avenue, Room 110
 Fairbanks, Alaska 99701
 Phone: 1-(907)-456-0277 or 1-800-267-3997
 Fax: 1-(907)-456-0208
 E-mail: Vince_Mathews@fws.gov

RECEIVED
 OCT 20 2008
 BOARD

October 20, 2008

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

Dear Board of Game:

The Eastern Interior Alaska Subsistence Regional Advisory Council during its public meeting on October 14, 2008 reviewed statewide and Interior region bear and a veteran's hunt proposals that are before the Alaska Board of Game at your November 7 – 11, 2008 meeting in Juneau. Below are the recommendations passed by the Regional Council. The Regional Council appreciated the assistance of Roy Nowlin when they reviewed the proposals.

PROPOSAL 49 – 5 AAC 92.085. Unlawful methods of taking big game; exceptions, and 92.260. Taking cub bears and female bears with cubs prohibited. Modify the methods for taking black bear in Unit 25D as follows.

5AAC 92.260. Taking cub bears and female bears with cubs prohibited **except in Unit 25D for female black bears.**

5AAC 92.085. Unlawful methods of taking game; exceptions. The following methods and means of taking big game are prohibited in addition to the prohibitions in 92.080:

(6) with the use of a trap or snare; **except to snare black bears in Unit 25D. Snares need to be checked every 48 hours.**

(9) from a boat in Units 1-5 **and Unit 25D (to take black bears)** ; however...

COUNCIL ACTION:

The Council unanimously supported this proposal because it will make legal a traditional method of harvesting bears. Passage of this proposal will also reduce the large number of black and brown bears in the Yukon Flats area which have kept the area's moose population numbers low. Honoring these traditional methods will allow them to continue legally and assist with the predator control problem.

PROPOSAL 52 — 5 AAC 92.085. Unlawful methods of taking big game, exceptions, and 92.260. Taking cub bears and female bears with cubs prohibited. Allow the taking of black bear from dens in Units 21 and 24 as follows:

Allow the taking of any black bear from dens, September 25 to May 1 in Units 21B, 21C, 21D, and 24.

COUNCIL ACTION:

COMMENT# 12

The Council unanimously supported this proposal because the practice of taking black bears from dens is a long term traditional method of harvesting bears by Athabascans in the Interior. Passage of this proposal would address the challenge of identifying the sex of a bear in a den.

PROPOSAL 53 — 5 AAC 92.085. Unlawful methods of taking big game, exceptions, and 92.260. Taking cub bears and female bears with cubs prohibited. Allow the taking of black bear from dens in Units 21 and 24 as follows:

Allow the taking of any black bear from dens from September 25 to May 1 using artificial light in Units 21B, 21C, 21D, and 24.

COUNCIL ACTION:

The Council unanimously supported this proposal because it will assist with the continuation of a traditional practice and address a real safety concern with this traditional hunting practice. The hunter's safety and the welfare of the bear are at stake. The Council acknowledges that taking bears from dens is a recognized traditional method of taking bears by Native hunters in these units.

PROPOSAL 54 — 5 AAC. 92.125. Predation control areas implementation plans. Modify the predation control plan for Unit 20E to provide the following:

Under a bear control permit, allow the following: 1.) taking of all sex-age classes of both brown and black bears; 2.) the use of bear snares for taking bears; 3.) taking of bears same-day-airborne; 4.) sale of tanned and untanned hides and skulls from bears taken in the control program. Establish a working group to develop recommendations on methods, means, and protocol for carrying out the bear control program. This working group should include members of local advisory committees, public sportsman's organizations including the Alaska Outdoor Council, and the Department of Fish and Game research and management staff.

COUNCIL ACTION:

The Council unanimously supported this proposal because current restrictions on allowable methods to take bears prevent the elevated take of bears necessary for an effective predator control within designated intensive management areas. Without passage of this proposal, the high rate of bear predation on moose and caribou populations will continue thereby reducing the opportunity for local subsistence users to meet their subsistence needs. Unit 20E terrain is rough and difficult to access. Passage of this proposal hopefully will address the necessary predator control needed in this unit and will allow snaring, a lost art, to return to an area that has a long history of snaring bears.

PROPOSAL 55 — 5 AAC 92.090. Unlawful methods of taking fur animals; 92.095. Unlawful methods of taking furbearers, exceptions; 92.080. Unlawful methods of taking game, exceptions; 92.085. Unlawful methods of taking big game, exceptions; and 98.XXX. Areas of jurisdiction for taking predators in intensive management areas. Amend the regulations for methods, seasons, and bag limits for taking predators in intensive management areas as follows:

- 1. Establish a new section under 5 AAC 98.0XXX as follows: For the purposes of implementing AS 16.05.255(e), removing den disturbance prohibitions for the taking of wolves in areas with positive intensive management findings requires approval by a

COMMENT# 12

majority of the active Advisory Committees with jurisdiction located in, or the majority of whose members reside in the affected unit or subunit. For the purpose of this section an "active advisory committee" is a committee that holds a meeting and acts on the proposal.

2. In areas with a positive intensive management finding within 5 AAC 92.108 where habitat is not a limiting factor and moose or caribou populations are either not achieving or maintaining population or harvest objectives; or the population's harvestable surplus is not maintaining amounts necessary for subsistence:

- a. Delete, or create exception for, restrictions to disturbing or destroying dens for wolves.
- b. Extend wolf season closure date to May 31,
- c. From April 1 through May 31 increase bag limit to 10 per day.
- d. Delete, or create exemption for, prohibition of taking a sow with cubs.

COUNCIL ACTION:

The Council unanimously supported this proposal because they recognized that the denning of wolves was a traditional practice that provided a utilized resource while also reducing the competition for ungulate populations (moose and caribou) to meet subsistence needs.

PROPOSAL 56 — 5 AAC 92.XXX. Special hunts for disabled veterans. Create a new regulation for specialty hunts as follows:

Establish special hunts for each big game species on all military and some national and state lands. Permit fees can be charged to cover any administrative or other costs.

COUNCIL ACTION:

The Council unanimously supported this proposal in respect of 100 percent rated disabled veterans', who are not wheel chair bound, but who deserve additional opportunity to hunt in Alaska.

Thank you for the opportunity to provide Council recommendations on proposals important to subsistence users of the Interior and statewide. If you have any questions, please give me a call (1-907-883-2833) or our Vice-chair Virgil Umphenour (1-907-456-3885) or our Regional Coordinator, Vince Mathews (contact information in letterhead).

Sincerely,



Sue Entsminger, Chair

- cc: Eastern Interior Regional Council members
 Peter J. Probasco, Assistant Regional Director Subsistence
 Chuck Ardizzone, Board of Game Liaison, Office of Subsistence Management
 Roy Nowlin, Alaska Department of Fish and Game
 Rita St. Louis, Alaska Department of Fish and Game
 Jack Reakoff, Chair, Western Interior Regional Advisory Council

COMMENT# 12

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OCT 23 2008
BOARDS

P.O. Box 32875
Juneau, AK 99803
(907) 500-9067

Attn: BOG COMMENTS
Alaska Department of Fish and Game
Boards Support Section
P. O. Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094

October 18, 2008

Proposal 22: 5 AAC 92.550, Areas Closed to Trapping

Dear Board of Game,

Thank you for your service on this board and for consideration of restrictions on trapping on recreational trails in Juneau at this meeting proposed by the State Parks Advisory Board.

I am very concerned about the current procedures in our trapping regulations. Traps are in close proximity to widely used hiking trails and lack appropriate warning signs to prevent innocent people, children and pets from being harmed on trails that are used by people for multiple activities. Please help us protect all uses of these public trails.

I appreciate your consideration of the issue, and I would ask each of you to vote in support of modifying the areas closed to trapping in Unit 1C to include the recreational trails listed in the proposal (Amalga, Auke Nu, Eagle Glacier, Point Bridget, and Salmon Creek trail).

I believe adding these trails would be of significant benefit to the community, and would not have a significant adverse impact on trappers. The public use of these trails has steadily increased over the past several years. Although it may be an inconvenience to move trapping to other trails, continued trapping on these public access trails will inevitably lead to further trapping of personal pets, resulting in injury or death for these animals.

Thank you for your consideration of this matter. I would be happy to testify or answer any questions regarding this letter.

Sincerely,


Lauren Champagne

COMMENT# 13

PUBLIC COMMENTS TO BOARD PROPOSALS FALL 2008

PROPOSAL #30—5 AAC 85.045 Hunting seasons and bag limits for Moose. Modify the eligibility and bag limit for the subsistence moose hunt in Unit 1D as follows.

Eliminate the current point system for the TM 059 hunt, and open the hunt to any Haines resident applicant, but limit them to one moose every two years per family. Its equal to half a beef each.

I SUPPORT THIS PROPOSAL AS AMENDED:

- Do not change the bag limit
- **I agree with: Modify the eligibility for the subsistence moose hunt in Unit 1D.**

Do not eliminate the current point system, but modify the current point system to include:

- Put more emphasis on the points for question 15 so people who grew up in Haines and subsisted and depended on this herd for 20+ years can get a household permit for the hunter in the family.
- Possibly put less emphasis on points for question 16.
- Possibly add another question with regards to actual time spent living in Alaska during the previous year.

15.) What is the maximum number of years any one living MEMBER OF YOUR HOUSEHOLD, including yourself, has hunted or eaten meat from the Tier II population you are applying for in Question 13? Change as follows: Allow one point for every year claimed instead of one point for every 5 years claimed. EXAMPLE 3 attached on next page for point results.

16.) Within this Tier II hunt area, how many days did you, the applicant, spend hunting and fishing during the past year? (Do not include time spent commercial fishing or guiding.) This question allows people, whether honest or dishonest, to obtain up to 25 points, the second largest amount of points an applicant can receive, which can make the difference for a seasonal Alaskan resident getting a permit over applicants who have eaten meat from this subsistence herd for 20-30 years who reside permanently in Alaska year-round, in or out of the Haines Valley; an applicant can easily be deceitful on this question with no way for F&G to verify. If this question is to remain as is, an adjustment should be made to the points awarded to Question 15 with a possibility of an additional question worth 25 points. See EXAMPLE 4 & 5 attached on next page to see point results.

Another possibility is the addition of a question that asks: How many FULL MONTHS did the applicant reside in the State of Alaska during the year prior to application. This question could be worth 25 points with 2.083 points for every full month of residency. This, along with a change of points awarded for Question 15, would help distribute the permits to those whose year-round residences are in Alaska, including the newcomers to the valley, and also for those who have traditionally eaten and hunted this subsistence species for most of their lives. See EXAMPLE 5 attached on next page for point results.

WHAT WILL HAPPEN IF NOTHING IS DONE? People who have grown up in the Chilkat Valley, eating this resource all their lives, will continue to be denied permits if another person in the household is the applicant and is receiving only one point for every 5 years that the household member has eaten or hunted from this resource. It is also possible for year round Alaskan residents to be denied permits while a seasonal resident will win a permit based on Question 16 and how it is answered.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED?
No

WHO IS LIKELY TO BENEFIT? Those who have a history with this resource, having been born and raised in Haines, or lived in Haines for many years in the past and having eaten this resource for the years that they lived in Haines will benefit from a change. In addition, if a question were adopted regarding how many full months did the applicant reside in-state the previous year, a year-round resident would be awarded more points than the seasonal resident who winters in another state in the Lower 48.

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COMMENT# 14

WHO IS LIKELY TO SUFFER? Seasonal residents who have homes out of state, who leave the state to live in the Lower 48 during the winter months, and who live here only long enough to qualify for residency and the benefits that follow.

OTHER SOLUTIONS CONSIDERED? Please see amendment possibilities above and possible solutions on next page.

PROPOSED BY: Craig & Cheryl Loomis

EXAMPLE 1.) (This applicant received a permit.) Hunter "A" lives in Haines for just long enough to qualify for residency by staying in the Tier II area for 183 days per year, then he moves back to the Lower 48 for the remainder of the year. Hunter "A" puts down on his application that he hunts and/or fishes 70 days or more in the Tier II area (question 16). He is awarded 25 points for the question. He answers that he buys most of his food and gas in the community of Haines as he stays in Haines for the "majority" of the year even if it is 6 months and 1 day.

He puts that he or one member of his household has eaten meat from the Tier II population (question 15) for 10 years (even though he hasn't been a legal resident for the full 10 years), the length of time that he has been seasonally coming to Haines. He gets 2 points for that question. (Even though Hunter "A" has never hunted in this particular hunt, his friends have invited him over for moose steak dinner or given him a package of moose meat at least once every year from this population, therefore he puts down 10 years on his application.)

Hunter "A" leaves the state every winter to another home in the Lower 48, only staying in Alaska long enough to consider it a "majority" of the year. **Between those 2 questions Hunter "A" gets 27 points.**

Additional points: Question 14: 10 years, 10 points

Question 17: Haines, 7.5 points

Question 18: Haines, 8.4 points

TOTAL POINTS: 52.90 Hunter "A" outscores Hunter "B" who lives in Alaska year round and has a family member who has subsisted on this Tier II resource for 30 years. Hunter "B" did not get a permit.

EXAMPLE 2.) (This applicant was denied a permit.) Hunter "B" was born and raised in Sitka. He married his wife 10 years ago. She was born (when they still delivered babies in Haines) and raised in Haines. They reside permanently year-round in Sitka. They do not leave the state to live in another home. She and her birth family have gotten a moose every year since she was born except for one year, plus the several years the hunt was closed. Her family in Haines still shares their annual harvest with her family. Hunter "B" puts that he hunts and fishes in the Haines Tier II area for 7 days. He is awarded 10 points. He lists the maximum number of years any one living member of his household has hunted or eaten meat from the Tier II area as 30. He gets 6 points. The wife does not apply for a permit as she opts for her husband to be in the field hunting while she works and cares for the children who are also in school. **Between the 2 questions Hunter "B" gets 16 points.**

Additional points: Question 14, 10 years, 10 points

Question 17: Sitka, 4.8 points

Question 18: Sitka, 5.7 points

TOTAL POINTS: 36.50 Hunter "A" outscores Hunter "B" who lives in Alaska year-round and has a family member who has subsisted on this Tier II resource for 30 years. This applicant did not get a permit.

The person who resides in Alaska year-round, whose household member has a history in the Tier II hunt, cannot get a permit. But the seasonal retiree who has a summer home in Haines can get a permit because he stays just long enough to earn the maximum points on questions 17 & 18, and is awarded 25 points for fishing whether or not he is being truthful.

The BOG must have a good reason to have the hunting and fishing question on the application, however, if it could be given less importance or deleted completely, it seems it would be more equitable for all applicants in the Unit 1D hunt. Is there an important association with how many days one has fished to get a hunting permit in Unit 1D? Many people recreational fish in Haines as opposed to subsistence fishing and it would take almost the entire summer to fulfill 70 days. The BOG might also consider including one more clarifying question in addition to, or in

place of Question 16. *How many FULL MONTHS of the previous year did you reside in the State of Alaska?* Anything less than a full month might not be counted, and absence due to school and military might be excluded. This could be worth a possible 25 points with 2.083 points awarded per full month. This question would reward those living within the State of Alaska for the most time, specifically year-round residents versus seasonal residents when used in conjunction with one point for every year listed on Question 15.

POSSIBLE SOLUTIONS:

- **EXAMPLE 3.)** Award one point for every year noted in Question 15. In the current Tier II application if everything was left as is with the exception of adding one point for every year given in Question 15, points in the above examples would be:

Hunter "A" = 60.90

Hunter "B" = 60.50 (This applicant will have a better chance of getting a permit, based on traditional use of one household member, especially if other applicants do not enter 70 days of fishing/hunting activities.)

- **EXAMPLE 4.)** If Question 16 regarding hunting and fishing days were deleted, and Question 15 was awarded one point for every year listed:

Hunter "A" = 35.90

Hunter "B" = 50.50

- **EXAMPLE 5.)** Award a maximum of 25 points with 2.083 points for each full month during the previous year that the applicant actually lived in the state of Alaska, in addition to changing the points for Question 15. Leave Question 16 as is with no changes:

Hunter "A" = 73.40

Hunter "B" = 85.50

- Submitted by: Craig & Cheryl Loomis
PO Box 332
Haines, AK

September 25, 2008

Attn: BOG COMMENTS
 ADFEG / Boards Support Section
 PO Box 115526
 Juneau, AK 99811-5526

RECEIVED

SEP 26 2008

BOARDS

VIA: FAX (907) 465-6094

RE: Proposal #50, #51, #52, and #53

Dear Honorable Members of the Alaska Board of Game:

The four proposals relate to taking of bear and wolf in Game Management Units 19, 20, and 21, respectively, during periods when these predators are denning or hibernating. My comments relate to these proposals, specifically,

- Hunters' safety must be considered with these proposed regulatory changes; use of flashlights or artificial light, etc.
- Open hunting season should not be limited to denning of these predators, open hunting season should be year round including periods when these game are denning.

Thank you for considering my comments.

David Schor

David Epchook

PO Box 75

Juneau, AK 99801

RECEIVED TIME SEP. 26. 3:34PM

COMMENT# 15

PETER P. PAQUET

51 Eagle Bluff Drive
HC 60 Box 2619
Haines, Ak 99827
Phone (907) 767-5795
paquetpp@aptalaska.net

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OCT 11 2008

BOG

October 7, 2008

TO:
BOG Comments:
ADFG Board Support:
P.O Box 115526
Juneau , Ak 99811-5526

TO: BOG Comments:
ADFG Board Support:

To Whom It May Concern:

I'd like to respond to the beaver proposals in the Upper Lynn Canal as reported in the 9/25/08 edition of the Chilkat Valley News.

Extending the beaver season is not the answer. For one thing, furs are not worth anything after March. You will not get any trappers willing to trap beavers with the price so low. I think the answer is to open the season earlier, like Nov 1, the water is still open and a lot easier to maneuver.

I've been trapping for 40 years and there's no way I'm going to dig through 2 feet of snow and then chop two feet of ice to trap a beaver for less than 30 dollars. I have not trapped beaver for the last 3 years for that reason.

I for one would be out every day in Nov trapping beaver not only for the fur but would also use the carcasses' for bait for other fur bearing animals.

Hunting beaver and putting out a reward only encourages every nut in the Chilkat Valley with a rifle to shoot beaver, steal from other traps and also collect a reward.

Alternative request/ proposal/ Suggestion

To: BOG: and ADFG Board Support:

Provide a list of reported /verified problem beaver behavior complaints to trappers in the local area.
Provide a list and have available a list of registered licensed trappers for the land owner in their area.
Mediate and advise land owner expectations and trappers expectations and responsibilities.

Sincerely,
Peter P. Paquet

Signature



COMMENT# 16

ALASKA TRAPPERS ASSOCIATION, INC
P.O. BOX 82177
FAIRBANKS, AK 99708

October 8, 2008

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

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OCT 10 2008
BOARD

Dear Mr. Chairman and Board Members:

Thank you for the opportunity to review and to provide input and comment on proposals you will be considering at the November 2008 Board Meeting in Juneau. As you know, the Alaska Trappers Association is a statewide organization of more than 1,000 members from all across Alaska.

Proposal 1. Lengthen the wolf trapping season in Unit 1A. We **SUPPORT** this proposal.

The November 1 start date was the traditional opening. There appears to be no biological reason for the shorter season. Any additional harvest should be advantageous to local deer populations.

Proposal 2. Raise management (harvest) objective for wolves in Unit 1A. We **SUPPORT** this proposal. The slight boost in harvest objective in this subunit should have little effect on this healthy population of wolves. Harvest appears to have consistently exceeded the harvest objective with no apparent deleterious consequences. The population is thriving.

Proposal 8. Reduction of marten season on Kuiu Island. No position taken by ATA.

Proposal 15. Extend beaver trapping season in Unit 1C. We **SUPPORT** this proposal. We favor this expansion of trapping opportunity that obviously will have no biological repercussions.

Proposal 16. Open hunting/trapping of beaver in Unit 1D. We **SUPPORT** this proposal. This is enhanced opportunity to harvest beaver and reduce beaver blockages to anadromous fish streams.

Proposal 17. Establish a bounty on beaver in Unit 1D. We **OPPOSE** this proposal. We oppose government administered incentive programs and again urge the Board to consider passing Proposal 16 to address the stated problem.

Proposal 18. Lengthen trapping season for mink and weasel (ermine) in Unit 1C. We **SUPPORT** this proposal. This appears to be an opportunity to allow increased trapping opportunity without any significant deleterious affect on the mustelid resources.

Proposal 19. Lengthen the otter trapping season in Unit 1C. We **SUPPORT** this proposal. This proposal offers increased opportunity to take otter before they become “singed” in the spring.

Proposal 20. Open marten season a month earlier in Unit 1C. No position taken.

Proposal 21. Modify trapping restrictions for Unit 1C. We **SUPPORT** this proposal. Passing this proposal would allow pole sets for marten in areas adjacent to multiple use (sic) trails now listed as closed. This seems a fair compromise that should keep reasonable pet owners satisfied and still allow trappers to catch marten in these areas.

Proposal 22. Adds 5 new closures to trapping in Unit 1C. We **OPPOSE** this proposal. The non-consumptive users keep coming back to the table for ever more and more extensive closures. They seem to feel that it is always the trapper who is expected to give up “opportunity” and economic considerations as more and more ground is closed to trapping. In the spirit of fairness and compromise, perhaps it would now be time to (seasonally) prohibit free-roaming pets and allow trappers to continue to ply their trade.

Proposal 31. Lengthen seasons on wolves in Unit 1D. We **SUPPORT** this proposal. This appears to be a reasonable opportunity to enhance wolf harvest BEFORE an ungulate population begins to drop due to predation and more dire steps would have to be taken.

Proposal 32. Lengthen lynx season in GMU 5. We **OPPOSE** this proposal. Lengthening lynx season by a full 2 ½ months to accommodate accidental take seems drastic, especially at a time of year when lynx skins are not prime and including the breeding season. We would prefer the Board instead consider allowing 1 or 2 lynx, per trapper, to be taken incidentally in wolf/wolverine sets.

Proposal 33. Eliminate GMU 5 from trap identification requirement. We **SUPPORT** this proposal and encourage the Board to **EXPAND THE SCOPE TO ALL SOUTHEAST GMUs**. Trap ID tags are a bad idea in the first place and doubly ridiculous over 95% of SE Alaska’s rural areas. See also Proposal 35.

Proposal 34. Shorten wolverine season in GMU 1-5 to end February 15. We **strongly OPPOSE** this proposal. We do not feel that the data are available to show that this drastic step is necessary. The Department argues that “harvesting ANY female wolverine” in spring **COULD** have major negative ramifications on **FUTURE**

recruitment. While technically this may be true, it is also technically true in the case of ANY species, at ANY time. Wolverine harvest in Southeast Alaska is not high in spring-time. But to arbitrarily close the season in the entire region IN CASE there might be a problem is not fair to trappers. In the future, if there appears to be over-harvest in specific areas, that problem can be dealt with surgically rather than arbitrarily shutting trappers down 2 ½ months early based on what “might” occur.

Proposal 35. Eliminate trap marking restrictions in GMU 1-5. We **SUPPORT** this proposal. We do not find evidence of any advantage (either biological or enforcement-related) to this regulation. In other areas of the State where this was tried, it was soon found to be a waste of time and an unnecessary expense and bother to the trapper. Hopefully the Board will do the right thing and remove the requirement here as well.

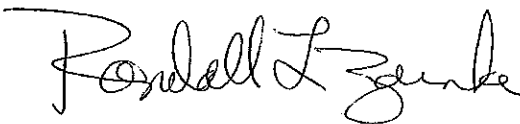
Proposal 46. Reduce wolf hunting season in Units 1, 3, 4, and 5. We **OPPOSE** this proposal. Southeast Alaska remains an area where wolf harvest by hunting and trapping has been fairly effective at keeping wolf numbers at reasonable levels. We would hate to see this equilibrium disturbed and State-sponsored predator control be required. This would suggest that current seasons/bag limits either be left in place, or expanded, rather than reduced.

Proposal 49. Modify methods of taking black bear in Unit 25D. We **SUPPORT** this proposal. We support adding a provision to allow the taking of black bears with snares. This is an effective, humane method of harvesting bears. Properly administered, it could go a long way toward helping moose populations to rebuild.

Proposal 50. Allow wolf denning in GMU 19. We **SUPPORT** this proposal. We support this traditional Native method of predator control in areas where it has been requested by local users.

Thank you for the opportunity to comment on these proposals.

Sincerely,



Randall L. Zarnke, President
Alaska Trappers Association

October 9, 2008

Gregg Parsley
(Naukati Bay, Alaska)
PO Box 129
Craig, Alaska 99921
(907) 965-5964

REC'D
OCT 10 2008
6:54 PM

Attn: BOG Comments
Alaska Department of Fish and Game
Boards Support Section
PO Box 115526
Juneau, Alaska 99811-5526

Re: Proposal 36 and Proposal 42

Dear Board of Game,

I have been an Alaska Charter Operator and Transporter since 1984. I began in Homer and now reside in Naukati Bay (Unit 2) where I only provide lodging for hunters and fisherman.

Proposal 36 Over the past two years I have blathered, repeatedly, about proposing a Total Elimination of the fall black bear hunt on Prince of Wales Island. The decline of the bear population is the number one concern. This decline has been brought on by an explosion in Non-Resident hunters and the ease of fall black bear hunting in the salmon creeks. Further, we have an explosion in transporters and guides that illegally hunt and shoot from skiffs and are only concerned with sending their guests home with "A Bear". For this reason far too many sows are being shot.

Moving the fall black bear opening date to "At Least" September 15th is a great idea.

Proposal 42 "Bologna", I love bear baiting. Making the hunter come into the office to get a Bait Permit or change a location is the only way to control the privilege of bear baiting. As most of you know, bear baiting takes serious advanced planning and at this time a hunter can register two locations. A couple of Non-Resident hunters can register four locations between the two of them. When Bear Baiting, it may take several days for a bear to hit a site, it takes patients! To allow folks to pick up the phone and change locations like changing a shirt is bound to cause problems, especially for enforcement. Having abandoned bait stations all over the woods with remaining sent would not be a good idea.

How about changing the current regulation to read "A hunter can **only** register two (2) black bear bait stations a year" PERIOD! If a hunter did their home work why on earth would they need more?

Thank you for reviewing my comments.

Best Regards



Gregg Parsley
Naukati Bay, Alaska
www.naukatibay.com

COMMENT# 18

Calvin H. Casipit
8699 Duran St.
Juneau, AK, 99801

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OCT 7 2008

BOG

October 3, 2008

Alaska Board of Game
ATTN: Board of Game Comments
Boards Support Section
PO Box 115526
Juneau, AK. 99811-5526

Dear Board of Game Members:

I am writing to you to express my comments on two proposals that will be before you at your November meeting and a specific concern with a past action taken by the Board of Game (BOG) regarding the Gustavus forelands moose population.

First, I have a specific major concern with an action taken by the BOG in 2006, that I only have recently become aware. The BOG changed the subsistence determination for Gustavus moose from "No Determination" to a "Negative Determination" for this population. I made repeated attempts to get staff reports regarding this issue from the Board Support Section, I am still waiting. It appears that the BOG made this hasty decision based on no staff work, no public comment from the communities most affected by this decision, no public notice, and at a place and time distant from the communities most affected. The action violated the public trust and violates the principles of an open democratic government that we Americans and Alaskans hold so dear. The BOG should immediately rescind its decision from 2006 and undertake a proper analysis of this issue in full public light and encourage the communities most dependant on the Gustavus moose population to express its concerns and comments.

Proposal 27 – I fully support this proposal. ADF&G managers have overseen the killing of 171 cow moose on the Gustavus forelands since 2002, and 15 more are planned to be killed in December 2008. The fall bull moose harvest objective has dropped from 40 in 2002 to 15 in 2008, in response to the reduced recruitment of young bull moose. It is any wonder that the population has crashed in light of this ill-advised harvest of cow moose? If those 171 cows had not been killed, they potentially could have produced 85 young bulls, thereby eliminating the need to reduce the bull quota to 15 and having only a one day hunt this fall. $[171 \times .20 \text{ (pregnancy rate)} \times .5 \text{ (XX:Xy)} \times 5 \text{ (years)} = 85.5]$ 85 bulls this year would have gone a long way to satisfy subsistence needs this year, and the hunt this year could have lasted more just one day.

Proposal 28 – I vehemently opposed to this proposal. The Gustavus moose population is a subsistence population, the community of Gustavus and many individuals depend on moose for food as my family does. We have eaten from this population and derive the majority of our red meat needs from the Gustavus moose since 1997. My hunting party

COMMENT# 19

has always harvested a moose from this population since 1997 and we don't waste a bite of the moose we have harvested. This fall's hunt was the first year we did not get a moose. Asking subsistence hunters to glass moose and try to determine if they have 50 inch spread or 3 brow tines is a burdensome restriction on subsistence users. It will make law breakers out of subsistence users who need moose to feed their families and the greater community. It is a very bad idea. The ADFG managers put themselves in this position of managing one day hunts by the ill-advised cow hunts (see above), they should not get a "free pass" to simplify their jobs by approval of this proposal. They screwed up the management of this herd of moose. They should not get to place the burden of their mistakes on the backs of subsistence users.

A better alternative would be to make this a Tier II hunt, if ADFG managers want to slow down the hunt. But we all know how many of the BOG members feel about subsistence and Tier II, don't we?



Calvin H. Casipit

September 18, 2008

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

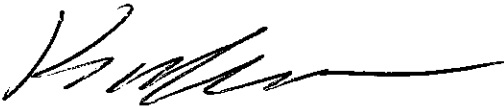
RE: Board of Game Proposals for November's South East Alaska BOG meeting.

Dear Kristy,

Please find enclosed my comments on a couple of the proposals for the fall BOG meeting. Thanks for your help, you have been great.

Should you have any questions please do not hesitate to contact me.

Sincerely,



Ken Vorisek
427 Crestmont Dr.
Fairbanks, AK 99709
Ph# 907-479-3075
Fax# 907-479-5605
Cell 907-322-1413
Email <timberwf@gci.net>

COMMENT# 20

BOARD OF GAME COMMENTS South East Region, 2008

PROPOSAL #5-----SUPPORT

5 AAC 92.044 (Exhibit #1) is the regulation established by the Board of Game (BOG) that sets the conditions for bear baiting. The Department's Ketchikan office is imposing additional bear baiting restrictions (Exhibit #2) in Unit 2 that are NOT conditions of 92.044. The Board of Game has not given the Department the authority to impose these additional restrictions, nor, have those restrictions gone through the regulatory process.

The new restrictions being placed on baiting in Unit 2 require a hunter to provide GPS coordinates or a spot on a USGS map before a bear baiting permit is issued. This requirement necessitates all first time Unit 2 bear baiters and anyone wishing to establish a new bait site to travel to the hunting area, obtain a bait location, travel back to Ketchikan or Craig for a permit, then travel back to the hunting area before baiting. If they wish to change bait sites then they must start the process over. A needless, burdensome and costly requirement.

Further, the Department's new restrictions require a hunter to apply in person in Ketchikan or Craig for a bear baiting permit. Unit #2 is a very remote Unit consisting not only of Prince of Wales Island but also many surrounding islands. The difficulty of traveling between hunting areas and Ketchikan or Craig is monumental. Some hunters do not travel through Ketchikan or Craig to reach Unit 2. There is no biological reason to support such an action. There was a case this spring (2008) where hunters made the trip into Craig during business hours for their permits only to find the office closed due to a sick Department employee.

At the Spring 2004 Board of Game meeting the Department submitted proposal #18 (Exhibit #3) asking to: Add global positioning systems (GPS) to the list of allowable discretionary permit conditions (92.052). The Board of Game denied the GPS requirement for Permit Hunts. The BOG sited concerns about having mandatory "operative" GPS's in remote areas and there battery limitations. Now the Department has imposed in Unit 2 mandatory GPS coordinates or a "Spot on a USGS map" before a bear baiting permit will be issued. It is my view that the Department was told NO once to mandatory GPS coordinates, now by adding the language, "or a spot on a map", the Department is simply adding a loophole to the BOG directive.

The Board of Game has a long history of supporting bear baiting. 2003-142-BOG (Exhibit # 4) is a resolution passed by the BOG that states black bear baiting is not in any way a biological issue; and "Banning or restricting baiting would result in the removal of a valuable wild life resource management tool". Further, 2004-151-BOG (Exhibit #5) passed by the BOG states the benefits to baiting and sets a desired 1000 bear statewide baiting harvest.

While the Department may publically say it supports bear baiting in South East it's actions demonstrate a desire to reduce or stop it. According to numbers we received from the Department, in 2006, 86 people were issued baiting permits for Unit #2. In 2007 after some additional restrictions were placed on Unit 2 there were 71 people issued permits. In 2008 after the bulk of the restrictions were put in place the number of people baiting dropped to 51, a 59% reduction. It is clear that the Department's actions are not supportive of 2003-142-BOG and 2004-151-BOG. The Department's additional baiting conditions are negatively impacting use.

We approached the Department in July/08 with an invitation to co-sponsor a BOG Proposal that might resolve concerns while being mutually agreeable to the Department and hunters. We received the following response from the Department of Law (Exhibit #6): Not only was the Department unwilling to try and resolve the concerns, they stated; "To the contrary, there appears to be a serious question as to whether baiting in the Unit is appropriate at all,". The Department's effort is not to resolve problems in a way that maintains use, support BOG resolutions, or provide for bear baiting, but rather, there actions show a dislike for baiting and an attempt to restrict it to little or no use.

The Department states enforcement and trespass/cleanup issues as cause to stop bear baiting. These are enforcement issues and not biological issues. To stop or restrict use is always the easy way out when a problem arises, if every time there was a game violation we were restricted, there would be no more hunting. The answer is proper enforcement and not further restrictions on the innocent. After 18 years of baiting Unit 2 by our hunting party we have not incurred any baiting problems.

Unfortunately the Department has adopted an anti-bear baiting agenda in South East. Rather than support baiting as a viable method of hunting black bears and to be consistent with the BOG resolutions, the Department is working to stop or reduce baiting by implementing restrictive conditions that are very difficult and costly for the hunter to meet. Approving this proposal will simply and effectively allow for reasonable bear baiting conditions while protecting the hunter from unreasonable and burdensome restrictions.

Please support Proposal #5.

PROPOSAL #41-----OPPOSITION

This proposal is NOT a "housekeeping proposal" as stated by the Department. Rather, it is an attempt by the Department to gain the authority to implement some 23 additional requirements to bear baiting in Southeast Alaska.

Currently 5 AAC 92.044 (Exhibit # 1) is the regulation implemented by the Board of Game that sets the conditions for baiting black bears. No other conditions apply. 5 AAC 92.052 (Exhibit # 7) are discretionary conditions that may be applied to "Permit Hunts", "Permit Hunts" are

defined as “a hunt for which a permit is issued on a drawing or registration hunt bases”. There are 4 types of hunts, General Season, Drawing, Registration, and Tier 11. A Bear Baiting Permit is NOT a type of hunt, it is a permit that allows you to bait black bears. Black bear hunting in Unit 2 is a General Season Hunt, (Not a Registration or Permit hunt). By regulation, 92.052 does not apply to General Season Hunts or Bear Baiting Permits. The Department knows it does not apply or it would not have submitted this proposal, it is attempting to gain new and far reaching authority under the pretext of “housekeeping”.

It is clear that the Department is seriously considering ending bear baiting in Unit 2 (Exhibit #6). By being able to implement the very restrictive nature of the conditions in 92.052 the Department will have the tools to accomplish that end. 92.052 was intended to give the Department tools to manage a very limited game resource, a resource that requires either a registration or drawing hunt. 92.052 is a Statewide regulation that was not intended to be applied to bear baiting.

92.052 is a Statewide regulation, not a local South East regulation. To date, the regulation has been applied uniformly throughout the state. If this proposal is approved it will allow a Statewide regulation to be applied to a limited area, Units 1-5. This is certainly contrary to the intent of a Statewide regulation and is sure to cause confusion, administrative problems and unequal application of the regulation.

Keep the impact of passing such a proposal as #41 in prospective. We often think of the “Department” as being a large, cohesive organization that would use good discretionary judgement before implementing any one of the very restrictive conditions of 92.052. However, once the “Department” gains this authority individual biologist, that may have a personal agenda or views contrary to BOG directives, will be able to freely impose unreasonable restrictions. This has been the case with Unit 2 bear baiting.

Please keep Statewide regulations from being piecemealed throughout the state and prevent unreasonable restrictions from being placed on bear baiting. Fail Proposal #41.

Ken Vorisek
427 Crestmont Dr.
Fairbanks, AK 99709
Ph# 907-479-3075
Fax# 907-479-5605
Cell 907-322-1413
Email <timberwf@gci.net>

PROPOSAL 5 – 5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures and 92.052. Discretionary permit hunt conditions and procedures. Modify the black bear baiting permit conditions in Unit 2 as follows:

Add language to 5 AAC 92.044 (a) as follows:

...

a) A person may not establish a black bear bait station to hunt black bear with the use of bait or scent lures without first obtaining a permit from the department under this section. **In addition to designated department offices permits shall be available by mail.**

Add condition number 11 to 5 AAC 92.044 as follows:

...

(11) Providing exact bait locations, including GPS coordinates or map markings is voluntary.

ISSUE: For the 2008 hunting season the Department of Fish and Game has imposed conditions for bear baiting in Unit 2 that require a bear baiter to provide, in person to the Ketchikan or Craig office exact GPS coordinates or an exact point on a map of bait locations before a baiting permit will be issued.

Anyone wishing to bait bear in Unit 2 for the first time or without a prior bait location, or anyone wishing to change bait locations, will have to travel to the hunting area and obtain GPS coordinates or an exact bait locations, then travel to Ketchikan or Craig, apply for a bait permit during department office hours, and then travel back to the bait location before a bait can be established. Please understand, Unit 2 is a large, hard to access Unit with many remote islands. Much of the Unit is accessible only by boat or airplane, not all Unit 2 bear baiters bait Prince of Wales Island or have vehicles there, or travel through Ketchikan or Craig to reach Unit 2.

5 AAC 92.044 is the regulation establishing bear baiting conditions by the Board of Game. The conditions being imposed in Unit 2 are NOT conditions in 5 AAC 92.044. The Department is imposing baiting conditions that have not gone through the regulatory process.

WHAT WILL HAPPEN IF NOTHING IS DONE? Unit 2 baiters will continue to incur the unreasonable expense and time of multiple trips between the hunting area and Ketchikan and Craig. This could cost upwards of \$2,000 and two to three travel days.

Due to these new conditions bear baiting and baiting permits have dropped to a fraction of historic averages, thus reducing hunting opportunities in Unit 2. Hunters wishing to bait in Southeast Alaska will move to neighboring units, such as Unit 3, thus shifting baiting pressure to other Units.

5 AAC 92.044 will not be applied consistently throughout Alaska. The department will continue to subjectively add baiting conditions that are not in 5 AAC 92.044 without Board of Game action or due public process. Any person will be able to find a baiters exact bait location through the Public Information Act. This will likely cause infringement and harassment issues.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Yes, it allows for an effective management tool which will benefit bear management.

WHO IS LIKELY TO BENEFIT? All bear baiters, state and private concerns who benefit from revenues generated bear baiting.

WHO IS LIKELY TO SUFFER? People who wish to reduce bear baiting.

OTHER SOLUTIONS CONSIDERED? I tried to resolve the issue with the department without success. I also considered litigation, but at the Department of Law's recommendation, I will attempt to resolve the issue at the Board of Game level.

PROPOSED BY: Ken and Anna Vorisek (HQ-09G-002)

PROPOSAL 41 – 5 AAC 92.052 Discretionary permit hunt conditions and procedures.

Modify the current language to provide clarification regarding the intended authority of this section relative to issuing bear baiting permits in Unit 1-5.

5 AAC 92.052. Discretionary permit hunt conditions and procedures. The department may apply any or all of the following additional conditions to a permit hunt, when necessary for management of the species hunted. In Units 1-5 permit conditions from this section also apply to 5 AAC 92.044.

ISSUE: The department has regularly attached conditions to black bear baiting permits issued in Units 1-5. These conditions are necessary to control the use of these permits. A recent change in the requirements for permits issued in Unit 2 has caused some hunters to question whether the conditions of the permit are intended to include the discretionary permits hunt conditions in

5AAC 92.052. This proposal is intended to clarify the authority that the Board intended relative to issuing black bear baiting permits in Unit 1-5. This is a housekeeping proposal.

WHAT WILL HAPPEN IF NOTHING IS DONE? Confusion will continue for those who question the intent of the current authority, which could result in litigation and/or an emergency Board meeting to resolve the issue.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Yes. This proposal will allow the department to attach important and necessary permit conditions to black bear baiting permits to assure successful management of this type of hunting opportunity.

WHO IS LIKELY TO BENEFIT? Managers and hunters who recognize the importance of having specific condition apply to ensure that permits are obtained and used in a manner that is necessary to regulate the hunting activities associated with bear baiting.

WHO IS LIKELY TO SUFFER? Those who disagree with the need for applying specific conditions associated with bear baiting.

OTHER SOLUTIONS CONSIDERED?

PROPOSED BY: Alaska Department of Fish and Game

(HQ-09G-019)



✦ **5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures.**

✦ (a) A person may not establish a black bear bait station to hunt black bear with the use of bait or scent lures without first obtaining a permit from the department under this section.

(b) A permit issued under this section is subject to the following provisions:

(1) a person may establish a black bear bait station only if that persons obtains a permit under this section;

(2) in Units 6(D), 7, 14(A), 14(B), 15, 16(A), and 20(B), a person must complete a bear hunter clinic given by the department before that person may obtain a permit from the department under this section;

(3) a person must be at least 16 years of age to be issued a permit;

(4) a person may not have more than two bait stations established with bait present at any one time;

(5) a person may not use bait or scent lures within

(A) one-quarter mile of a publicly maintained road, trail, or the Alaska Railroad;

(B) one mile of a house or other permanent dwelling; or

(C) one mile of a developed campground or developed recreational facility;

(6) a person may not give or receive remuneration for the use of a bait station, including barter or exchange of goods; however, this paragraph does not apply to a licensed guide-outfitter who personally accompanies a client at the bait station site;

(7) a person using bait or scent lures shall clearly identify the site with a sign reading "black bear bait station" that also displays the person's hunting license number, and the permit number;

(8) only biodegradable materials may be used as bait; if fish or game is used as bait, only the head, bones, viscera, or skin of legally harvested fish and game may be used, except that in Units 7 and 15, fish or fish parts may not be used as bait;

(9) in areas where the bag limit is greater than one bear, the department my limit the number of bears taken over bait as condition of the permit;

(10) a permittee must remove bait, litter, and equipment from the bait station site when hunting is completed.

✦ **History:** Eff. 7/1/2004, Register 170; am 12/30/2004, Register 172; am 7/1/2005, Register 174

✦ **Authority:** AS 16.05.255

AS 16.05.330

EXHIBIT /

[http://www.legis.state.ak.us/cgi-bin/folioisa.dll/aac/query=\[group+!275+aac+92!2E044!27...](http://www.legis.state.ak.us/cgi-bin/folioisa.dll/aac/query=[group+!275+aac+92!2E044!27...) 9/18/2008

COMMENT# 20

Attention Southeast Alaska Bear Bait Hunters

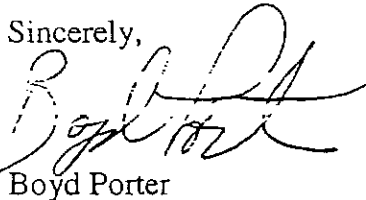
If you plan to register for a bear bait permit during the 2008 season in Game Management Unit 2 please be aware there will be some changes to the registration permit conditions. In an effort to obtain more accurate black bear bait registration information bait site permits will not be faxed or mailed prior to the 2008 spring hunting season. Hunters wanting to establish bear bait sites in Unit 2 will be required to visit one of the Fish and Game offices to obtain a bait permit.

Starting in April 2008 these permits will be available from either the Ketchikan, or the Craig Fish and Game offices. Other Alaska Fish and Game offices will not issue permits for Unit 2. Consistent with the past several years in Unit 2 we will require a specific location be provided at the time of application. This will include either GPS coordinates in NAD27 Datum, or a dot on a USGS map before the bait permit will be issued. Similar to other areas in the state, this location must be specific enough to enable someone to find the bait site while on the ground. Hunters should plan their trips accordingly to insure they are able to visit one of the Fish and Game offices after they select a bait location.

We will also require that the black bear bait station permit be mailed to our office to the address below within 30 days after the close of the season. That form is the actual numbered permit you posted at the trailhead, or near the registered bait site and includes hunting license numbers of all hunters who have hunted at your site. If this document is not received after the spring hunting season, similar to all other registration permits, you will not be allowed to register for a permit the following year.

Thank you in advance for your cooperation and participation in this important black bear management effort. If you have any questions please feel free to call the Ketchikan ADF&G office (907 225-2475).

Sincerely,



Boyd Porter
Wildlife Management Biologist
Alaska Department of Fish and Game
Division of Wildlife Conservation
2030 Sea Level Drive Suite 211
Ketchikan, Alaska 99901
(907) 225-2475

OR:

Alaska Department of Fish and Game
Westwind Plaza, Suite 302
Craig, AK 99921
(907) 826-2562

EXHIBIT 2

COMMENT# 20

PROPOSAL 18 - 5 AAC. 92.052. Discretionary permit hunt conditions and procedures.
Add a new discretionary permit requirement that would require hunters to take an operative GPS unit into the field for specific permit hunts.

5AAC. 92.052. Discretionary permit hunt conditions and procedures.

(x) a permittee shall carry an operative Global Positioning System (GPS) unit while in the field.

ISSUE: Global Positioning System (GPS) units are becoming more commonly used while in the field for hunting purposes. In some instances, the department could gather important information from hunters if exact harvest locations were known. In other situations, many hunt boundaries and closed areas are referenced by straight lines between specific points. If this proposal passes it would allow the hunt manager to require hunters in specific permit hunts to carry a GPS unit.

WHAT WILL HAPPEN IF NOTHING IS DONE? Like all discretionary hunt conditions this is only a tool that the department can use if the hunt manager feels it is necessary. If this proposal does not pass the department will not have this tool to utilize.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? N/A

WHO IS LIKELY TO BENEFIT? Hunters in the field where hunt boundaries are not easily identified.

WHO IS LIKELY TO SUFFER? People that do not use a GPS while hunting.

OTHER SOLUTIONS CONSIDERED? N/A

PROPOSED BY: Alaska Department of Fish and Game (HQ-04S-G-091)

PROPOSAL NO. 18

ACTION: Carried as amended

DESCRIPTION: Add global positioning systems (GPS) to list of allowable discretionary permit conditions.

AMENDMENTS: The permit hunt area authorized by the board may be subdivided into smaller permit hunt areas. The language requiring an operative GPS unit was removed.

DISCUSSION: The board discussed GPS use for some specific permit hunts and expressed concern with the term "operative" should a battery wear out or a person move out of working satellite range, as can occur in remote parts of Alaska.

EXHIBIT 3

COMMENT# 20

Alaska Board of Game
2003-142-BOG

A Resolution of the Alaska Board of Game Concerning a
Statewide Bear Baiting Ballot Initiative

WHEREAS, A ballot initiative that would prohibit bear baiting has been offered,
and

WHEREAS, Black bear baiting as a method of take is not in any way a biological
issue; and

WHEREAS, The Alaska Board of Game has adopted regulations to reduce
conflicts with other users, including a prohibition near trails, certain waterways,
residences and other facilities, as well as a requirement that bait station sites be
cleaned up at the end of the hunting season; and

WHEREAS, According to Alaska Department of Fish and Game, there is no
evidence or data to suggest that there is a correlation between bear baiting and
occurrence of food-conditioned bears near human habitation; and

WHEREAS, Alaska Department of Fish and Game reports that areas in Alaska
where black bear baiting is most commonly practiced are among those with the
lowest incidence of bear nuisance complaints; and

WHEREAS, Banning or restricting baiting would result in the removal of a
valuable wildlife resource management tool;

THEREFORE BE IT RESOLVED THAT the Alaska Board for Game, at their
regular meeting in Anchorage, November 4, 2003 urges the defeat of the ballot
initiative,

AND FURTHER LET IT BE RESOLVED THAT the Alaska Board of Game
reiterates its continued opposition to the use of ballot initiatives for managing
wildlife and wildlife use allocations.

Vote: 7/0
November 4, 2003
Anchorage, Alaska

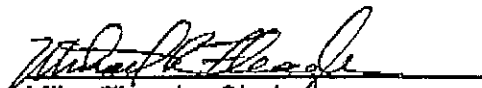

Mike Fleagle, Chair
Alaska Board of Game

EXHIBIT 4

COMMENT# 20

**Findings of the Alaska Board of Game
2004-151-BOG**

**Finding regarding Bear Baiting Allocation
March 10, 2004**

The Alaska Board of Game hereby finds that the board is tasked with and responsible for the allocation of the wildlife resources of the State of Alaska,

Black bears have proved to be a popular species for hunting and viewing via a number of methods, including baiting, across the State,

Population and harvest objectives for species important for human use, particularly for food, may be attainable without drastic bear control measures if a considerable number of bears are taken by bear baiters,

Approximately 650 black bears are currently harvested over bait in Alaska each year,

The harvest of black bears using bait has important economic benefits to the state including business for guide/outfitters and transporters, taxidermy, tanning, sale of handicraft items, sale of equipment for both archery and firearm hunters and more directly, from the sale of licenses and tags by the state,

The Boards of Fisheries and Game routinely allocate fish and game resources to user groups which are based upon the method of take.

The Alaska Board of Game has allocated at least 1,000 bears to bear baiters, for harvest in eighteen (18) Game Management Units across the state where regulations have been developed specifically to allow for such harvest.

Vote: 7/0
March 10, 2004
Fairbanks, Alaska



Mike Fleagle, Chair
Alaska Board of Game

EXHIBIT 5

COMMENT# 20

STATE OF ALASKA

DEPARTMENT OF LAW

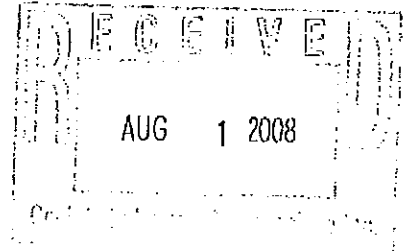
OFFICE OF THE ATTORNEY GENERAL

SARAH PALIN, GOVERNOR

1031 WEST 4TH AVENUE, SUITE 200
ANCHORAGE, ALASKA 99501-5903
PHONE: (907)269-5100
FAX: (907)276-3697

July 30, 2008

Mr. Zane D. Wilson
Cook Schumann & Groseclose, Inc.
714 4th Ave., Suite 200
Fairbanks, Alaska 99701-4470



Re: bear baiting issue
Your file no. 1259.09

Dear Mr. Wilson;

Since receiving your June 23 letter inviting the Department of Fish and Game to co-sponsor a proposal regarding bear baiting in Unit 2, I have discussed the topic with several responsible staff at the Department. To date, I have detected no interest in co-sponsoring such a proposal. To the contrary, there appears to be a serious question as to whether baiting in the Unit is appropriate at all, given the many enforcement and trespass/cleanup issues associated with the practice in that Unit. I cannot say what position the Department or Board would take on these concerns, but I thought you and your clients ought to know that these are important concerns, as you and they decide how to craft the proposal.

Sincerely,

TALIS J. COLBERG
ATTORNEY GENERAL

By:

A handwritten signature in black ink, appearing to read "K. M. Saxby".

Kevin M. Saxby
Senior Assistant Attorney General
Alaska Bar No. 8611136

cc. Doug Larsen
Kristy Tibbles
Dale Rabe
Boyd Porter

EXHIBIT 6

COMMENT# 20



✦ **5 AAC 92.052. Discretionary permit hunt conditions and procedures**

✦ The department may apply any or all of the following additional conditions to a permit hunt, when necessary for management of the species hunted:

- (1) a permittee shall register at a designated station before entering, and upon leaving, the field; except as authorized under AS 16.05.405 , a person may not hold more than one permit for the same species in a hunt area at one time;
- (2) a permittee shall demonstrate
 - (A) the ability to identify the species hunted;
 - (B) the ability to identify the permit hunt area;
 - (C) a knowledge of weapon safety and use;
- (3) a permittee shall attend an orientation course;
- (4) a permittee shall carry an operative radio while in the field;
- (5) a permittee who takes an animal under a permit shall deliver specified biological specimens to a check station or to the nearest department office within a time set by the department; the trophy value of an animal taken under a subsistence permit may be nullified by the department;
- (6) a permittee must be accompanied by a department representative;
- (7) only a specified number of permittees may hunt during the same time period, and a permittee may hunt only in a specified subdivision within the permit hunt area;
- (8) a permittee may not use specified mechanized vehicles for hunting big game or for transporting meat from the hunting area;
- (9) a permittee who cancels his or her plan to hunt shall notify the department at an office, and within a time limit, specified by the department;
- (10) a permittee may use only weapons and ammunition specified by the department;
- (11) before receiving a permit, the permittee shall acknowledge in writing that he or she has read, understands, and will abide by, the conditions specified for the hunt;
- (12) a permittee may hunt only during specified time periods;
- (13) a permit applicant must be at least 10 years old;
- (14) a permittee shall submit, on a form supplied by the department, information requested by the department about the hunt; the permittee shall submit this form to the department within the time limit

EXHIBIT 7

[http://www.legis.state.ak.us/cgi-bin/folioisa.dll/aac/query=\[group+!275+aac+92!2E052!27...](http://www.legis.state.ak.us/cgi-bin/folioisa.dll/aac/query=[group+!275+aac+92!2E052!27...) 9/18/2008

COMMENT# 20

set by the department;

(15) the permit applicant must hold a valid Alaska hunting license; however, this does not apply to a resident under the age of 16; an applicant's hunting license number must be entered on the permit application; a resident under the age of 16 shall enter his or her age instead of a license number;

(16) a hunter participating in a permit hunt that allows only the use of a bow and arrow must have completed a department-approved bowhunter education course;

(17) a permittee may take only an animal of a sex specified by the department;

(18) a person with physical disabilities, as defined in AS 16.05.940, with a special permit to hunt with a motorized vehicle, must be accompanied by another hunter who has a valid hunting license and is capable of assisting the permittee in retrieving game taken by the permittee;

(19) a person may be limited to one big game registration permit at a time in Units 1, 17, 20(E), 22, and 23;

(20) the number of registration permits that may be issued per household for a specified big game hunt may be limited;

(21) the permit hunt area authorized by the Board of Game may be subdivided into smaller permit hunt areas;

(22) a permittee may transfer the permittee's Unit 13 subsistence permit to a resident member of the permittee's family, within the second degree of kinship; a person may not receive remuneration for the transfer of a permit under this paragraph;

(23) except as otherwise provided, if a drawing permit hunt is undersubscribed, surplus permits may be made available at the division of wildlife conservation office responsible for management of the applicable hunt. Surplus permits are not subject to the limitations in 5 AAC 92.050(2) and (4)(F).

⊕ **History:** Eff. 7/5/85, Register 95; am 8/20/89, Register 111; am 7/1/92, Register 122; am 6/28/96, Register 138; am 7/1/2000, Register 154; am 7/1/2002, Register 162; am 7/1/2004, Register 170; am 7/1/2005, Register 174; am 7/1/2006, Register 178; am 7/1/2007, Register 182; am 7/1/2008, Register 186

⊕ **Authority:** AS 16.05.255

AS 16.05.330



BOG Comments
ADF&G Board Support Section
P.O. Box 115526
Juneau, AK 99811-5526

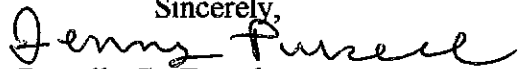
RECEIVED
OCT 15 2008
BOARD

Voices for Douglas Island Wildlife
P.O. Box 33578
Juneau, AK 99803

October 14, 2008

Dear Chairman Judkins and Board of Game Members,

Voices for Douglas Island Wildlife, {VFDIW} is a local organization based in the Juneau/Douglas area in SE Alaska. VFDIW was founded in April, 2002 with the sole purpose of advocating for local/regional wildlife. As a result of our mission we have actively participated in all of the SE cycle Board of Game meetings since November, 2002. Due to our interest in the management of wildlife in the northern SE panhandle we are pleased to submit our positions and comments concerning the following regulation proposals. We thank you for your time and attention to our input.

Sincerely,

Jenny Pursell, Co-Founder

Proposal 15: OPPOSE- This proposal that would extend beaver trapping by 3 weeks in Unit 1C, is not warranted as there are no bag limits on beaver during the current season and an extended season could be detrimental to the population.

Proposal 16: OPPOSE- This proposal would extend the beaver hunting/trapping season by 4.5 months, Sept. – June 30, in Unit 1D, targeted area is the Chilkat Valley. This extension is extreme, particularly because there are no bag limits for beaver harvest. As a result this proposal could negatively impact the beaver population.

Proposal 17: OPPOSE- This proposal would allow ‘ bounties ‘ on beaver in Unit 1D, target area is the Chilkat Valley. Bounties are historically difficult to regulate and when instituted have had dire consequences in eliminating and/or seriously decreasing various species populations. Another reason to oppose this proposal is related to cost; who will pay for these bounties?

Proposal 23: SUPPORT- This proposal would ensure that cream-colored black bears would be protected from hunting under enforceable regulations in Unit 1D. These bears are a valuable wildlife resource to protect as they provide appreciation/enjoyment for ALL user groups.

COMMENT# 21

Proposal 24: OPPOSE- This proposal would extend the spring brown bear hunting season by 2 weeks in Unit 1C. Bears are vulnerable to hunters in the spring as they frequent intertidal/coastal areas where they can easily be seen and shot. This season extension is not congruent with brown bear conservation.

Proposal 31: OPPOSE- Extending the wolf hunting/trapping season in Unit 1D by 2 weeks until May 15 because of the 'belief' that the current wolf population could be detrimental to and could decimate the moose herd is anecdotal. There must be scientifically based data to support such a proposal. In addition, extending the season into May will cause more wolf pup mortality as a result of killing adult wolves that pups rely upon for their survival.

Proposal 45: OPPOSE- This proposal to extend the wolf hunting season by 1 month, to May 31 in Units 1 and 2, is unwarranted and would be inhumane to pups born in the spring as they are reliant on adults for their survival.

Proposal 46: SUPPORT- This proposal would decrease the wolf hunting season by 2 months in Units 1, 3, 4, and 5. The season would revert back to Sept. 1- March 31 versus the current season, August 1- April 30. Wolves killed in August and April have less quality/value hides due to rubbing and being un-prime fur; therefore, a lengthened season is not beneficial to trappers desiring maximum hide values. In addition pups who are orphaned in summer and early fall will continue to starve and die inhumanely unless the season is shortened. Another reason is that female wolves are pregnant and near full term in late April. It is inhumane to kill them and not sound conservation for a species with big game and furbearer values.

Governor Sarah Palin
PO Box 110001
Juneau, AK. 99811

Denby Lloyd
Commissioner – ADFG
PO Box 115526
Juneau, AK. 99811

Alaska Board of Game
Boards Support Section
PO Box 115526
Juneau, AK. 99811

July 12, 2008

We, the undersigned people, and residents of the community of Gustavus, Alaska, request your help in addressing our community's subsistence harvest of moose and recent actions Alaska Department of Fish and Game (ADFG) and the Alaska Board of Game has taken to continue the killing of cow moose and restricting our community's ability to harvest moose for subsistence purposes.





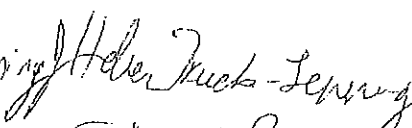

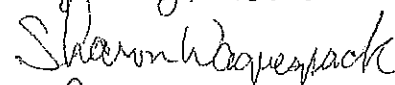
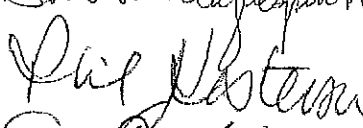


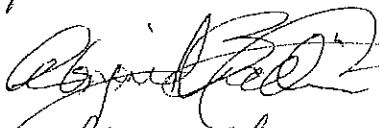

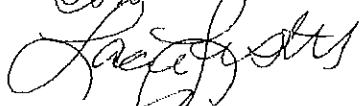

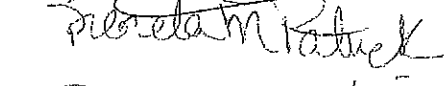

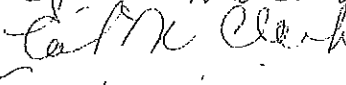
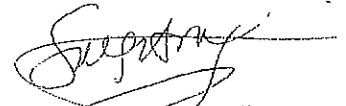



ADFG is again planning to conduct a draw cow moose hunt on the Gustavus Forelands for December 2008. We as a community are vehemently opposed to such a notion. We have expressed our opposition to any additional cow moose killing in public meetings with the local ADFG manager and to our local Advisory Committee. The draw cow moose permit hunts over the past 5 years has removed over 150 individual cow moose from the local population. We feel that this reduction is adequate to reduce the severe overbrowsing of winter habitat that led to the cow hunts in the first place. In addition, the past two winters have reduced the population even more. Also the increasing wolf population in the area is impacting the population even more now and into the future. (In fact over the 4th of July weekend recently past, a pack of wolves exhibiting little fear of humans showed up in our neighborhoods, and at least one young bull moose fell prey to this pack that weekend.) We request the immediate cancellation of all future cow moose hunts until the moose population recovers to its pre-winter 2006 population level.

We also have become aware of an action taken by the Alaska Board of Game in March 2006 to designate the moose population at Gustavus as a non-subsistence population. This was done without our knowledge, and without necessary input from our Community. It appears that this decision was made without a proposal that requested that action, and based on faulty assumption of individual Board of Game members, and inadequate ADFG staff reports. The action by the Board of Game in March 2006 to make the moose population on the Gustavus forelands a non-subsistence population was arbitrary and capricious, and violated democratic principles by not soliciting input from the Community of Gustavus on its subsistence use of the moose population and done without a specific public proposal that requested such an action.

COMMENT# 27

In conclusion, the undersigned residents of Gustavus, respectfully request that all future cow moose hunts on the Gustavus forelands be cancelled until the population recovers to it's pre-winter 2006 levels, and the decision by the Alaska Board of Game to make the Gustavus moose population a non-subsistence population be immediately rescinded until the Alaska Board of Game solicits and receives Community input and receives adequate ADFG staff work.

<u>Printed Name</u>	<u>Signature</u>	<u>Address</u>
Morgan DeBoer	<i>Morgan DeBoer</i>	Box 51, GST
CHARLES W. DEBOER	<i>Charles W. DeBoer</i>	Box 24 GST.
Renee Patrick	<i>Renee Patrick</i>	Box 287
Stanley W. Jarvis	<i>Stanley W. Jarvis</i>	P.O. Box 358
Stanley Jarvis	<i>Stanley Jarvis</i>	
Van Swanson	<i>VAN SWANSON</i>	PO. BOX 192
Will White	<i>Will White</i>	P.O. Box 84
William White	<i>William White</i>	P.O. Box 84 GST
Bob DeLong	<i>Bob DeLong</i>	P.O. Box 112 GUST
Steve Jarvis	<i>Steve Jarvis</i>	P.O. Box 245 GUST
Eric D. Hart	<i>Eric D. Hart</i>	PO Box 244 GUST
Marjorie Bartosovsky	<i>Marjorie Bartosovsky</i>	P.O. Box 295 GUST.
Marjorie Bartosovsky	<i>Marjorie Bartosovsky</i>	
Karen Milligan	<i>Karen Milligan</i>	P.O. Box 295 Gustavus
PAT MILLIGAN	<i>Pat Milligan</i>	P.O. Box 295 GUSTAVUS
Marion Bartosovsky	<i>Marion Bartosovsky</i>	P.O. Box 295 Gustavus
Dan Lesh	<i>Dan Lesh</i>	PO Box 60, GST
Krystal Waggoner	<i>Krystal Waggoner</i>	Box 152 Gustavus
Brent White	<i>Brent White</i>	Box 84 GUSTAVUS
Larry Hazen	<i>Larry Hazen</i>	Box 314 GUSTAVUS
ROGER BUTTRAM	<i>Roger D Buttram</i>	Box 242 GUSTAVUS

Printed Name	Signature	Address	Date
Brent White		Box 84 Gustavus AK	7-13-08
Valerie Wayvespack		203 Gustavus AK	7-14-08
Summer Stone		Box 311	7/14/08
Karla Techtzen		Box 153	7/14/08
J Heleen - Teuch-tzening		Box 205	7-14-08
Elvira J. Pedersen		Box 420	7-14-08
Sharon Wayvespack		Box 152	7-14-08
PHIL KESTERSON		Box 313	7-14-18
Eric Hart		Box 244	7-14-08
Bruce McDonough		Box 260	7-14-08
Abigail B. CALKIN		Box 238	15 July 2008
William L. Calkin		Po Box 197 Gustavus	15 July 2008
LACE LESTER		Box 184	7/15/08
Cable Wells		Box 184	7/15/08
Brenda Patrice		Box 226	7/15/08
Dena Matkin		Box 22	7/16/08
Eileen Clark		Box 164	7/16/08
Sally McLaughlin		Box 73	7-16-08
Joe Parker		Box 14	7/16/08
Mary G. Cook		Box 257	7/16/08
Zuharah D. Lennig		Box 205	7/16/08

Printed Name	Signature	Address	Date
Rebekah King	Rebekah King	PO Box 334	7-19-08
SEN SELLARDS	Steven Sellards	PO Box 293	7-20-08
Josh Cozby	Josh Cozby	PO Box 36	7-21-08
Kelly McLaughlin	Kelly	PO Box 73	7-21-08
Jon P. Howell	Jon P. Howell	PO Box 288	7-22-08
Wayne G. Clark	Wayne G. Clark	P.O. Box 164	7-23-08
Thomas S. McLaughlin	Thomas S. McLaughlin	P.O. Box 73	7-23-08
Dustin Hazen	Dustin Hazen	P.O. Box 319	7-23-08
MARIANNE McDonough	Marianne McDonough	PO Box 260	697-2733
John Nixon	John Nixon	P.O. Box 119 Gustavus	697-2205
Julie D. Vathke	Julie D. Vathke	PO Box 198 Gustavus	697-2497
Donald Duke	Donald Duke	PO. Box 44 Gustavus	697-2111
Kelsey Evans	Kelsey Evans	P.O. Box 183 Gustavus	697-2327
Matt Musser	Matt Musser	P.O. Box 183 Gustavus	697-2327

James m wilcox June 14/08 7-10-08
Mike Larsen Box 315 (697-2160)

David Hammond's Box 158 Gustavus AK 6923083

Mary Anne Chase BX 206 Gustavus, AK 697-2116

Elm Robichaud Box 116 Gustavus, AK 723 3722

Jenny Kinnel Box 335 Gustavus AK 697-2704
Elizabeth Kinnel - 11 - 697 2704

Eugene Farley Box 182 Gustavus AK 723 3177

Maitney Romero Box 284 Gustavus 907-209-0690 (Maitney) Romero

Donald D Romero Box 284 Gustavus 907-697-3370

Mary A Heroin Box 133 Gust. 99826 907-697-2349

Charles Rice Box 52 Gustavus, AK 697-2371

Larry Haze Box 319 Gustavus AK 209 0242

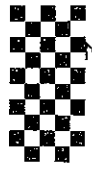
Tracy Lowell *Tracy Lowell* PO Box 188 Gustavus 7/18/08

Molly Kelly Molly Kelly PO Box 86 Gustavus, AK

Heather Parker *Heather Parker* PO Box 14, Gustavus, AK 99821

Cindy Kandle Box 254, Gustavus, AK 99826 *Cindy Kandle*

Julie Howell *Julie Howell*, PO Box 288, Gustavus, AK 7/21/08



ATTN: BOG COMMENTS

Alaska Department of Fish and Game

Boards Support Section

P.O. Box 115526

Juneau, AK 99811-5526

Fax: 907-465-6094

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OCT 23 2008
BOARDS

I am in total support of Proposals 15, 18, 19 and 20.

- Starting the trapping season on November 10th would be a great thing because it would allow better access to trap lines and more people will be able to participate in this activity. December 1st as a start makes trapping more difficult because of weather. The weather issue in Southeast Alaska is a major factor because of the ocean and limited access to surrounding public lands.
- This will allow younger kids to get involved in the sport of trapping because they wont be discouraged by the worse weather later in the year.
- It will allow trappers to catch prime fur and receive maxlimum profits for their hard work.
- Otter pelts start to lose value later in the season because the hair on their pelt singes.

These reasons make it clean for me as to why this regulation should be changed. It just makes better sense to make southeast Alaska's trapping seasons match what they majority of the rest of the state has.

I am in support of Proposal 21 but feel that a couple things in the initial proposal should be changed.

- It shouldn't be limited to traps that are less than 6 ¼ inches in diameter. It should be for all traps.
- The trap should be placed 4 feet off the hard ground because that is something that isn't going to change due to snow fall. Traps placed 4ft. or more above the ground are out of the way of dogs and other pets.
- A trap set 50 yards from trails is far enough to where it is out of plain sight of all user groups.
- If this regulation is changed it will open more public property to all user groups. It will make it easier for younger people to be involved in the sport of trapping.
- If these rules are allowed to stay the same or get tougher trapping will become nonexistent for future generations because every year there are more and more proposals for the BOG to make trappers set gear a ¼ mile from trails, roads, etc.

I am adamantly against Proposal 22 because it's a direct attack against one user group (trapper) from another.

- This proposal was created because of irresponsible dog walking and lack of knowledge.
- Trappers in the Juneau area already have the most stringent rules statewide.

- Dog walkers fail to follow the rules over and over and aren't punished. The trapper is continually punished for the dog walkers' mistakes.
- There shouldn't be a ¼ mile corridor on these trails because it basically eliminates trapping.
- If Proposal 21 is approved; it will correct the issues at hand here in this proposal. Both user groups will be able to coexist on public property which is what I would like to be able to see.
- The dog that was caught last year at Eagle River trail wasn't on a leash and that would have made this issue nonexistent.
- The State of Alaska Dept. of Fish and Game needs to have signage at all trail heads to provide all user groups with the proper information needed before they venture down the trails.
- There needs to be enforcement of the Leash Law from the City, State or Federal Government. I have seen numerous times that dog owners walk their dogs without a leash and just let their dog wander dangerously near the wolf at the Mendenhall Glacier, near highly used highways, etc.

I am totally against Proposal 35 because I feel it lacks the proper science behind it.

- This information that has been gathered is only gathered in two different geographical locations: Berners Bay & a bay down near Petersburg, Alaska. That isn't enough data to statistically say that trapping the 10-20 wolverines in SE Alaska is going to harm the sustainability.
- I have done some searching for wolverine studies in SE Alaska and there aren't many. I think that it is premature to limit the trapping and shorten the season without a clean scientific resolution.

COMMENT#

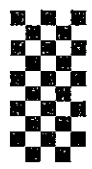
23

- In the proposal it is mentioned that limiting wolverine traps to areas that are accessible by boat only is ridiculous because that creates safety issues, and limits the areas of trapping to a lot of locations where there aren't wolverine.
- Until there is further information on wolverine habitats in SE Alaska I think the seasons, and bag limits should be left alone.
- I would be in favor of a compromise in making wolverine season end March 15th or March 31st because that would allow for both ADF&G to have a sustainable resource and allow trappers to trap wolverine later in the year

**From: Jacob Miller
P.O. Box 21708
Juneau, AK 99801
907-780-6061**

COMMENT#

23



23 October 2008

Board of Game Comments (fax 465-6094)
ADF&G Boards Support Section
P.O. Box 115526
Juneau, AK 99811

RECEIVED
OCT 23 2008
BOG

I am writing in reference to the following proposals:

PROP 8 I support Proposal 8 to shorten the marten season on Kuiu Island for residents and close the season to nonresidents. ADF&G has clearly demonstrated that marten populations on the island are in trouble, and it is in the interests of all Alaskans who use and appreciate our animal resources to support efforts to restore populations to sustainable levels.

PROP 34 I support Proposal 34 to shorten the wolverine trapping season. ADF&G has provided clear evidence that this management measure will aid in the recovery of the wolverine population and therefore contribute to sustainable future use.

PROP 50 I oppose Proposal 50 and I oppose amending regulations to permit denning in Unit 19. It appears that no alternative solutions have been considered; second, I do not see any evidence (scientific or otherwise) in the proposal that denning will solve the perceived problem. Finally, the proposed solution is inhumane. As someone who relies upon moose, deer, and elk throughout the year, I do not oppose game management. But I do oppose management by inhumane means and I do oppose making management decisions without adequate evidence. Please consider these points in your vote.

PROP 55 I oppose this proposal to remove den disturbance restrictions and to extend the wolf season. Denning is an inhumane management practice. Anecdotal accounts of denning as a "traditional" practice are insufficient justification for this form of predator control. Finally, the assertions in the text of the proposal that any opposition to the proposal represents bigotry and outside interests is offensive and mistaken. As an Alaskan who consumes game and supports subsistence hunting, I oppose this proposal as inhumane.

PROP 56 I support this proposal to facilitate hunting by disabled veterans.

Sincerely,

Erica Hill
Juneau, AK (907) 523-5682

RECEIVED TIME OCT. 23. 4:50PM

COMMENT# 24



The Alaskan Bowhunters Association, Inc.

3060 N. Lazy Eight Ct., Suite 2, PMB 144

Wasilla, Alaska 99654

907-376-2717 FAX 907-373-8942

www.akbowhunters.com

aba@alaskalife.net

ATTN: BOG COMMENTS

October 23, 2008

Alaska Department of Fish and Game

Boards Support Section

PO BOX 115526

Juneau, Alaska 99811-5526

FAX 907-465-6094

Dear Board of Game Members,

The following comments have been developed by the Board of Directors of the Alaskan Bowhunter's Association. We appreciate the opportunity to comment on some of the proposals.

At your Fall 2008 meeting in Juneau you will be considering twelve proposals relating to black bear hunting in units 1-5. This is 20% of the total current proposals for southeastern Alaska. These proposals have been advanced by a variety of concerned individuals as well as ADF&G and APHA. The number of proposals suggests there is concern for the resource.

Proposal #38-ADOPT It is clear from comments made in the ADF&G proposal #38 that they believe they have inadequate data to properly manage black bear in SE Alaska. They also believe that requiring harvest tickets would improve their data collection. We believe that this is true and would support harvest tickets for black bear hunters in units 1-5. Eventually this may be appropriate as a Statewide regulation as it would give better data for black bear hunting success and hunting pressure Statewide. However that is outside of the scope of this meeting. An important consideration however is that the harvest tickets must be readily available statewide just like other harvest tickets are. If this is not done then the requirement to find a harvest ticket may limit participation in the hunt.

Proposal#39-DO NOT ADOPT This is substantially similar to #38 but it has confusing language because it implies that harvest tickets would only be required of non-resident bear hunters. In addition it requires that not only the harvest ticket but also the associated report card be in possession of the hunter. This is an unreasonable requirement.

Proposal#37-DO NOT ADOPT We believe that simply requiring harvest tickets (accomplished with Proposal #38 above) will provide sufficient data.

Dedicated To Fostering And Perpetuating Fair Chase Hunting With The Bow & Arrow

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COMMENT# 25

Page 2 Alaskan Bowhunter's 10-23-08

Proposal#36-Consider Carefully If ADF&G can clearly show with good data from sealing forms such as declining age and skull size of harvested bear AND that non-residents make up a substantial portion of the black bear taken in the first two weeks of September should you consider passing this at this time. With passing #38 above you will have better data to work with if necessary to reduce any hunting seasons for black bear. Additional non hunting estimates of bear population should also be considered prior to restricting seasons. Examples would be DNA analysis of hair samples and trap recapture studies. Keep in mind that hunters pay for these studies through license revenues, Pittman Robertson funds and charitable organization contributions. Restricting hunting unnecessarily in the long run hampers good studies.

Proposals#6&7 DO NOT ADOPT These are anecdotal anti-hunting proposals. Only if there is good data provided by ADF&G that there is a marked reduction of the bear population should seasons be closed.

Proposal#5-ADOPT There has been an attempt by individual managers in ADF&G to apply discretionary conditions for PERMIT HUNTS to hunting black bear in a general hunt by the method of baiting. This has resulted in making it more difficult, time consuming and expensive for hunters to hunt black bear by baiting in certain areas of SE Alaska. Hunters have a desire for secrecy of specific hunting locations, especially good ones. We are concerned that other hunters will hunt our areas. We are concerned that anti-hunters will harass us while hunting. We are concerned that enforcement personnel who do not believe in bear baiting will harass us. We are concerned that regulations will be enforced to a ridiculous extent to discourage the practice of hunting bear over bait. For example the requirement to clean up all trash and equipment at a bait site is very reasonable. However the requirement that this include "all soil contaminated by the bait" is not reasonable. It could take bringing in a backhoe and loader to remove every speck of dirt which might have some sugar on it from a jelly donut. What if a bear eats your bait and then defecates twenty feet away contaminating that soil. How much soil has to be removed; how far does it have to be taken and where can it be put?

Proposal#42-Not Necessary if #5 above is adopted

Proposal #41-DO NOT ADOPT This proposal has been put in by ADF&G in response to reasonable complaints that they were incorrectly applying Discretionary Permit Hunt Conditions to bear baiting in a General Hunt. This is **Not a Housekeeping Proposal** as stated in their discussion. It is an attempt to over-ride the authority of the Board of Game so that they may apply restrictions on a legal method of hunting with which they do not agree. Within the last two years the department has reduced the number of bear baiter by simply applying more restrictive, expensive conditions to the hunt. Please do not allow them to do this. Bear baiting permits are covered in 5AAC 92.044 and have many excellent permit conditions (developed by the Board of Game). The Discretionary Permit Hunt Conditions in 5AAC 92.052 should not be applied indiscriminately by local regional managers. Please carefully consider the excellent presentation by Mr. Ken Vorisek in his personal comments to the Board of Game regarding proposals #5 and #41.

Page 3 Alaskan bowhunter's 10-23-08

We believe that the specific language "important and necessary permit conditions.....to assure successful management of this type of hunting opportunity" and "in a manner that is necessary to regulate hunting activities associated with bear baiting" is bureaucratic speak for how can we most effectively limit and restrict hunting activities associated with bear baiting.

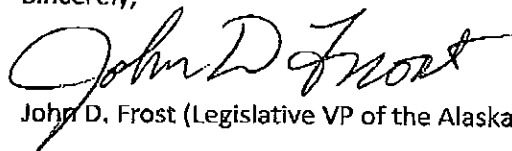
Bear baiting has been approved by voters (57% opposed the initiative to ban baiting in 2004); Certified by the Board of Game as a method of take not in any way a biologic issue and an allocation of at least 1,000 bears to bear baiters has been provided by the Board of Game. Because of this strong Board of Game policy and public support for the practice we should make it relatively easy for a person with the proper credentials and training to obtain a baiting permit. Certainly with the computer links that the ADF&G enjoys a person should be able to obtain a permit in person in any ADF&G office for any other area of the state. Better yet a properly qualified hunter should be able to get a permit over the internet or by mail.

The Board of Game may decide that additional conditions should be applied to bear baiting permits. Examples might be a report at the end of the baiting season stating how many bait locations were established, how many were actively used by bear, how many bear were seen, how many were shot at, how many were wounded, how many were killed, how many different hunters actually hunted from the bait location and a reasonably accurate location of the bait station. If such a report is helpful in managing black bear hunting it should be a condition imposed by the Board of Game after due deliberation and should be applied statewide as part of 5AAC 92.044. It should not be left up to the discretion of local game managers who may be trying to restrict or limit bear baiting.

Proposal#26 Adopt if reasonable. The Alaska Bowhunters Association does not have the specific biologic data available to ascertain if there is a harvestable surplus of goats in this area. However if the area is currently closed to all goat hunting and there is a harvestable surplus of mature goats and if an archery hunt could be allowed without restricting rifle hunters opportunity then the Alaska Bowhunters Association would be in favor of allowing such a hunt on a permit basis. We believe in the wisdom and knowledge of the local advisory committee and doubt that they would have purposed this hunt if it was not feasible.

Thank You for your consideration of our comments.

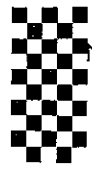
Sincerely,



John D. Frost (Legislative VP of the Alaskan Bowhunter's Association)

RECEIVED TIME OCT. 23. 4:52PM

COMMENT# 25



M :

FAX NO. :

Oct. 23 2008 10:27PM P1

PO Box 627
Skagway, AK 9984
(907) 612-0707
October 23, 2008

Kristy Tibbles
Alaska Dept. of Fish & Game
Board of Game Comments
Po Box 115526
Juneau, AK 99811

RECEIVED
OCT 23 2008
BOARDS

Dear Ms. Tibbles:

I am writing this letter in support of the attached proposal from John Warder of Skagway, to write a new regulation that will protect any 'Spirit Bear'. I was at the F&G meeting in Skagway, after the unfortunate incident this summer when a local resident killed a bear that was supposedly 'Protected'. I think most people in Skagway were confident in the belief that Alaska Fish & Game regulations were adequate to protect this unique member of the local population. We were extremely disheartened to learn that someone knowingly broke the law and killed this animal. To heap insult upon injury, we learn that this person was immune from prosecution because F&G would not enforce a regulation that it wrote, and the hide was even returned to the hunter.

I am a hunter. I believe it is everyone's right to feed themselves and their families, and I am not necessarily against hunting for sport. I also believe that a person has a right to defend himself, his property, and his family. I do not think it is too much to ask to protect such an unusual bear, with the hopes that it has the chance to breed and strengthen the gene pool. Who knows, in 20 years maybe there will be enough of them around to support a harvest.

Steps should be taken to make sure something like this doesn't happen again. I think that this proposal is very reasonable, and the language seems like it is a much more enforceable than the previous regulation proved to be. I respectfully ask that the Alaska Department of Fish and Game consider this proposal, and write a regulation that will help us protect the things that are important to our community. Thank you for your time.

Sincerely,

James McClendon

RECEIVED TIME OCT. 23. 10:21PM

COMMENT# 26

FAX

Date: 10-23-08

From: "Gary Hanson" <mabelg@aptalaska.net>
To: <kristy.tibbles@alaska.gov>
Cc: <jwarder@aptalaska.net>; <madam@aptalaska.net>
Sent: Thursday, October 23, 2008 9:57 AM
Subject: protection for light-phase black bear in Skagway area

Dear Board Director Tibbles,

You are familiar, no doubt, with the recent attempt by the Municipality of Skagway to enact an ordinance to protect the local light phase "spirit bear". You also are aware that after this bear was shot, the ordinance was deemed to be "unenforceable". We support the regulation proposal form as submitted by Skagway resident John Warder. We urge you and the board to establish rules and guidelines, so that in the future, communities will be able to enact enforceable ordinances to protect selected animals.

Thank you,
Gary Hanson
Nola Cole
Mile 1 Dyea road
Skagway Ak

10/23/2008

RECEIVED TIME OCT. 23. 4:14PM

COMMENT# 27

Attn: Kristy Tibbles Fax:907-465-6094

RECEIVED

OCT 23 2008

To The Department of Fish and Game Board:

I'm writing to you in regards to the "spirit bear" that was shot in Skagway this passed summer. I'm sure you all have heard the story and I might not shed any more light on it, but I would like to comment for the record about the event.

The bear was very light if not white, at times, to look at. Sure, after it is shot and dead and laid out in front of you, you will likely see more color variations. But make no mistake, this bear was light colored and a treat if not a privilege to observe. I personally observed and photographed this animal for three years. I would also like to steer away from the use of the word "phased". A "phased" colored bear is a bear that changes color over a period of time. Unless you track a bear from year to year, it is difficult to know whether an animal is "phased" or permanently colored. In the case of this bear, it was born white/light and remained that way till it was shot dead, three years later. Since it never changed color it is not known whether or not it was a phase or not. That is why we need to stay away from the description of "phased". A bear is light, creamy, black, cinnamon, brown or not. It is either one color or it is another. One is never sure whether or not a bear is about to change color or not.

In any case, Fish and Game took it upon the request of the Municipality of Skagway to protect this bear. It was neither protected in life nor death. Fish and Game was scared of the potential law suite it might face and so decided to let the whole thing pass. Well, it has passed, but there are many people out there that are still upset at the lack of action DFG took prior to the shooting and the lack of enforcement after.

I feel that it is important for the DFG to draft a regulation that is clear in language and enforceable.

I know that this bear was rare for its color and no other reason, but that is enough. There are many bears around that can be shot for sport and subsistence. There is no reason we have to include unusually beautiful animals in that category. The hunter has a right to hunt bears, but the non hunter has a right to view wildlife. In this situation, both goals can be achieved through enforceable regulation.

We now have another chance at redeeming ourselves. There is another white cub that is in the Skagway area. A yearling that is most likely from the same parents. This is rare indeed to have two light colored bears in the Skagway area in such a short time frame. The question is, what is DFG going to do to ensure that everyone can enjoy this bear for the years ahead, not just a trophy hunter. I urge you to be the stewards of wildlife we expected you to be when you came into existence. The taking of any life must be seriously considered in this age of dwindling wildlife and habitat.

Thank you,

Sincerely,

Michael Yee
Box 75
Skagway, Alaska 99840

RECEIVED TIME OCT. 23. 6:28PM

COMMENT#

28



Angela Kartes
3705 Arctic #1781
Anchorage, AK 99503

RECEIVED
OCT 23 2008
BOARDS

October 24, 2008

Dear Kristy Tibbles,

As a former resident and current frequent visitor of Skagway, I am writing in regards of the proposal to protect any future "Spirit Bears" in the Skagway area.

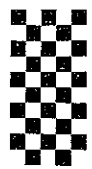
John's proposal requests that the Board direct the Department's biologists to work with the legal regulatory staff to develop language that is enforceable in a court of law to the effect of "A light-phase black bear that has cream coloration (or lighter) over more than 30% of its body may not be taken irregardless of any other coloration."

I believe the above wording will prevent future episodes where a hunter and a community clash due to inadequate "wording". This was a very sad, unfortunate, and avoidable loss of a beloved creature not to mention the mental anguish imposed upon the one who shot the bear. If future regulations are cristan clear this type of occurance will not repeat itself again and the peace and kindness of Skagway and it's residence (including the rare, beloved animals) will be restored. No one is asking for a ban on hunting, just a legal, enforceable protection of such a beloved and rare Spirit Bear---leaving something special to be cherished by all who live in and visit Skagway. It is truely unfortunate this event even occured. Please help in any way in your power to prevent it from happening again.

Thank you for your time and consideration of any future Skagway "Spirit Bears" -- a light-phased black bear with cream coloration (or lighter) over more than 30% of its body (just to be sure you know what I'm refering to),

Angela Kartes

Angela Kartes



FAX

Date: 10-23-08

From: "aliceauburn" <aliceauburn@aol.com>
 To: <kristy.tibbles@alaska.gov>
 Cc: "Jan Wrentmore" <madam@aptalaska.net>
 Sent: Wednesday, October 22, 2008 5:55 PM
 Attach: fishandgame.jpg
 Subject: SPIRIT BEAR

RECEIVED
 OCT 23 2008
 BOARD

Dear Kristy,

I have just been informed that our dead line for comments about our beloved Spirit Bear is this Friday. I am writing as a concerned citizen and friend of the Spirit Bear. I was very shocked that the Fish and Game nor the Biologist would enforce the agreed protection order for this endangered species. I agree with John Warder and Jan Wrentmore that this bear needs to be protected and any white phased bear who are this colors of various winter whites, creamy whites, even the blondish white phased over 1/3 of its body regardless of other colors should be protected and this order should be enforced. If it is not enforced this rare species of Kermode/spirt/ghost bear can be annihilated from our planet. British Coloumbia does have a rigid restriction in some of their areas where the bear was first reported as an endangered species. British Columbia is relatively close to Skagway and we have been honored in the fact that somehow this bear has found its way over the glaciers between our borders and mated with two of our black female bears. This particular spirit bear which was shot by Thor Hendricksen , even though he knew it was supposedly protected, was loved by the people of Skagway and it made friends and brought joy to many of our hearts just to see it. Not even two years old it was shot for its pelt which in my opinion was murder. But that being said, if the Rangers and Officials will not discipline the killing of these rare and endangered bears, they will surely be all killed off. This killing not only will kill the bears but also kills our spirits and hope for a better world which these particular bears spur in our unconscious. They have a way of delighting the soul and bringing a new hope for tomorrow. Please please do something to help protect these great creatures that bring integrity of joy of creatures both great and small. They are an embodiment of something rare and special on this planet. We need to take care of them and to punish those who harm them. There will be no way to save these creatures if we set the example that killing them is not punishable. Please make an order of protection which can be enforced to prevent any further killings which hurt us all. I was heart broken as many of my friends in Skagway have been. This bears passing brought disheartening to our humanity and grief for our kindship to this rare creature which we were so proud of having in our midst. We had all adopted him who set eyes on him except for the few killers who have reminded us of our lack of appreciation for creatures unlike ourselves and endangered on our planet. Please help us. Please make hurting or killing them punishable so we can protect them.

Sincerely,
 Alice V Sorrell

RECEIVED TIME OCT. 23. 4:14PM

10/23/2008
 COMMENT# 30

FAX

Date: 10-23-08

From: "Scott Logan" <sslogan@aptalaska.net>
To: <kristy.fibbles@alaska.gov>
Cc: "John Warder" <jwarder@aptalaska.net>; "Jan Wrentmore" <madam@aptalaska.net>
Sent: Wednesday, October 22, 2008 7:26 PM
Subject: Spirit bear protection

Kristy,

I would like to go on record as being 100% in support of Skagway resident John Warder's suggestion that we only allow the hunting of black or only very dark brown phase black bears. This is in an effort to protect the light phase black bear known as a Spirit Bear. Past efforts have grossly failed and was proven so by the harvest of the Spirit Bear in Skagway. A bear which was to have been protected but was lost due to legal loop holes provided by a poorly written, vague and total un-enforceable regulation. Let's try to get it right this time. Thanks for your efforts,

Mr. Logan
 Scott Logan
 Box 686
 Skagway, Ak 99840
 cell 907-612-0111
 sslogan@aptalaska.net

10/23/2008

RECEIVED TIME OCT. 23. 4:14PM

COMMENT# 31

FAX

Date: 10-23-08

From: "Nola L" <borealight@yahoo.com>
To: <kristy.tibbles@alaska.gov>
Sent: Thursday, October 23, 2008 11:54 AM
Subject: bear protection regulation

It was with great sadness that we learned this spring that Skagway's white-phase Spirit Bear had been shot and the regulation that the Board of Game had written at the community's request proved to be unenforceable.

I support John Warder's proposal requesting that the Board direct the Department's biologists work with the legal regulatory staff to develop language that is enforceable in a court of law to the effect of "A light-phase black bear that has cream coloration (or lighter) over more than 30% of its body may not be taken irregardless of any other coloration."

Nola Lamken
PO Box 624
Skagway, AK 99840

907-983-3806

10/23/2008

RECEIVED TIME OCT. 23. 4:14PM

COMMENT# 30

RECEIVED
OCT 24 2008
SOARER

9350 View Drive
Juneau, Alaska 99801
October 22, 2008

Board of Game Comments
ADF + G Board Support Section
FAX # 907-465-6094

Dear Reader,

As a member of the Mendenhall Wetlands State Game Refuge Citizen Advisory Group and a public member of the City & Borough of Juneau Parks and Recreation Advisory Board, I am interested in several local issues coming before the Board of Game at the November meeting. Following are the Proposals on which I wish to comment:

Proposal 15: I oppose the extension of Beaver trapping by 3 weeks in Unit 1C. There is no biological justification for this action and it could be detrimental to the Beaver population. A scientific study should precede any change in the current season (Dec. 1 - May 15).

Proposal 16: I oppose this even more extreme expansion of the Beaver hunting/trapping season by 4.5 months in Unit 1D as very likely to have a negative impact on the Beaver population.

- 1 -

Proposal 17: I oppose allowing "bounties" on Beaver in Unit 1D. How could effective regulation take place? Where would the money come from? Such an incentive could result in things getting out-of-hand, endangering the species.

Proposal 21: I oppose narrowing the protective corridor near Juneau trails to allow trapping closer to the trails. Both persons and their pet dogs would be at risk. This is a public safety issue.

Proposal 22: I support adding the 1/4 mile protective corridor against trapping to the following trails: Amalga, Auk Nu, Eagle Glacier, Pt. Bridget and Salmon Creek. Again, it is a public safety issue for persons and their dogs.

Proposal 23: I support this proposal to appropriately describe and label the cream-colored Black Bear and protect this unique wildlife resource from hunting in Unit 1C or 1D. The devastating circumstances which resulted in the taking of Haines' Spirit Bear should not be repeated.

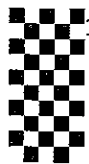
Proposal 24: I oppose the extension by 2 weeks of Spring Brown Bear hunting in Unit 1C. The vulnerability of these bears to hunters in this intertidal/coastal area is similar to the reknown problem near the Stan Price cabin on Admiralty

Island. The bears are too easily seen and shot. It is not ethical sportsmanship and is inconsistent with the conservation of Brown Bears as a species.

Proposal 31 } I oppose both of these
Proposal 45 } proposals in Units 1 and 2
because the unintended consequences would be disastrous. Extending the wolf hunting and trapping seasons would predictably endanger pregnant females and orphaned wolf pups. It is inhumane.

Thank you for your consideration.

Yours truly,
Dixie A. Hood



Brennon Eagle
PO Box 576
Wrangell, AK 99929

Board of Game, ADF&G
Boards Support Section
PO Box 115526
Juneau, AK 99929

RECEIVED
OCT 24 2008
BOARDS

RE: Comments on Proposal 10 and 11 for Fall Meeting

Chairman Judkins:

I am the author of Proposal 11 which would change the legal antler configuration for the RM 038 moose hunt. The department has submitted Proposal 10 for this meeting which has the same intent as mine but is worded better and I am fully in support of their proposal as they submitted this.

The main reason to change the regulation and to allow the harvest of bulls with 2 brow tines on each side is that this will bring the legal antler requirements for this hunt in line with the management theory that is used in the rest of the state where an antler restriction is used. This needs to be done because we have a different moose in Southeast than the rest of the State has. This theory as I understand it allows the harvest of some yearlings and then by the time the moose reach 5 to 6 years of age all of the bulls should have an antler configuration that makes them legal for harvest on the large side. Once bulls reach this age they are surplus to the population from a breeding perspective as prime mid-age bulls can fulfill the breeding requirements.

Changing the antler configuration as the department has proposed would allow us access to these older bulls. The data from the any bull tags from the past 4 years shows that most of the bulls with the 2 brow tine configuration fall into the category of an older bull and should be in excess of the amount of bulls needed for good breeding. With the current antler configuration it is felt by many of the hunters that many of the older bulls never attain the correct 3 brow tine configuration so we have bulls dying of old age that have never been legal for harvest with the current regulation.

Changing this regulation will work as the population naturally fluctuates because as the numbers go down the prime breeding bulls will still be protected and as the population goes up the older bulls will increase and will be legal for harvest. With the adoption of this proposal I am in favor of removing the any bull drawing hunt that we conduct currently. This is very much in keeping with the wishes of Wrangell as they have been consistently stated over the years that we want access for everyone to this hunt.

Thank you for your consideration of this proposal.

Brennon Eagle

ATTN: BOG COMMENTS
Alaska Dept. of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
FAX: 907-465-6094

RECEIVED
OCT 24 2008
BOARDS

PROPOSAL 46 Opposition

When the Board of Game lengthened wolf season in Units 1,3-5, the intent was to increase hunter access to a huntable wolf population, thereby, increasing annual wolf harvests, and doing so, in, a politically correct and fiscally responsible way. As sponsors of Prop. 46 point out, when population management of wolves is left to the government, it can become costly, (\$824,000.00 1975-1983) and somewhat unsavory, (aerial hunting by helicopter).

Being a Juneau sportsman for over 30 years, and knowing many Juneau hunters, I believe most of us deem any adult wolf to be the ultimate S.E. big game trophy, prime or un-prime, rubbed or un-rubbed. Period! Very few of us will ever get a chance at harvesting this highly elusive critter. Every extra day, spring or fall, we have available to hunt, may bring us the less than once in a lifetime chance at this most valued game animal.

As for boosting wolf numbers around Glacier Bay, Misty Fjords and Wrangell- St. Elias Parks, they have been closed for years to the taking of wolves, need we do more?

Wolves should be continued to be managed as big game, fur bearers, and predators. They are, all three. The lengthening of the season in 2004 is an effective means of attempting to regulate the wolf population in S.E., whether you call it "de facto wolf control", or not.

Sincerely,
Pete Nelson
PO Box 211271
Auke Bay, Alaska 99821

COMMENT#

35

Michael W. Tobin
PO Box 33578
Juneau, AK 99803
October 23, 2008

BOG Comments
ADF&G Board Support Section
Juneau, AK

SECRET
LAW ENFORCEMENT
BOARDS

The following are my comments on some of the proposals for the November 2008 meeting:

Proposal 15 Oppose. An extended season on beaver could be detrimental to the population. There are currently no bag limits on the Dec. 1st-May 15th season.

Proposal 16 Oppose. Lengthening the beaver hunting/trapping season by 4 ½ months would likely be detrimental to the population.

Proposal 17 Oppose. Bounties are a bad idea, a step backward in game management. Who pays?

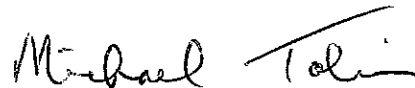
Proposal 24 Oppose. The current season for brown bears in unit 1C offers plenty of opportunity for spring bear hunting. Extending the season can put this slowly regenerating species at risk

Proposal 31 Oppose. Extending wolf hunting season by two weeks (to May 15th) in unit 1D needlessly risks killing nursing females, and thereby that years litter.

Proposal 45 Oppose. Same argument as Proposal 31 above. Involves units 1 and 2.

Proposal 46 Support. This proposal would take wolf hunting season back to where it was until one of the last few board cycles. In August and April wolf hide quality is poor. Also hunting wolves in April means shooting some pregnant females, and in August means killing adult wolves on whom pups are still dependent.

Thank you,
Michael W. Tobin



10/23/08

RECEIVED

NOV 2 3 08

BOARD

BOG Comments
ADF:G Brand Support Section
Po Box 115526
Juneau, AK 99811-5526

Dear Board of Game,

Thank you for the opportunity to comment. I am in my mid-60's and have been a lifetime walker (since 2nd grade) and appreciator & observer of wildlife & the beauty of nature. As good stewards of the earth, I appreciate all of you taking my values into consideration as you manage our wildlife. Making sure that we have wildlife to view brings economic & spiritual return on investment to us Alaskans & to those who visit our state.

Here are 2 propositions that I suggest:

#23: Please vote to support protecting these special cream colored bears. They have great value as animals & view

#46 - Please decrease the wolf hunting seasons by 2 months. In April, pregnant wolves will be killed. This inhumane act is not part of sound animal conservation. The value of their fur in April: Sept is worth less. No return on investment here.

COMMENT# 37

I oppose:

Prop 15: Please don't extend the beaver season. Please don't jeopardize the overall beaver population.

16: This is extreme. Likely a detrimental extension.

17: Bounties are expensive. Bounties are historically detrimental to targeted population. No return on investment.

24: Bears are too vulnerable as the feed in mudflats. No sportsmanship. More important to conserve brown bears. Please don't extend season.

31: Killing wolves in May jeopardizes wolf conservation. Pups likely won't survive by killing the parents. No valid evidence that moose population is under threat. Please don't extend the hunting/trapping season.

45: Same pts. Please don't extend wolf season by one month to May 31st. Save some wolves for me to see or hear or find scat. Because of my ^{work} schedule, I walk my dogs late at night and have had many marvelous meetings with wolves and bears and beavers. My heart, mind, spirit and body are nourished by these encounters.

Thank you for considering these perspectives.

Sincerely,
Erin B. Davis

Lin G. Davis
3099 Nordell Ave
Juneau, AK 99801

COMMENT# 37

RECEIVED

OCT 24 2008

(3 PAGES) 11:45AM 10/24/08 (BLACK BEAR SEASON)
 Attn: Alaska Board of Game Fax# 907-465-6094 (PROPOSAL # 36 COMMENTS)

As an Alaskan Master Guide with 18 years in the SE. AK. Region, in regards and response to proposal 36, reducing Black Bear season by 14 days in the fall from Sept. 1st to Sept 15th, I provide the following. The closure is premature and not justifiable at this stage and will be a hardship for my long established rural Alaskan business, and those businesses and Alaskan residents that support my business.

The Brown Bear season opens each fall on September 15th. So the closing of the first two weeks of September Black Bear season, eliminates my opportunity to hunt fall Black Bear as a single species, as we now do and have done always. This will affect same any Brown Bear Guide operator in SE. AK.

The overharvesting of Black Bears, and or the concern of is not the result of the guided hunter activity. It is a direct result of the non-resident transported do your own hunt group. By eliminating the first two weeks of the season, you will create and be imposing a more than significant burden and hardship on the guided hunt industry. One by guides having to refund clients for deposits already received for future hunts, and two total loss of Guided Black Bear hunts for the fall or Sept. Season. While it does not put any burden on the transporter or do it yourself type of hunter.

In following if this takes affect and we lose the first two weeks of our Black Bear season I and other Priority use guides would be losing a portion of my- our- US. Forest Service priority use allocation for non-use, which would then most likely be re-allocated to most likely a transporter type of business who have been responsible for the significant hunter increases.

There isn't any real scientific reason or justification at this time to shorten the existing season dates. The existing **Black Bear population in SE. Ak. is still above the 10 year average.** The ADF&G does not have an established harvest directive for GMU 2.

Not having a good record analysis (There Isn't Any) of hunter effort, we don't know things such as amount of hunter effort, harvest and success rates, or knowledge that hunting is or if it is how it is affecting the Black Bear populations.

It is very important that we all work together to help gather the information needed. I recommend a registration hunt, or a fairly extensive hunt report type of hunt to allow this information to be taken and define the hunt impact. The harvest /hunt report needs to contain a penalty for non-reporting, such as lose hunting license or privileges in AK. for the next 2 yrs etc.

The wounding issue needs more attention, and should be worded in a very distinguished manner on the report. Wounding loss = bag limit for the year. I believe that in the non-aiting requirements guided sector wounding loss is fairly hi, and they don't adhere to the wounding loss law.

A number of them end up harvesting 2 or 3 bears in this fashion.

COMMENT#

38

RECEIVED TIME OCT. 24. 11:51AM

The Black Bear harvest has declined each of the last 3 years, the contributing factors are,
#1. The US. Forest Service has capped the number of guide businesses allowed on FS. Lands.

#2. With several new regulations in affect for the transporter industry in conjunction with a excellent effort by Alaska State Troopers, the FS. And Dept. of Comm. To enforce these regulations has weeded out a number of illegal commercial operators. This has resulted in a noticeable reduction of transporters who were operating outside the law.

#3. The weather the last few years has naturally declined hunter numbers, along with low fish numbers, displacing bears from normal hunting areas. Also in affect is the poor economy and hi gas price's, all leading to less hunters.

#4. With all logging on the decline, and the new growth or canopy crowding the clear cuts, so visibility is lost also relates to less harvest and will continue to do so.

#5. With better requirements and accountability on Black Bear Baiting, there is less illegal activity at bait stations, and has reduced take. Proposal 41 is a good one and I support it, to keep very good accountability of bait stations.

Since I get our use permits from the Forest Service, I have heard discussion from them in regards to funding ADF&G for gathering better data on Black Bear Hunting. We need to assure this happens and have the two agencies working together.

I would like to support proposal #47, it is a good proposal and one that has despirately been needed in SE. AK. for the 20 years I have been here, please consider passage of this proposal.

Bruce Parker
Parker Guide service
P.O.Box 6290
Sitka, AK. 99835
PH# 907-747-6026
e-mail akguide@ptialaska.net
www.alaskaboathunts.com

PARKER GUIDE SERVICE (SITKA AK)
October 23, 2008

~~██████~~ ALASKA BOARD OF GAME BLACK BEAR HARVEST GRAPH
UNITS 1-2-3

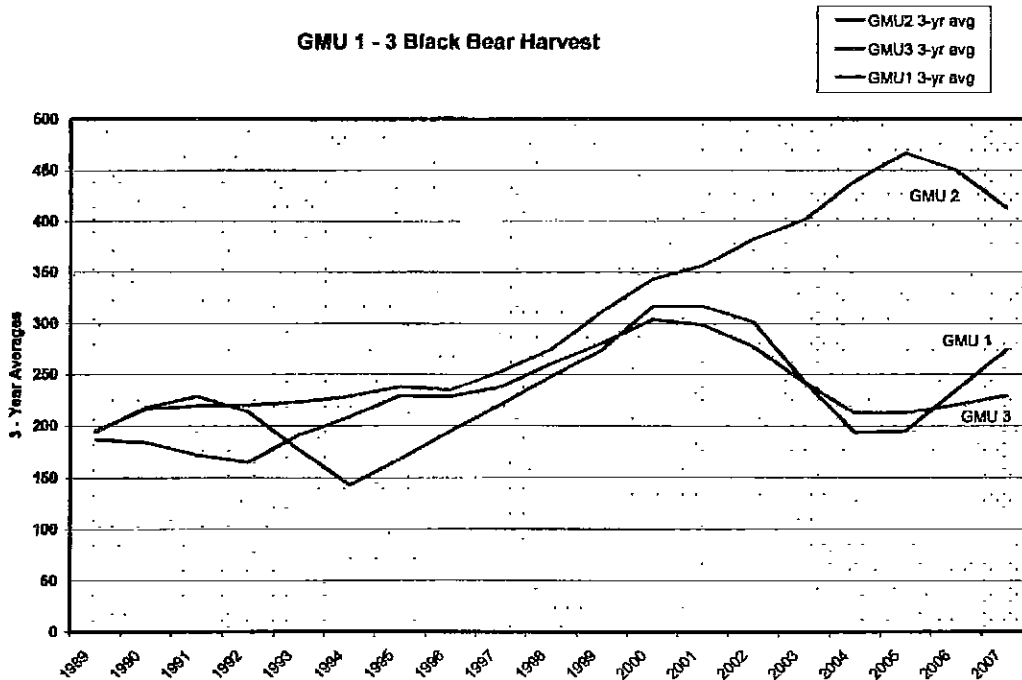
I thought this might be useful to you to see before the conference call today. I averaged the black bear harvest data for GMU 1 through 3 over 3-year averages since ADF&G usually is concerned with average data rather than individual years. Then, I looked at trends over the recent past.

For GMU1, taken as a whole, 1987 through 1997 long term historic harvest was something like 200 bears. Harvest peaked in the years 1997-2003 in the range of 300 bears. The past 5 or 6 years the numbers are lower, averaging around 230 bears but the recent trend is increasing at 10-20 bears a year.

For GMU 3, 1987 through 1997 harvest level was roughly 200 bears. Harvest in this area also peaked in the 1997 - 2002 years to around 300 bears but has since declined to the 220 range and is fairly steady.

GMU 2 harvest was level in the early years, around 220 bears, until 1995 and then steadily increased through 2005, reaching a peak that year of 486. It has come down the past couple of years significantly. 2007 - (360) - 126

Here are the 3-year averages in graph form



BOG COMMENTS 907-465-6094 FAX

COMMENT# 38



LAW OFFICE OF KNEELAND TAYLOR, P.C.

425 G Street, Suite 610
Anchorage, AK 99501
907-276-6219 telephone
907-279-1136 FAX
email: <kneelandt@alaska.com>

Admitted in Alaska

October 24, 2008

Alaska Department of Fish and Game
P. O. Box 115526
Juneau, AK 99811-5526
FAX 907-465-6094

Attention: Board of Game

Re: Fall Meeting, 2008
Proposals 8 and 34

Dear Board Members:

Here are my comments:

PROPOSAL No. 8: SUPPORT BUT WITH ADDITIONAL RESTRICTIONS.

This proposal by the Department should be not only approved but protections for marten on Kuiu Island should be strengthened. In particular, all marten trapping on Kuiu Island should be halted until such time as the continued viability of a substantial population of *Martes caurina* can be confidently assured.

The information provided in the BOB proposal book is alarming. The Department's biologists report that *Martes caurina* inhabit only two islands in the archipelago (Admiralty and Kuiu), and that there is very substantial evidence that *Martes caurina* is on the verge of extinction on Kuiu Island. The Department's comments also indicate that it is the Department's opinion that closing the marten season entirely "may eventually be a necessary step...".

The Alaska constitution and the statutes that govern the rule-making authority of the BOG make it absolutely clear that species should not be made extinct because of over harvesting by trappers. In other words, the continued trapping of marten on Kuiu Island should not be permitted. Period.

RECEIVED TIME OCT. 24. 12:59PM

COMMENT# 39

If continued trapping is authorized, I presume that the next step would be litigation under the endangered species act. Hopefully, the ADF&G will act proactively. That means aggressive steps to assure the continuation of substantial populations of *Martes caurina* on Kuiu Island. Those recommended by the Department are insufficient since they allow continued trapping of Marten.

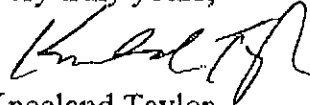
PROPOSAL 34: SUPPORT BUT WITH ADDITIONAL RESTRICTIONS.

Proposal 34 would reduce the trapping season for wolverine so as to end it in Units 1-5 on February 15. This is a good idea, but there should be additional restrictions, in particular, there should be a bag limit of one wolverine per trapper per season.

Department biologists report in the BOG proposal book that the current regulations have (and will continue) to allow the trapping of wolverines to the extent that wolverine numbers may be reduced to unsustainable populations in those portions of Southeast Alaska that are relatively isolated from sources of dispensers. This situation is alarming and calls for aggressive measures to preserve sustainable populations of wolverine in all of Southeast Alaska.

Our constitution and the applicable statutes require the preservation of sustainable populations of our wildlife. It is gross negligence if the Board fails to take appropriate regulatory action to save this species throughout all of Southeast.

Very truly yours,



Kneeland Taylor



Muskeg Excursions
PO Box 9513 Ketchikan, Ak
99901

RECEIVED
OCT 24 2008
BOARFINS

1) Comments on Proposal 36 Submitted by ADF&G the one that would reduce the fall black bear season by 14 days from Sept. 1 current to Sept. 15 proposed.

I OPPOSE this Proposal

1. The proposed reduction in black bear season dates is not justifiable at this time and creates a hardship for my long established hunting Guide business on Prince of Wales Island and those rural businesses and several Alaska resident employees who help me to support my business.
2. Closing of the Sept. 1-15 portion of the black bear hunting season would be devastating to Muskeg Excursions. Historically I have booked from 1 to 4 hunts during this first of September time frame.
3. The concern of overharvest of black bear in GMU 2 has not been a result of the guided hunter activity but more a result of the transported and do it yourself type of non-resident hunt. However, by eliminating the first fifteen days of the season you will be imposing a significant hardship on the guided hunt industry and not any real burden on the transporter or do it your self type of hunter.
4. ADF&G does not have an established harvest directive for GMU 2. There is not solid population data.
5. There is no good record analysis of hunter effort. We do not know the amount of hunter effort, past or present, harvest success rates or have the knowledge that hunting is actually affecting or how it is affecting the black bear populations.
6. It is very important that we work together to help gather better science and harvest information therefore I support a registration hunt or an enhanced harvest report type of hunt to better define the hunting impact.

PAGE 1

COMMENT#

40

It is documented (by ADF&G) that the harvest of Black Bears has declined in GMU #2 in the last 3 years.

As one who knows allot about the GMU 2 Black Bears (I have been a resident of this area since 1979, started fresh water fishing guiding in the early 1980's, operated a Black Bear fleshing and expediting service in the mid 1980's and became a licensed hunting guide in 1988) I have opinions on why the harvest of Black Bear has declined.

ENFORCEMENT: Fish and Wildlife Troopers have made significant headway regarding illeagle activity and holding hunters accountable. Many Transporters (legal and illeagle) have curtailed their activity due to the increased enforcement and recent changes in Transporter Law. Equals less Bears killed.

BAIT SITE REGISTRATION: The new requirement to register the bait site in person in Ketchikan has made a some impact on the non-resident hunter and the illeagle activity associated with Baiting. Equals less Bears killed.

LIMITING THE GUIDE/OUTFITTERS by the USFS: In 2007 the USFS has allocated the number of guide/outfitters that can conduct hunts on their lands and has also limited us to a specific number of hunts that we can conduct. No more guide/outfitters have been allowed to guide that did not show a historical record of guiding prior to 2007. No additional Bear to existing permits. Equals less Bears killed.

HABITAT LOSS: The vast logging that has occurred on POW in past years has slowed dramatically. Those clearcuts are becoming over grown with brush and reprod and visibility is becoming difficult. Equals less Bears killed.

LATE WINTER WEATHER: For the last two springs we have had deep snow blocking roads into late May. Possible late emergence from the dens. Equals less Bears killed.

There are several factors on the horizon that I think will continue to reduce the Black Bear kill in GMU 2.

REGISTRATION HUNT: I think a Registration hunt will be intimidating to some non-resident hunters causing them to cancel their GMU 2 hunting plans. Equals less Bears killed.

ECONOMY: With the current poor economy and rising prices in everything from airline tickets, ferry fare, fuel and groceries I believe non-resident hunters will not be hunting Black Bear in GMU 2 at past levels. Equals less Bears killed.

ENFORCEMENT: Continued enforcement in the Transporter arena and Bear Baiting will have a continuing effect. Equals less Bears killed.

PAGE 2

COMMENT#

40

RECEIVED TIME OCT. 24. 1:29PM

- 2) Comments on Proposal 4 submitted by B. Warmuth Modifying bag limit for Mt Goat in Unit 1A.

I am OPPOSED to this Proposal.

I have hunted and Guided Mt Goats in GMU 1A since the early 1990's. Even though there is not a population problem with Mt Goat in that area I believe that the nursery groups would take the brunt of reinstating the 2 Goat limit we have had in the past. Mt Goat is not the meat hunt by Ketchikan residents it used to be with the price of air travel the way it is now.

- 3) Comments on Proposal 5 submitted by K. & A. Vorisek Black Bear Bait permit changes for GMU 2.

I am OPPOSED to this Proposal.

I agree with ADF&G with the requirements that have been in place for the last two seasons. I know that the new requirements have slowed down some the illegale activity taking place at baits. Those rules also hold baiters more accountable for their actions.

- 4) Comments on Proposal 37 submitted by J. Rosenbruch Establishing a Registration hunt for Black Bear.

I SUPPORT this Proposal.

In the current Black Bear issues that face us in SE I do believe we need as much solid data that we can get. A Registration hunt generates much needed information with 100% compliance required by law.

As for funding this I have heard the USFS advocate funding support for ADF&G for better data gathering on Black Bear for the current ongoing USFS carrying capacity analysis. It would be good to see the two agencies working together on this.

I want to thank you all for all your time and effort in these very important matters.

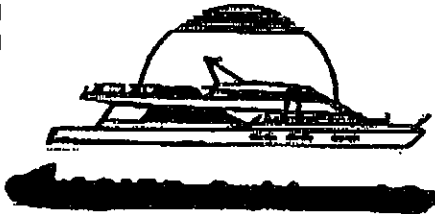
Johnnie Laird

Johnnie Laird Registered Guide # 861

PAGE 3

COMMENT#

40



MARYANN ROSENBRUCH, Alaska Guide & Outfitter
 JIMMIE L. ROSENBRUCH, Alaska Guide & Outfitter
 ALISHA L. ROSENBRUCH, Alaska A. Guide & Outfitter
 P.O. Box 219 Gustavus, Alaska 99826 (907) 697-2252 (Phone/Fax)

██████████ * ██████████

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10/24/2008

October 24, 2008

BOARDS

Alaska department of Fish & Game
 Boards support section
 BOG November 7-11, 2008 Meeting

907-465-6094

Please include the following response to proposals for Board review:

proposal 13 Wolf seasons (submitted by Jimmie & MaryAnn Rosenbruch) Change
 proposal to season August 1 - May 31 (Not June 30).

proposal 41 Black Bear Baiting (Submitted by ADF&G) Provide requested authority to manage Black Bear baiting. Request the Board reconsider the issue of Black Bear Baiting in GMU 1-3. Black Bear are a valuable, highly sought after high trophy quality and hunting experience in the rain forests of South East Alaska. There is no over-abundance or predation issues with ungulates by Black Bear in Southeast Alaska Baiting Black Bear in SE Alaska creates a high probability of unaccounted wounding loss, ie. resistance to leave the "stand" to search for an animal not dispatched in sight for concern of disturbing the bait area by moving about. Hunters are usually alone on a bait stand with decreased accountability of adhering to the wounding loss regulation. Baiting is considered by the majority of the general public and other hunters as non "fair chase" and unethical.

proposal 37, 38, 39 Registration hunt, Harvest Tickets, Hunt Reports for Black Bear GMU 1-5 (submitted by Jimmie C. Rosenbruch, ADF&G, APHA) Insufficient information for scientific based management plan. Harvest ticket must include hunt report with citation for non-compliance. Hunt Report must contain all information now required on GMU 4 Brown Bear Registration hunt report plus type of service provider (ie, guided or transported). Current Brown Bear hunt report requests "number of bears wounded"?? How can there be a "number of bears wounded" with current wounding regulation? I have requested ADF&G change this each year for many years to request "Did you wound and not recover a bear"? participation with the U.S. Forest Service in developing hunter report information would also assist in the development of prospectus and permanent commercial allocation of the resource by USFS. In the past the USFS has indicated a willingness to participate in the funding of the information gathering process. (personal and public discussions with Petersburg District Ranger and other USFS officials). (Please note attached SE Black Bear Harvest Chart 1987-2007).

proposal 36 Black Bear Close September 1-14 GMU 1-5 (Submitted by ADF&G) ADF&G Black bear harvest data 1987-2007 indicates a decrease since 2005 including preliminary 2008 data. This indicates reduced hunter effort. Another significant factor, particularly in GMU 2 and 3 is the extensive clearcut portions of both units. Forest canopy closure has been and will continue at an accelerated rate as conifers shade out undergrowth in approximately 8 to 10 years. This contributes very significantly in reduced sightings of Black Bear. Black Bear also become very nocturnal with hunting pressure, and other human activity contributing to fewer bears seen.

The USFS has imposed a moratorium on any new commercial operators and has limited commercial operators for many years with fixed numbers of hunts.

COMMENT# 41

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several major illegal transporter and guiding without a license operators have been convicted, with a noticeable reduction of activity.

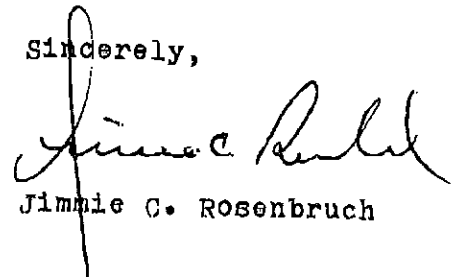
proposed ADF&G solution to close fall Black Bear in GMU 1-5 until september 15 eliminates traditional historic and priority use commercially allocated by the USFS in GMU 1-5 by Brown Bear Guides that begin hunting Brown Bear opening Sept. 15th. Reallocates all the Black Bear resource to other users. This means a permanent loss of approximately 40% of the total Black Bear USFS permitted priority hunt allocation to Guide/Outfitters due to non-use during the September 1-14 proposed ADF&G closure.

This penalizes and may put out of business legitimate operators outside of the problem area.

A significant ^{REDUCTION} of annual income and refund of deposits for 2009 and 2010 hunts booked for September 1-14 may force some long term operators out of business. Loss of employment, Air Charter Service, and purchase of supplies and fuel impacts local businesses.

Thank you very much for the opportunity to comment.

Sincerely,

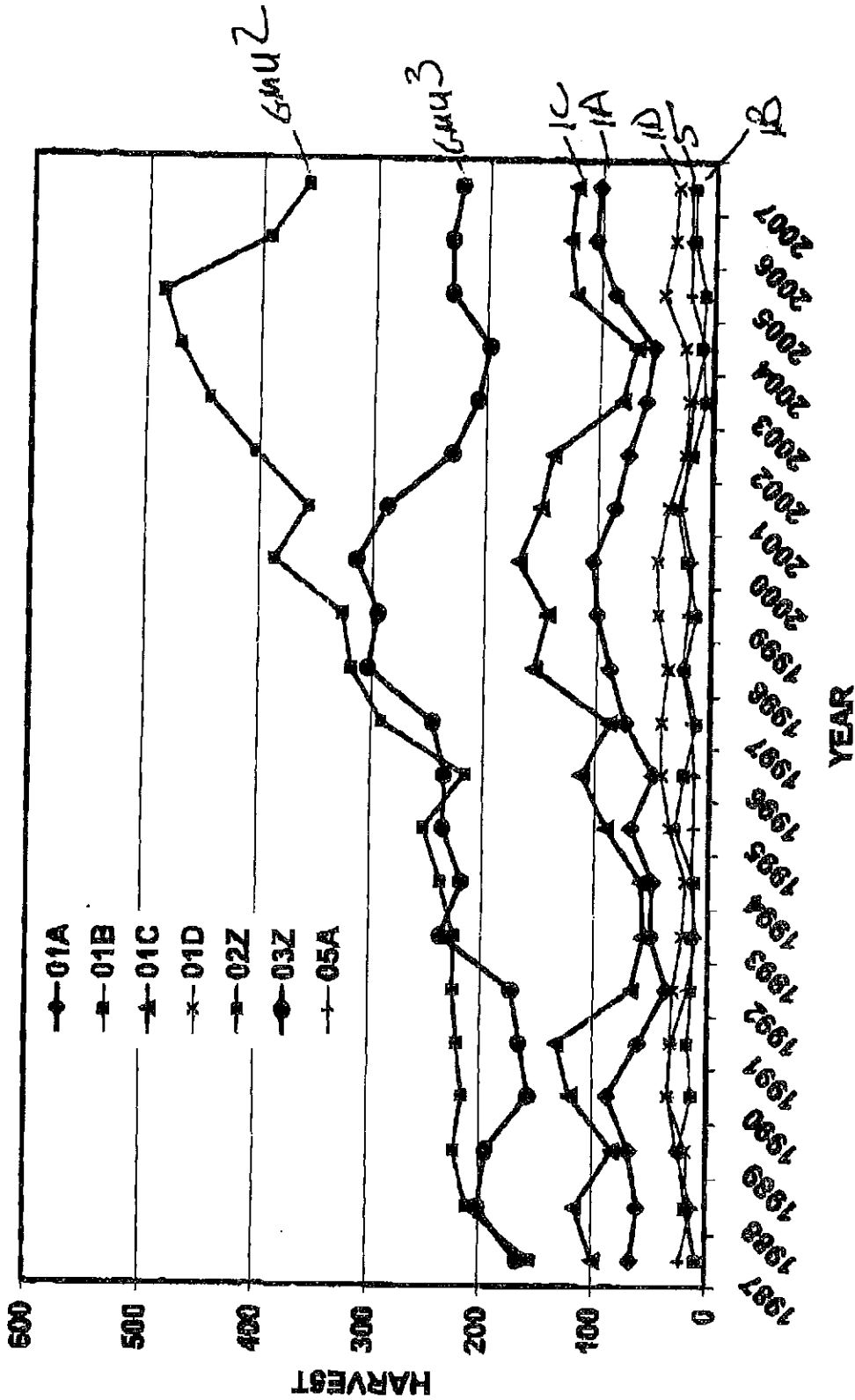


Jimmie C. Rosenbruch

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COMMENT# 41

Southeast Black Bear Harvest (1987-2007)





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OCT 24 2008
BOARD

Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526
(907) 465-6094 Fax

October 24, 2008

Please include the following response for Board review:

Proposal 36 Black bear close September 1-14 GMU 1-5

I've not seen evidence to support such a drastic change to what I depend on to support my family! Please consider the limited time the resource is available for a successful hunt! Fish is their natural food to attract the bears and the later the more likely there will be no fish and inclement weather as well as less likely our clientel are willing to come. Has there been consideration on how much more Spring pressure this would create? Our season and Forest Service allowcation is limited and seems to be being pinched into a time frame that could finish the "little guy"! Timing is everything! Fuel prices, bussiness closing and our economy may take the toll on harvest levels your looking for all and in itself! Is there any consideration of the two bear harvest for residents possibly before cutting our already limited fall season?!

Thank you for your consideration and for the opportunity to comment!

Jimmie "Bud" Rosenbruch
Master Guide/Outfitter

8144 Pinewood Drive Juneau, Alaska 99801

Ph: (907) 790-4687 • Fax: (907) 790-4600 • Email: akhunter@ptialaska.net • website: www.southeastalaskanadventures.com

COMMENT# 41

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**Proposal 16 and 17:
Opposition**

Observations made by those who spend time in the region are an important and contributing source of information toward wildlife conservation. Such information can raise flags or catalyze further investigation but ultimately management decisions should be based on documented scientific information which considers multiple variables and is collected over time.

The issue listed for Proposal 16 and 17 is "over population of beaver in the Chilkat Valley," but this has not been established or studied in any measurable way. The true impact of beaver-modified habitat on salmon (in spawning or rearing phases) in the Chilkat Valley is currently unknown beyond impressions. The amount and diversity of opinions on this issue indicate that more information is needed before management is applied. Solidifying whether there *is* an issue and what the exact nature of the problem is would serve a better foundation for action.

In addition, whether or not a problem exists, the proposed solution of eliminating more beaver (through a bounty, extended seasons or expanded means) is futile. **It is understood that as a species, removing beavers triggers larger litters in survivors and causes others to resettle in available habitat, making killing more beavers at the rate proposed most probably ineffective toward controlling the overall population. "Reducing the number of beaver," would not happen and therefore would not preserve critical salmon spawning streams as the proposals suggest.**

Furthermore, the positive contribution of beavers to ecosystems, especially riparian zones, is extremely well documented. Beaver ponds are critical for slowing storm-water runoff, trapping sediments, and maintaining summer base flows among other ecological benefits. Studies also indicate that beaver ponds provide advantageous conditions for rearing salmon, where they find more food, refuge from floods and predators. The cost of eliminating these advantages to salmon and many other species in the Chilkat Valley should be carefully considered.

Finally, alternative solutions do exist and need to be explored. Periodic dam destruction in critical areas could be considered during phases of spawning or installing marketed devices for maintaining passages through dams such as *Beaver Deceivers*.

The true nature of the problem has yet to be established, the proposed solution would most likely not be effective, advantages of beaver for salmon may currently be underestimated, and other solutions have not been explored. For these reasons Proposals 16 and 17 would be a poor reaction to the situation.

Andrea Nelson
PO Box 1681
Haines, AK 99827

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COMMENT#

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Alaska Office
333 West 4th Avenue, #302 | Anchorage, AK 99501 | tel 907.276.9453 | fax 907.276.9454
www.defenders.org

**DEFENDERS OF WILDLIFE'S COMMENTS ON THE PROPOSALS
TO BE CONSIDERED AT THE FEBRUARY 29 - MARCH 10, 2008
BOARD OF GAME MEETING IN FAIRBANKS, ALASKA**

October 24, 2008

Via Facsimile: 907-465-6094

Mr. Cliff Judkins, Chairman, Board of Game
Ms. Kristy Tibbles, Executive Director, Board of Game
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, AK 99811-5526

Dear Mr. Judkins and Ms. Tibbles:

Defenders of Wildlife ("Defenders") appreciate the opportunity to submit these written comments on proposals that will be considered at the November 2008 meeting in Juneau, Alaska.

Established in 1947, Defenders is a non-profit membership based organization dedicated to the protection of all native wild animals and plants in their natural communities. Defenders focus on the accelerating rate of species extinction and associated loss of biological diversity and habitat alteration and destruction. Defenders also advocates for new approaches to wildlife conservation that will help prevent species from becoming endangered. We have field offices around the country, including in Alaska where we work on issues affecting wolves, black bears, brown bears, wolverines, Cook Inlet beluga whales, sea otters, polar bears and impacts from climate change. Our Alaska programs seek to increase recognition of the importance of, and need for the protection of, entire ecosystems and interconnected habitats while protecting predators that serve as indicator species for ecosystem health. Defenders represent more than 5,800 members, activists and subscribers in Alaska and more than one million nationwide.

Also, see the attached appendix with 122 Alaska residents that supported the comments on these proposals.

Our comments follow.

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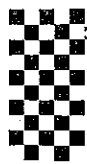
OCT 24 2008

BOARDS

National Headquarters
1130 17th Street, N.W.
Washington, D.C. 20036-4604
tel 202.682.9400 | fax 202.682.1331

COMMENT# 43

RECEIVED TIME OCT. 24. 2:22PM



PROPOSAL 1 – 5 AAC 84.270. Furbearer trapping. Lengthen the wolf trapping season for Unit 1A.

Defenders Position and Comment:

Oppose: There are six proposals that propose lengthening the wolf hunting and/or trapping seasons in various GMUs in southeast Alaska. We strongly oppose all six proposals and recommend that none be approved by the Board.

In November 2002 the Game Board reviewed wolf hunting regulations in southeast Alaska and found that seasons were generally too long and liberal. Certain units had openings in August when wolf pups are still very young and totally dependent on adults. Pups cannot survive if adults are shot in August. Similarly, wolf hunting seasons extended into late spring when females are pregnant and hides are not prime. Shooting wolves at this time wastes a valuable resource—wolves are big game animals and considered trophies by many hunters. Excessively long seasons result in unsound conservation and management practices for one of Alaska’s premier big game species.

The Board acted in 2002 to set hunting season dates of September 1 to March 31 in Units 1, 3, 4, and 5. Subsequently, after appointment of a new Board in 2003, wolf hunting seasons were lengthened in 2004. Seasons were set to open on August 1st and close on April 30th. This was justified by a desire on the Board’s part to increase the wolf harvest as a form of de facto wolf control. In recent years, wolves across Alaska have been viewed by the Board mainly as predators that compete with humans for ungulates. As a result, the Board liberalized wolf hunting and trapping seasons across Alaska in an attempt to provide more ungulates for hunters. In some cases this was done with no regard for the big game or furbearer status of wolves and the value they have to trappers who sell hides or hunters who have a rare opportunity to harvest a premier trophy species.

The Game Board has not issued findings documenting excessive wolf predation on Sitka black-tailed deer, moose or mountain goats in any GMU of southeast Alaska. Nor has the Board found that these ungulates require wolf control programs to increase deer, moose or goat numbers. Nevertheless, the Board lengthened wolf hunting seasons in 2004 with the belief that more wolves would be taken thereby increasing ungulate harvests.

We are aware of no data indicating that excessively long wolf hunting seasons have any impact on deer, moose or goat numbers in southeast Alaska or result in higher human harvests of these species. We recommend that the Board request an analysis of the wolf hide sealing data to determine, unit by unit, what percentage of the wolf harvest by hunters occurs in August and April and whether the number of wolves taken by hunters during these two months is likely to impact deer, moose or goat populations in any unit. We are confident that the results will confirm our contention that there is no benefit to ungulate populations in southeast Alaska by maintaining open hunting seasons on wolves in August and April, and that hunters are not taking more ungulates as a result of the few wolves taken during these two months.

Proposals 1, 2, 12, 13, 31 and 45 all recommend extending the hunting and/or trapping seasons in these units by varying amounts of time. One proposal (13) recommends a hunting season extending to June 30th and reopening on August 1st.

COMMENT# 43

Five of the six proposals mention wolf predation on ungulates as a justification for lengthening seasons. This reflects the widely held belief among hunters that whenever wolves and ungulates occur together, wolves compete with humans and must be reduced and kept at low densities. In the absence of designated wolf control programs, de facto control achieved by excessively long seasons and liberal bag limits is typically endorsed by hunting interests. These beliefs are not supported by sound biological evidence obtained by research studies of wolves in Alaska and other areas of North America.

We concede that wolf predation on ungulates in certain areas at certain times may be excessive and may require management actions. But in this case we have seen no data indicating that wolf predation on ungulates in any Unit of southeast Alaska requires a wolf reduction program, or that de facto control by excessively long hunting seasons benefits ungulates or results in higher harvests of ungulates by hunters.

For these reasons, we strongly urge the Board to reject these proposals. Rather than lengthening wolf hunting seasons, we further recommend that the Board seriously consider shortening wolf hunting seasons in Units 1, 3, 4 and 5 as outlined in Proposal 46. This would return wolf management to a more sound wildlife management and conservation basis. It would recognize the considerable values that wolves have as big game and trophy animals. It would make hunters appear more humane by preventing harvests of very young or unborn pups. It would avoid wastage by prohibiting harvests at times when hides are not prime. And it would reflect recognition by the Board that de facto wolf control programs are often unnecessary and do not provide increased ungulate harvests for hunters.

PROPOSAL 2 -- 5 AAC 84.270. Furbearer trapping and 5 AAC 85.056. Hunting seasons and bag limits for wolf. Raise the management objectives for wolves in Unit 1A.

Defenders Position and Comment:

Oppose: See comment for Proposal #1.

PROPOSAL 5 -- 5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures and 92.052. Discretionary permit hunt conditions and procedures. Modify the black bear baiting permit conditions in Unit 2.

Defenders Position and Comment:

Oppose: Defenders does not support issuing bear baiting permits by mail or removing the requirement to provide GPS coordinates in person. Providing GPS coordinates for bait stations is essential for enforcement of the bear baiting regulations by state troopers, including complying with bait use restrictions, removal of the bait station, and avoiding private property. Providing GPS coordinates and obtaining permits in person is also essential to law enforcement to verify the person's identification and for possible prosecution of violations. Without personal verification of who is applying and designating bait stations locations, enforcement of violations would be impossible.

PROPOSAL 6 – 5 AAC 85.015. Hunting seasons and bag limits for black bear. Close the black bear fall hunting season in Unit 2.

Defenders Position and Comment:

Neutral: Defenders advocates the board recognize the high harvest rates by out of state sport and trophy hunting for black bears in the Southeast. The ADF&G has noted that the harvest rates have increased to the point that sustainable yield and the overall health of the black bear population is at risk. The Board of Game needs to address these facts and develop a comprehensive harvest goal that will protect black bear populations from overharvest by slowing or stopping the increased harvest levels, especially by out of state hunters. The Board of Game needs reliable and current bear population estimates for each GMU in Southeast Alaska before allowing the harvest levels of black bears to increase. In addition, the Board of Game needs to adopt harvest ticket reporting requirements for both successful and unsuccessful hunting effort in each GMU in Southeast Alaska to assist the ADF&G in managing black bear populations in these GMU's.

PROPOSAL 7 – 5 AAC 85.015. Hunting seasons and bag limits for black bear. Close the black bear fall hunting season in a portion of Unit 2.

Defenders Position and Comment:

Neutral: See comments for Proposal #6.

PROPOSAL 8 – 5 AAC 84.270(6). Furbearer trapping. For Kuiu Island in Unit 3, shorten the marten trapping season for residents, close the nonresident marten trapping season and create a Kuiu Island Management Area that is closed to the use of motorized land vehicles for trapping marten.

Defenders Position and Comment:

Support: The martin population is a risk due to expanding logging operations and increased human access due to road development. The associated influx of workers for these expanding industries and the current high price for marten pelts could easily result in higher harvest levels for martins on Kuiu Island, harvest levels that are unsustainable and that threaten the long term survival of the martin population, especially when no harvest limits are established. Closing non resident trapping seasons is one way to attempt to reduce harvest but we acknowledge, additional measures may be needed to address the needs for sustaining the martin population. The Board of Game needs to closely monitor the harvest numbers and the population estimates.

PROPOSAL 12 – 5 AAC 85.056. Hunting seasons and bag limits for wolf. Extend the hunting season for wolves in Unit 3.

Defenders Position and Comment:

Oppose: See comment for Proposal #1.

PROPOSAL 13 – 5 AAC 85.056. Hunting seasons and bag limits for wolf. Extend the hunting season for wolves in Unit 3.

Defenders Position and Comment:

Oppose: See comment for Proposal #1.

PROPOSAL 23 – 5 AAC 85.015. Hunting seasons and bag limits for black bear. Modify the regulation restricting the taking of white-phase black bear in Unit 1D.

Defenders Position and Comment:

Support: Light phase black bears are an important cultural and regional asset. Both citizens and the tourism industry have strong ties to this small population of black bears. Protecting them addresses the needs of other user groups and industries and does not limit the harvest to the general hunt due to the low number of light phase black bears.

PROPOSAL 24 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear and 92.132. Bag limit for brown bears. Modify the season and bag limit for brown bear in Units 1C and 4.

Defenders Position and Comment:

Oppose: Defender does not support changing the harvest date for brown bears to end on June 15th nor liberalizing the harvest to one bear every year from one bear every four years. Brown Bear hunting in this unit is managed as a trophy hunt. Increasing the brown bear harvest to every year would be detrimental to managing for maximum trophy status. The ADF&G nor the Board of Game has provided any data or issued any findings to indicate that the brown bear population in unit 1C is excessively high or causing big game species populations to be limited. There is no scientific justification for the claims this proposal makes. In addition, user group conflicts increase significantly in June when recreational uses and tourism use increases. We do not support changing the season end date to June 15 due to increased user group conflicts.

PROPOSAL 31 – 5 AAC 84.270. Furbearer trapping and 5 AAC 85.056. Hunting seasons and bag limits for wolf. Lengthen the hunting and trapping seasons for wolf in Unit 1D.

Defenders Position and Comment:

Oppose: See comment for Proposal #1.

PROPOSAL 34 – 5 AAC 84.270(14). Furbearer trapping. Shorten the wolverine trapping season in Units 1-5 to end on February 15.

Defenders Position and Comment:

Support: Due to the low reproductive rates for wolverine careful consideration of the species reproductive needs are paramount. Central to this consideration is the need to address critical habitat requirements and specific times of the year which are essential for female wolverines, especially when no bag limits are established. Pregnant females and those with pups are vulnerable after February 15.

Traditional harvest is very low from February 15 to April 30 indicating passing this proposal would have minimal effect on the trapping community.

PROPOSAL 36 – 5 AAC 85.015(1). Hunting seasons and bag limits for black bear. Amend this regulation in Units 1A, 1B, 1C, 2 and 3: to delay the start of the fall black bear hunting season to September 15 for nonresidents.

Defenders Position and Comment:

Support: At issue is the lack of reliable black bear population estimates coupled with a rapid increase in harvest of black bear in the last decade, especially by out of state sport and trophy hunters. Defenders strongly support any attempt to stop the increase in black bear harvests in Southeast Alaska. While this proposal is an attempt to address disproportional and increasing out of state hunting pressure, up to 70% of the harvest in some units, it is a very limited attempt. While we support this proposal Defenders strongly encourages the Board of Game to adopt additional measures, including closing the season on May 31, to not allow increased harvest levels of black bears. We also advocate for establishing harvest limits with season closures once they are met. It is imperative that the Board of Game manage the black bear population conservatively in the absence of current and accurate population estimates.

PROPOSAL 39 – 5 AAC 92.010. Harvest tickets and reports. Require harvest tickets for hunting black bear in Units 1-3.

Defenders Position and Comment:

Support: Defenders strongly supports any proposal that provides the ADF&G with additional tools to effectively manage the black bear harvest. We also advocate for establishing registered hunts with harvest limits and season closures once the harvest is met. It is imperative that the Board of Game manage the black bear population conservatively in the absence of current and accurate population estimates, especially when the harvest is increasing significantly each year.

PROPOSAL 41 – 5 AAC 92.052 Discretionary permit hunt conditions and procedures. Modify the current language to provide clarification regarding the intended authority of this section relative to issuing bear baiting permits in Unit 1-5.

Defenders Position and Comment:

Support: Defenders strongly supports any proposal that provides the ADF&G additional tools to effectively manage the black bear harvest. This proposal is essential for reducing user group conflicts between bait stations use and other user groups.

PROPOSAL 42 – 5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures, and 92.052. Discretionary permit hunt conditions and procedures. Modify the black bear baiting permit requirements for Units 1-5.

Defenders Position and Comment:

Oppose: Providing GPS coordinates for bait stations is essential for enforcement of the bear baiting regulations by state troopers, including complying with bait use restrictions, removal of the bait station,

and avoiding private property. Providing GPS coordinates and obtaining permits in person is also essential to law enforcement to verify the person's identification and for possible prosecution of violations. Without personal verification of who is applying and designating bait stations locations, enforcement of violations would be impossible.

PROPOSAL 45 – 5 AAC 85.056. Hunting seasons and bag limits for wolf. Extend the wolf hunting season dates for Units 1 and 2.

Defenders Position and Comment:

Oppose: See comment for Proposal #1.

PROPOSAL 46 – 5 AAC 85.056. Hunting seasons and bag limits for wolf. Modify the wolf hunting season dates for Units 1, 3, 4, and 5

Defenders Position and Comment:

Support.

PROPOSAL 49 – 5 AAC 92.085. Unlawful methods of taking big game; exceptions, and 92.260. Taking cub bears and female bears with cubs prohibited. Modify the methods for taking black bear in Unit 25D.

Defenders Position and Comment:

Oppose: Liberalizing the harvest of black bears in Unit 25D to include the use of snares and harvesting sows with cubs or the cubs themselves is not warranted. The Board of Game has not issued any findings that black bear populations are responsible for low big game populations. In the absence of biological data to support the suggestion that black bear populations are excessively high or the reason big game populations may be low, such drastic measures are not justified. In addition, snaring black bears is strongly opposed by the public and affords excessive bycatch, including moose which is counter productive to the goals of increasing the moose population.

PROPOSAL 50— 5 AAC 92.080. Unlawful methods of taking game; exceptions, and 92.125. Predator control areas implementation plans. Amend the regulations to allow wolf denning.

Defenders Position and Comment:

Oppose: Defenders does not support disturbing or destroying wolf dens as a traditional harvest method. Unit 19 has an aerial predator control program and a very liberal season and bag limit for wolf. There is no scientific justification to expand predator control to the use of "denning" wolfs. Current aggressive predator control programs are sufficient as noted by the Board of Game. In addition, there is no supporting data that "denning" has ever been a traditional harvest method.

PROPOSAL 51 — 5AAC 92.260. Taking cub bears and female bears with cubs prohibited, and 92.125. Predation control areas implementation plans Modify the methods for taking bears in Unit 19 intensive management areas.

Defenders Position and Comment:

Oppose: Killing of any bear, including female sows with new born cubs is strongly opposed by the public and is not warranted. No scientific data supports the need to expand predator control programs to targeting any bears, including Brown bears. This is an unwarranted and extreme proposal, especially in the absence of current scientific data confirming brown and black bears are responsible for low big game populations in any given GMU.

PROPOSAL 52 & 53 — 5 AAC 92.085. Unlawful methods of taking big game, exceptions, and 92.260. Taking cub bears and female bears with cubs prohibited. Allow the taking of black bear from dens in Units 21 and 24.

Defenders Position and Comment:

Oppose: Killing of any bear, including female sows with new born cubs is strongly opposed by the public and is not warranted. No scientific data supports the need for "denning" of bears in any of the Game Management Units in Alaska. There is no reliable data to confirm denning has ever been a traditional method of harvest. Use of artificial lights certainly could not be construed as a traditional hunting tool. Harvesting bears in this manner jeopardizes sustained yield and risks overharvest of a valuable resource. Spotlighting or using artificial light to search for prey has long been widely prohibited for reasons of hunter ethics, fair chase, avoiding excessive harvest, and law enforcement issues.

The practice of denning has been outlawed for many years. Destroying the young in a den is widely condemned as an unethical.

PROPOSAL 54 — 5 AAC. 92.125. Predation control areas implementation plans. Modify the predation control plan for Unit 20E.

Defenders Position and Comment:

Oppose: For reasons stated in other proposals, we oppose the taking of bear cubs and mothers with cubs, and we oppose the use of traps and snares to harvest bears. We have strong objections to same day airborne hunting of predators for numerous reasons, including fair chase issues, harassment potential, and concern that this is management that is not conservative for species (like grizzly bears) that are slow to reproduce.

Shooting female bears with cubs or the cubs themselves is strongly opposed by the public and is not warranted. Unit 20E already has an aggressive predator control program and liberalized bear harvest regulations that are sufficient.

Selling of bear hides commercializes the resource and does not increase bear harvest goals as noted in Unit 16's attempt to increase black bear harvest by allowing the selling of bear parts. Lack of effective enforcement regulations and low numbers of officers encourage poaching in other areas of the state for the purpose of selling bear parts for profit.

Furthermore, we believe that the Alaska Outdoor Council is neither broadly nor fairly representative of hunters or conservationists in Alaska; to specifically name this group and leave out others suggests the disproportionate influence that this group has on wildlife regulatory policy decision-makers in the State.

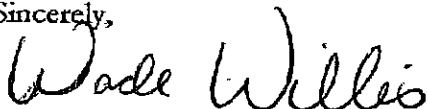
PROPOSAL 55 — 5 AAC 92.090. Unlawful methods of taking fur animals; 92.095. Unlawful methods of taking furbearers, exceptions; 92.080. Unlawful methods of taking game, exceptions; 92.085. Unlawful methods of taking big game, exceptions; and 98.XXX. Areas of jurisdiction for taking predators in intensive management areas. Amend the regulations for methods, seasons, and bag limits for taking predators in intensive management areas.

Defenders Position and Comment:

Oppose: Defenders does not support giving regional advisory councils regulatory authorization status. We do not feel this is appropriate nor the intention of the legislature for the establishment of advisory councils. No scientific data supports the need for "denning" of wolves in any of the Game Management Units in Alaska. There is no reliable data to confirm denning has ever been a traditional method of harvest. Without any supporting data or historical record this proposal is not warranted.

Thank you for giving our comments your thoughtful consideration.

Sincerely,



Wade Willis
Alaska Representative

I am writing to urge the Board of Game to adopt a more balanced approach to wildlife management in Alaska.

I oppose Proposals 1, 2, 12, 13, 31, 45 and 50. Specifically, I ask that you oppose:

* Expanding wolf hunting to allow the shooting or trapping of wolves during the months of May, June or August when young pups are in the den or when pelts are of little worth to the trapper.

* Expanding wolf hunting as a tool to increase deer, moose or mountain goat populations without strong scientific data indicating that wolves are a leading cause for low populations of big game species. Never cry wolf unless you can prove it!

* Allowing wolf dens to be disturbed or destroyed under the premise that it is a traditional harvest method. Unit 19 has an aerial predator control program and a very liberal season and bag limit for wolves. There is no scientific justification to expand predator control to the use of "denning" wolves.

If, as often noted by the Board of Game, current aggressive predator control programs are effective and sufficient, expansion of any kind is unnecessary. In addition, there is no supporting data that "denning" has ever been a traditional harvest method.

I oppose 49, 51, 52, 53, 54 and 55.

Specifically, I urge you to oppose:

* Allowing both black and brown bear cubs and/or female sows with cubs to be shot or snared.

* Allowing bears to be harvested in a den ("denning").

* Allowing bear hides, skulls, or claws to be sold for profit.

* Permitting the same-day aerial shooting of bears.

These measures are all extreme and unnecessary.

Shooting female bears with cubs or the cubs themselves is strongly opposed by the public and is not warranted. Unit 20E already has an aggressive predator control program and sufficiently liberalized bear harvest regulations.

Selling of bear hides commercializes the resource and does not increase bear harvest goals as noted in Unit 16's attempt to increase black bear harvest by allowing the sale of bear parts. And the lack of effective enforcement regulations and insufficient number of enforcement officers will only encourage poaching in other areas of the state.

Snaring of bears is strongly opposed by the public, is inhumane, and allows for excessive lethal snaring of dogs and non-targeted big game animals such as moose, caribou, or sheep.

Likewise, killing any bear in its den, including female sows with newborn cubs, is strongly opposed by the public and is not warranted. No scientific data supports the need for "denning" of bears in any of the Game Management Units in Alaska and there is no reliable data to confirm denning has ever been a traditional method of harvest. Furthermore, the proposed use of artificial lights certainly could not be construed as a traditional hunting tool.

In conclusion, I strongly believe that predator management decisions should be scientifically based and supported by our nationally-recognized scientific organizations that have repeatedly called on the Board of Game to do a better job when developing Alaska's predator control programs.

COMMENT#

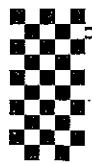
43

Last Name	First Name	Address	City	State
1. Waffan	Edward	PO Box 874256	Wasilla	AK
2. Greenwalt	Arthur	1620 Washington Dr Apt 79	Fairbanks	AK
3. Cooke	Jill	15711 Southpark Loop	Anchorage	AK
4. Salway	Malcolm	4701 Pavalof St	Anchorage	AK
5. Wells	Penelope	PO Box 240454	Anchorage	AK
6. LaPerriere	Zach	2212 Sawmill Creek Rd	Sitka	AK
7. Smith	Kim	PO Box 3235	Homer	AK
8. Minn	Beverly	500 Lincoln St Unit B9	Sitka	AK
9. mcpeck	hugh	8900 Basher Dr	Anchorage	AK
10. Baltensperger	Andy	PO Box 2139	Soldotna	AK
11. Gutman	Mark	PO Box 1082	Talkeetna	AK
12. Berge	Anna	PO Box 750119	Fairbanks	AK
13. Stout	Sandra	2943 Simpson Ave	Juneau	AK
14. Arend	Skylar	16300 Sandpiper Dr	Anchorage	AK
15. Bashleben	Rob	8378 N Wasilla Fishhook Rd	Wasilla	AK
16. Bassett	Linda	2940 Mallard Ln	Anchorage	AK
17. Bean	River	1305 N Smith Rd	Palmer	AK
18. Bell	Donna	2350 Old Lawson Creek Rd	Douglas	AK
19. Best	Heather	PO Box 80661	Fairbanks	AK
20. Betts	Christine	3090 N Bald Eagle Dr	Wasilla	AK
21. Biesiot	Gerard	PO Box 82291	Fairbanks	AK
22. Bissland	Stephanie	4034 Reka Dr Apt 2	Anchorage	AK
23. Blakemore	Bud	3202 Latouche St Apt A04	Anchorage	AK
24. Boisvert	Jennifer	5115 E 98th Ave	Anchorage	AK
25. Bowman	Alix	1121 China Berry Cir	Anchorage	AK
26. Boyd	Zoanne	1207 Molly Rd	Fairbanks	AK
27. Bragg	Dawn	PO Box 838	Sterling	AK
28. Brown	Tina	19400 Beardsley Way	Juneau	AK
29. Busch	Rebecca	PO Box 240482	Douglas	AK
30. Bush	Jessica	1302 Garden St	Anchorage	AK
31. Butler	Linda	9060 King David Dr	Anchorage	AK
32. Haywood	Britteny	9093 Fireweed Ln	Juneau	AK
33. Davis	Cynthia	HC 30 Box 5291C	Wasilla	AK
34. Davis	Dennis	65355 Corabin Rd	Anchor Point	AK
35. Dean	Jeff	40374 Waterman Rd	Homer	AK
36. Decker	Stephanie	4620 Southpark Bluff Dr	Anchorage	AK
37. East	Kathy	1610 Silver Pines Rd	Kenai	AK
38. Elbrader	Tory	PO Box 520163	Big Lake	AK
39. Farrell	Dorrie	3501 Halibut Point Rd	Sitka	AK
40. Ferre'	Corinne	1962 Three Sisters Way	Kodiak	AK
41. Fikstad	Cheradan	649 Jennie Ln Apt E4	Fairbanks	AK
42. Giloley	Dorothy	1316 Peger Rd	Fairbanks	AK
43. Hanneman	Jeanette	3325 N Bald Eagle Dr	Wasilla	AK
44. Hardeiland	Myra	14671 E Outer Springer Loop Rd	Palmer	AK
45. Harrison	Carolyn	PO Box 877178	Wasilla	AK
46. Herd	Vicki	2443 Schutzen St	North Pole	AK
47. Herman	Laura	1845 Parkside Dr	Anchorage	AK
48. Holzweiler	Deirdre	PO Box 22012	Juneau	AK
49. Horace	Vanessa	PO Box 71492	Fairbanks	AK
50. Jacob	Jill	PO Box 1721	Ward Cove	AK

COMMENT#

43

51. Johnson	Brenda	5875 Glacier Hwy Spc 26	Juneau	AK
52. Johnson	Susan	5010 N Douglas Hwy Lot 5	Juneau	AK
53. Kaden	Hayden & Bonnie	PO Box 138	Gustavus	AK
54. Kantor	Linda	7090 Fairweather Park Loop	Anchorage	AK
55. Kaufman	Kathleen	3449 Grissom Cir	Anchorage	AK
56. Klaich	James	320 Wedgewood Dr Apt G10	Fairbanks	AK
57. Knol	Steven	PO Box 752	Anchor Point	AK
58. Lillard	Ashley	4231 Laurel St	Anchorage	AK
59. Lopez	Jo	7666 Griffith St	Anchorage	AK
60. Lyons	Max	8007 Magnolia Ct	Juneau	AK
61. Martin	James	6700 Macbeth Dr	Anchorage	AK
62. McConkey	Kimberly	2610 E 42nd Ave Apt 1	Anchorage	AK
63. McDonald	Victoria	6526 Rogers Pass Rd	Ketchikan	AK
64. McNamara	Linda	2024A Jack St	Fairbanks	AK
65. Miller	John	944 W 11th Ave Apt B	Anchorage	AK
66. Mjos	Brita	1725 E 24th Ave	Anchorage	AK
67. Moe	Wendy	1308 W 31st Ave	Anchorage	AK
68. Mooney	Shannon	1336 W 23rd Ave Apt 212	Anchorage	AK
69. Moonwhisper	Olga	PO Box 90373	Anchorage	AK
70. Morgan	Amy	326 4th St Apt 1004	Juneau	AK
71. Morse	Andrew	PO Box 201	Cordova	AK
72. Mortensen	Shannon	12401 Lake St Apt 4	Eagle River	AK
73. Natekar	Ankit	PO Box 60811 Dubai, U.a.e	Dubai	AK
74. Nelson	Pamela	PO Box 240518	Douglas	AK
75. Neumann	Elizabeth	42410 Old Sterling Hwy	Anchor Point	AK
76. Newman	Connie A.	PO Box 56	Pelican	AK
77. Oliver	Paulette	1255 N Williwaw Way	Wasilla	AK
78. Humble	Luz	8201 Sky Mountain Cir	Anchorage	AK
79. Pinsley	Sharon	9029 Rosedale St	Juneau	AK
80. Polk	Jeffrey	PO Box 298213	Wasilla	AK
81. Quante	Donna	PO Box 1085	Willow	AK
82. Rafferty	Teresa	PO Box 1555	Soldotna	AK
83. Ray	Gretchen	116 3rd Ave	Fairbanks	AK
84. Ringer	Ramona	2702 Roger St	Juneau	AK
85. Schroeder	Todd	3260 W Grand Bay Dr	Wasilla	AK
86. Simon	Alex	9873 Lone Wolf Dr	Juneau	AK
87. Simon	Cindy	9873 Lone Wolf Dr	Juneau	AK
88. Sims	Liza	4100 Lake Otis Pkwy	Anchorage	AK
89. Smallwood	Debra		2018 Fairbanks	AK
90. Smith	Veronica	4001 Woronzof Dr	Anchorage	AK
91. Suhich	Sarah	3748 Glacier Hwy	Juneau	AK
92. Thumma	Katherine	PO Box 81026	Venetie	AK
93. Toon	Martha	6734A Marguerite St	Juneau	AK
94. Pearson	Amber	2810 W Northern Lights Blvd Apt 13	Anchorage	AK
95. Vest	Paul	3248 Latouche St Apt J7	Anchorage	AK
96. Vincent	Laurel	PO Box 260	Talkeetna	AK
97. Voinea	Raluca	1 Calea Doftanei Street	Bucharest	AK
98. Voves	Deborah	13231 Mountain Pl	Anchorage	AK
99. Wallin	Milton	19515 Highland Ridge Dr	Eagle River	AK
100. Walters	Lene	5950 N Bunny Dr	Wasilla	AK
101. Wendt	Kathleen	PO Box 766	Ward Cove	AK
102. Whitfield	Sath	7150 Montagne Cir	Anchorage	AK



103. Worthington	Nora	PO Box 670778	Chugiak	AK
104. Zanetti	Marcia	Rua 21, Quadra 31, Lote 28	Niteroi	AK
105. Zink	Janet	2962 Midnight Sun Ct	Anchorage	AK
106. bell	Sherry	HC 60 Box 2851	Haines	AK
107. billups	angela	2900 E Broadview Ave	Wasilla	AK
108. castro	sybille	PO Box 1849	Kenai	AK
109. cole	debi	16528 Kings Way Dr	Anchorage	AK
110. thompson	stephanie	4544 Reka Dr	Anchorage	AK
111. Coffey	Jennifer	1516 Kinnikinnick St	Anchorage	AK
112. Reese	Judith	PO Box 1171	Sterling	AK
113. King	Monica	2690 Julie Ln	North Pole	AK
114. Cuadra	Dorothy	PO Box 33678	Juneau	AK
115. Moeller	Faith	PO Box 3695	Palmer	AK
116. Murphy	Cheri	PO Box 6974	Ketchikan	AK
117. evans	christine	15965 Woodpecker Rd	Talkeetna	AK
118. Day	Kathy	21349 Baron Dr	Chugiak	AK
119. Schaaf	Jeanne	6961 Rabbit Creek Rd	Anchorage	AK
120. Friedrick	Katherine	872 Cardigan Cir	Anchorage	AK
121. Woyke	Kirsten	9095 E Gold Pan Dr	Palmer	AK
122. Printz	Katherine	9205 E Gordy Dr	Palmer	AK

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OCT 23 2008

Robert Jahnke, Ward Cove Alaska

November 2008

BOARD

I would like to start my Board comments with a quote from Governor Palin's speech given at the 41st annual meeting of the Alaska Federation of Natives, Oct. 25, 2007.

[In combination with active predator control programs, we are working hard to increase game populations so that Alaskans can have the greatest opportunity to hunt and harvest to feed their families. We will manage fish and game resources for abundance.]

With that official mandate being said I would like to proceed with my personal comments on some of this falls game proposals.

PROPOSAL #1 Robert Jahnke, This is my proposal, please pass.

Trapping is a management tool that on occasion needs to be honed, especially in times of increased wolf predation in areas such as Unit 1A where predator control is difficult. This is only a 10 day add on that we had some years ago. The proposal should speak for itself.

PROPOSAL #2 Robert Jahnke, This is my proposal, please pass.

The management objectives for wolves in Unit 1A by the Dept. are too low and have been for many years. Raising these objectives to at least 25 a year would indicate to many concerned residents in Unit 1A that the Dept. is willing to move in a positive manner to address the wolf predation problem in Unit 1A. This proposal would strengthen the foundation on which dealing with the on going wolf problem in Unit 1A can be dealt with. It is time to deal with our wolf problems in Unit 1A. I'm sorry to say our local office has ignored the obvious too long. The Dept.'s own data tells the tale. If we are going to turn this wolf predation problem around we need to do it now. The bottom line is we need a mission change in our local ADF&G office.

We need aggressive wolf control measures in Unit 1A. We all (Dept. included) need to educate hunters that it is not a bad thing to kill a wolf. Especially at times of high wolf predation.

We need to extend seasons and bag limits for the taking of wolves at these times.

The abundance has been and is documented in Unit 1A. The time to act is now.

Many of us are willing to sit down with a reasonable member of ADF&G to pound out solutions for this problem.

Many of us consider that we are part of Governor Palin's mandate and are willing to help if we can find common ground to work on with the Dept.

Do not alienate trappers and hunters with frivolous proposals. At times we are the Dept.'s only available management tool. When utilized properly we are an important asset to the State of Alaska.

PROPOSAL #3 ADF&G proposal, please oppose.

Deer have been decimated on the Cleveland Peninsula. This is the direct result of wolf predation for at least the last 10 to 15 years. Subdividing Unit 1A's bag limits by area for deer is not the answer. Since Jan.'08, 18 wolves that I know of were harvested from the lower West Behm Canal area and north Gravina Island, the Cleveland makes up the north half of West Behm. In the season of '03/'04, 19 wolves were taken in this relatively small triangle, 14 of which came from the Cleveland. These were the only wolves that I am aware of. My point here is people are out there taking care of the problem. I'm glad to say we have young folks willing to deal with the issue, folks that harvest wildlife to feed "THEIR" families, these fellows are footing the bill that eventually everyone will benefit from. I believe the Cleveland will recover, but it will take time, dividing hunters in Unit 1A on this issue is not the answer to the problem.

PROPOSAL #4 Brian Warmuth, please pass. Unit 1A bag limit on goats, change from 1 to 2
With low harvest numbers in Unit 1A extensive harvest is not an issue.

PROPOSAL #33 and #35 Rick Newlun and Robert Jahnke, please pass.

I oppose trap tags in Units 1-5. No where else in the State of Alaska, that I am aware of, has this restriction. ATA informed me that the Fairbanks area tried trap tags for a while and then dropped the restriction. I have trapped every year in Unit 1A for 37 years. I have had traps literally destroyed by wolves, otters, wolverines, etc. Pans and triggers never to be seen again. What happens when a wolf has done this with a trap tag and "Protection" comes upon the scene? There will be little doubt the wolf was mine after 31 years on the same line. Also I have learned that trap signs invite thieves when it comes to beach trapping, so my trap line signs are usually a considerable distance from my sets. Another question. This year I had a marten trap stolen with my ID number attached. If it shows up in an unfavorable place, what do I do? I would like a rock solid answer to this one.

Also, if a man's time is worth anything, the monetary cost of time and tags can sure be a burden, especially with two or three hundred traps to deal with, and to deal with every year. This burden of cost was a question not dealt with at the Nov. '06 meeting.

PROPOSAL #34 ADF&G proposal, please oppose. Shorten wolverine season Units 1-5

I was around when the season was lengthened to coincide with the wolf season. This was a good thing.

When reading [other solutions considered] I felt very intimidated.

It seems odd to me that a recent (less than a year old) genetic research in Unit 1B could be responsible for eliminating 2 ½ months of the wolverine season in all of Units 1-5 when the harvest data shows little activity in the latter part of the season. Those few wolverine the wolf trapper collects, he should be able to keep.

PROPOSAL #38 ADF&G proposal, please oppose. SEE PROPOSAL #39

Black bear harvest tickets are an unwarranted burden on resident black bear hunters.

PROPOSAL #39 Alaska Professional Hunters Association, please pass.

Please pass as an alternative to Proposal #38.

Nonresidents would probably be more agreeable and less burdened.

PROPOSAL #43 Gary Miller Barter Deer Meat ABSOLUTELY NOT

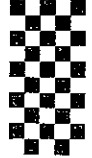
PROPOSAL #45 Brian Warmuth, please pass. Hunting seasons for wolves in Units 1&2

PROPOSAL #46 Defenders of Wildlife etc., please oppose.

Shorten the wolf hunting season in Units 1,3,4,5

In 2004 when the seasons were lengthened it was after only two years of shorter seasons. August 1st - April 30th is quite proper. The Dept's data proved this in 2004. Many of us in 1A would like to see Proposal #45 pass.

PROPOSAL #47 Kyle Ferguson, please oppose. Extend waterfowl season to mid-January.



October 24, 2008


To: Alaska Board of Game
PO Box 115526
Juneau, Alaska 99811-5526
C/O Kristy Tibbles

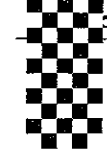
From: Bob Carlson
PO Box 98
Skagway, Alaska 99840

Re: Spirit Bear Protection in the area of Skagway

I too would like the board to consider protection of spirit bears in the Skagway area, Unit 1D. The community has asked in the past for your help writing protection regulations for these bears in our area. I would hope you take us seriously this time and give thought to your actions. Consider language similar to that used by John Warder that is: **"A light-phase black bear that has cream coloration (or lighter) over more than 30% of its body may not be taken irregardless of any other coloration."**

I had the brief opportunity to listen in at the public meeting given in Skagway late summer. While I appreciate your attendance the effort given our request seemed lacking. You changed the wording we used in our initial suggestion to the Board such that it became unenforceable and unrecognizable. The real sticker was that you made this change with out consulting our community. Please this time take our request seriously. Thanks in advance for all your consideration.

Bob Carlson 



I am writing to urge the Board of Game to adopt a more scientific approach to wildlife management in southeastern Alaska.

I oppose Proposals 1, 2, 12, 13, 31, 45 and 50. Specifically, I ask that you oppose:

- * Expanding wolf hunting to allow the shooting or trapping of wolves during the months of May, June or August when young pups are in the den or when pelts are of little worth to the trapper. It is a waste of the resource.
- * Expanding wolf hunting as a tool to increase deer, moose or mountain goat populations without strong scientific data (no data!) indicating that wolves are a leading cause for low populations of big game species.
- * Allowing wolf dens to be disturbed or destroyed under the premise that it is a traditional harvest method. Unit 19 has an aerial predator control program and a very liberal season and bag limit for wolves. There is no scientific justification to expand predator control to the use of "denning" wolves.

If, as often noted by the Board of Game, current aggressive predator control programs are effective and sufficient, expansion of any kind is unnecessary. In addition, there is no supporting data that "denning" has ever been considered a traditional harvest method.

I oppose 49, 51, 52, 53, 54 and 55.

Specifically, I urge you to oppose:

- * Allowing both black and brown bear cubs and/or female sows with cubs to be shot or snared.
- * Allowing bears to be harvested in a den ("denning").
- * Permitting the same-day aerial shooting of bears.

My justifications for the oppositions to the above proposals are: Shooting female bears with cubs or the cubs themselves is strongly opposed by the public and is not warranted. Unit 20E already has an aggressive predator control program and sufficiently liberalized bear harvest regulations.

The killing of any bear in its den, including female sows with newborn cubs, is strongly opposed by the public and is not warranted. No scientific data supports the need for "denning" of bears in any of the Game Management Units in Alaska and there is no reliable data to confirm denning has ever been a traditional method of harvest. Furthermore, the proposed use of artificial lights is certainly not considered a traditional hunting tool.

In conclusion, I strongly believe that predator management decisions should be scientifically based and supported by our nationally-recognized scientific organizations, and Alaska's federal partner agencies (The U.S. National Park Service, The U.S. Forest Service, and the US Fish and Wildlife Service) that have repeatedly called on the Board of Game to do a professional job when developing Alaska's predator control programs.

Sincerely,

E. Jozwiak
P.O. Box 968
Soldotna, AK 99669

dated October 23, 2008

COMMENT# 46

RECEIVED TIME OCT. 24. 7:46AM

10780 Mendenhall Loop Rd.
Juneau, AK 99801
October 24, 2008

VIA Fax to: 465-6094

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

RECEIVED
OCT 24 2008
BOG

Dear Board of Game Members:

As a resident of Juneau, AK for over 17 years, I am a retired veterinarian whose spouse holds both hunting and fishing licenses. Please carefully consider my comments on the following proposals:

- 1. OPPOSED: PROPOSAL 21 – 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.** I am totally opposed to allowing trapping within 50 yards of trails in Unit 1C. Not only will this provision risk injury to dogs, but children and adult hikers (myself included) frequently wander off trails to enjoy, for example, skiing, following animal tracks, and bird-watching and would be put at needless risk. I am unclear as to what motivates the individual who made this proposal to be so punitive of “irresponsible dog owners” that he believes injuring their pets in traps will somehow make people more “responsible.” I am an active member of the Gastineau Humane Society’s Board of Directors, and I know many thoughtful dog owners in Juneau who work hard to educate other pet owners. Threatening to injure, maim, and kill pets is not a constructive method to encourage more responsible behavior. This is a punitive, mean-spirited proposal that is in conflict with the multi-use purpose of our recreational trail system.
- 2. SUPPORT: PROPOSAL 22 – 5 AAC 92.550. Areas closed to trapping.** The Juneau Area State Parks Advisory Board (of which I am a former 7 yr. member) has summarized the issue of dogs being injured and killed in traps on local trails very well in the Proposal Book. Please support this common-sense and *humane* proposal to ensure the safety of our local trails.
- 3. SUPPORT: PROPOSAL 23 – 5 AAC 85.015. Hunting seasons and bag limits for black bear.** My husband and I spent considerable time and money several years ago to have the opportunity to view a Kermode bear on an island off the coast of British Columbia. We felt very fortunate to have succeeded in seeing this rare colored black bear. I strongly support efforts to protect all bear with unusual coloration so others can benefit from seeing these unique animals and to protect the genetic pool that produces these rare colorations. Please support this proposal to ensure that cream-colored black bears would be protected from hunting under enforceable regulations in Unit 1D, Haines, Klukwan, Skagway areas.

COMMENT# 47

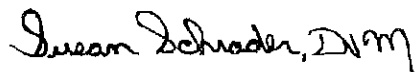
RECEIVED TIME OCT. 24. 3:27PM

4. OPPOSE: PROPOSAL 24 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear and 92.132. Bag limit for brown bears. This proposal that would extend the spring brown bear hunting season by 2 weeks in Unit 1C, the mainland from Cape Fanshaw north to just south of the Katzahin River, runs counter to principles of brown bear conservation that are well-known to the Board of Game. My husband and I frequently view brown bears in the spring in the areas covered by this proposal. As you all know well, this time of year the bears are in the intertidal areas and along the coasts with their young and are easily hunted. To further extend the season on these vulnerable animals seems contrary to fair chase ethics. Please do not do so.

5. SUPPORT: PROPOSAL 46 – 5 AAC 85.056. Hunting seasons and bag limits for wolf. This rational proposal is well-outlined in the Proposal Book, and I encourage to the Board to carefully consider the merits of it. Shortening the season by 2 months is a humane approach that additionally helps ensure the pelts of those wolves that are taken are of high quality. Please support this proposal.

I am not opposed to hunting. I am opposed to inhumane treatment of animals. The Board of Game has the power, authority, and responsibility to ensure Alaska's wild animals are treated respectfully and humanely, whether they are hunted or simply watched. Please support those proposals that regulate hunting in a more humane manner.

Sincerely,



Susan E. Schrader, D.V.M.

Randy Tahute pg. 2

10-24-08

Wolverine Proposal 34

I am against the closing of wolverine trapping season on Feb 15 in unit 1A.

Wolf season is open till April 30 as it should be, and wolverines can be caught in wolf sets. Few wolverines are harvested in unit 1A, and most are males. Don't see where this is harming the population.

Thank you
Randy Tahute

907-247-2421

COMMENT# 48

From Randy Jahntke pg. 1

10-24-08

Black Bear Program (36)

Knocking off the first two weeks of bear season in weeks 1 & 2 in sept. would severely hurt my business as most black bears are harvested in the month of sept. Also the state would lose a considerable amount of license revenues. It would also hurt the guides, who depend on the first two weeks of sept. to harvest black bears as they also target brown bears after the 15th.

RECEIVED
OCT 24 2008
WISCONSIN
DNR

Deer proposal (3) SAAC 85.030

I am against the proposal to change the deer harvest on Cleveland peninsula to two class.

The reason is, you would have to use tags 1 or 2 and if I want somewhere else first to shoot a deer and use tag 1, I would only be allowed to harvest 1 deer on Cleveland. I believe the deer are rebounding. The deer herd dropped from their peak in the 80s and early 90s mainly because of wolves, but it's rebounded before, and nature will take its course.

suggestion - open harvest of wolves year round. Thank you
Randy Jahntke
907-247-2424

COMMENT# 48

RECEIVED

October 24, 2008

To the Board of Game:

Below are my comments on the some of the proposals before you. Please enter them in to the record.

Proposal 15: I oppose the extension of beaver trapping by 3 weeks in Unit 1C, which includes Juneau, Douglas Island, and areas north and south along the mainland coast. It is not warranted as there are no bag limits on beaver during the current season and an extended season could be detrimental to the population.

Proposal 16: I oppose extending the beaver hunting/trapping season by 4.5 months, Sept.1- June 30, in Unit 1D, targeted area is the Chilkat Valley. This extension is extreme, particularly because there are no bag limits for killing beaver. This proposal is likely to be detrimental to the population.

Proposal 17: I oppose this proposal. Bounties are historically difficult to regulate and when instituted have had dire consequences in eliminating and/or seriously decreasing various species populations. Another reason to oppose this proposal is related to cost; who will pay for these bounties?

Proposal 23: I support this proposal. These bears are a valuable wildlife resource to protect as they provide appreciation/enjoyment for All user groups..

Proposal 24: I oppose. Bears are vulnerable to hunters in the spring as they frequent intertidal/coastal areas where they can easily be seen and shot. This is not congruent with brown bear conservation.

Proposal 31: I oppose extending the wolf hunting/trapping season in Unit 1D, Haines, Klukwan, Skagway area, by 2 weeks until May 15, because of the belief that the current wolf population could be detrimental to and could decimate the moose herd is anecdotal. There must be scientifically based data to support such a proposal. In addition, extending the season into May will cause more wolf pup mortality as a result of killing adult wolves that pups rely upon for their survival.

Proposal 45: I oppose this proposal to extend the wolf hunting season by 1 month, to May 31- the season currently runs from Aug.1- April 30, in Units 1 and 2, i.e. Juneau, Douglas Island, the mainland north and south of Juneau, Haines, Klukwan, Skagway, and Prince of Wales Island. It is unwarranted and would be inhumane to pups born in the spring as they are reliant on adults for their survival.

Proposal 46: I support this proposal to decrease the wolf hunting season by 2 months in Units 1, 3, 4, and 5- essentially all of SE AK except for Prince of Wales Island.

Thank you for your good work on the Board.

Sincerely,

Jai Crapella

PO Box 240

Gustavus, AK 99826

RECEIVED TIME OCT. 24. 4:04PM

COMMENT#

49

RECEIVED

OCT 24 2008

BOARDS

To Whom It May Concern:

I am commenting on the hunting of black bear in Unit 2 and proposals 6, 7, and 36.

I live on Prince of Wales Island and have since 1994. I am a Sealer for the State Of Alaska for black bear and furbearers. I am greatly concerned by the decline of black bear numbers and age class of the bears on the Island. I know that habitat changes, aging second growth, and bears sensitivity to hunting has changed the bear's habits with increased hunting pressure. I know that when changes were put in place on Kuiu that hunting Pressure on Prince of Wales greatly increased. The bottom line is there are way fewer bear of a very much younger age class. You might argue that the harvest records for the past few years indicate a decline in harvest thus beginning a trend. That is not true, the decline was driven by prolonged colder springs and access challenges due to snow and economic challenges with the high cost of fuel, air travel, and the lack of excess money. Believe that something needs to be done now before we slip farther over the hump croding our bear populations, age class, and sex ratios.

I support proposal 36 with the following changes:

1. Require a harvest report card. What ADF&G does not know is harvest effort. As a sealer and owner of a local business I hear how there are way fewer bears and only smaller bear. I hear the stories...I get the complaints and hear frustrations.
2. Amend this regulation in Units 1A, 1B, 1C, 2 and 3: to delay the start of the fall black bear hunting season to September 15 for nonresidents. This is when the highest percentage of females are harvested. Closing the first 1/2 of September is very important..if you do nothing else please consider this closure.
3. Place a harvest cap on the bear harvested in Unit 2 as you have for Unit 3 on Kuiu. ADF&G's harvest data show that many roaded WAA's are being over harvested. I suggest a cap of no more than 350 bears harvested anually. Though harder to regulate, a cap could include a cut off when a certain number of femael were taken.
4. Make it mandatory that the meat of all black bear shot in June be salvaged. There is no reason to not salvage the meal of a bear in June....they are not eating fish. This is the ethical thing to do.

I am sure that some guides will scream about such regulation changes. However if we do not make some bold changes here it will eventually result in the closure of bear hunting because of the reduced numbers, age class, etc. I have lodge owners and many residents in Thorne Bay who support the proposals I have made above. I know that the changes I have proposed will affect my business but it is the right thing for the black bear population and future hunting and bear viewing opportunities.

COMMENT# 50

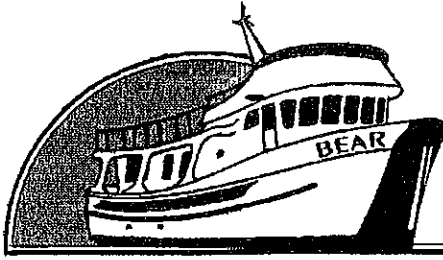
Thank you for the opportunity to comment.

Jim Baichtal
P.O.Box 19515
Thorne Bay, Alaska 99919
907-828-3339
baichtal@aptalaska.net

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COMMENT# 50



Alaska Coastal Outfitters

October 24, 2008

Alaska Department of Fish & Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99835

Re: Comments BOG Fall 2008 Meeting

Thank you for the opportunity to comment on the proposals for your fall 2008 meeting. I am a licensed master guide from Sitka and several of these proposals have a significant impact on my guiding business.

Proposal 36: Black Bear Season

Proposal 36 is the most important proposal to me as a hunting guide and I am strongly opposed to it. Along with many other guides, I have been working for years to preserve the high quality black bear hunting experience that Southeast Alaska is well known for. Proposal 36 will effectively take away 100% of our fall guiding opportunity for black bears, something that we've gone to great effort and expense to maintain.

Concern with non-resident hunting pressure in Southeast Alaska is nothing new. Since the late 90's, guides have been actively working with ADF&G, the Department of Public Safety, the Forest Service, and the Big Game Commercial Services Board to get better control of the black bear situation in Southeast Alaska. At times it has been frustrating at how slowly the wheels of government have turned and I believe that we continue to have too much non-resident hunting pressure in parts of Southeast Alaska but I'd like to point out some of the positive changes that have occurred in the past few years. Although I strongly believe that ADF&G needs to develop an effective black bear management strategy for this part of the state, I do not believe we are in some kind of crisis mode that justifies taking away our fall guiding opportunities.

In GMU3 where I operate, the majority of non-resident black bear hunters have traditionally hired guides. Access in this GMU is more difficult, requiring boats, local knowledge of weather and tides, and other skills that make a self-guided hunt difficult. In the past few years we have also seen the beginning of so-called "transporting" for black bears in Southeast Alaska, including GMU3. Increasing black bear hunting pressure from non-residents hiring either guides or transporters has been a concern among GMU3 guides for at least the past 10 years. In response to this problem the U.S. Forest Service imposed a freeze on black bear allocations to guides on Kuiu Island in 2000 and the BOG imposed a harvest cap on Kuiu at the same time.

About this same time guides began working with enforcement agencies to curb a developing problem with illegal guiding in Southeast Alaska for black bear hunters. We have had a

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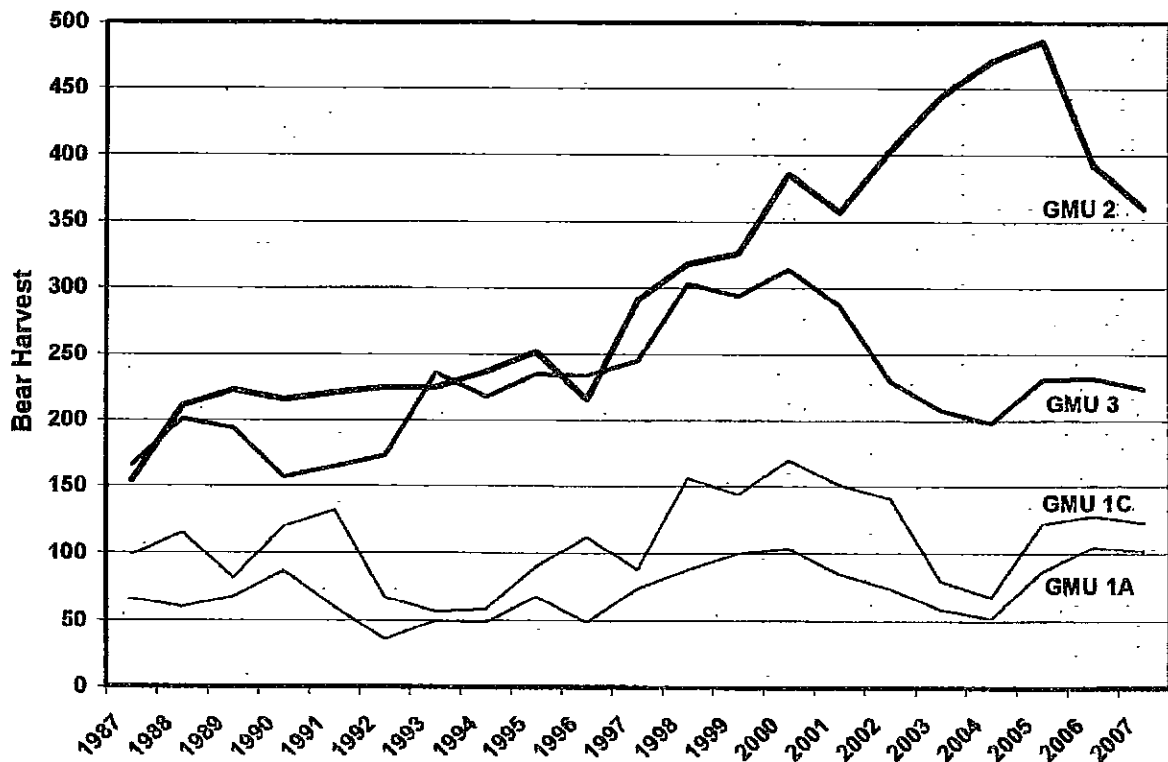
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COMMENT# 51

number of very significant "busts" in both GMU2 and GMU3 since then that have helped reduce the illegal component of the black bear harvest.

Below is a graph of the black bear harvest in Southeast for the past 20 years for GMU's 1A, 1C, 2 and 3. In GMU3 there has been a considerable decline in the black bear harvest since 2001/2002 which can be attributed at least to some extent to the limitations placed on guides, the ADF&G harvest cap, and enforcement actions.

GMU 1A, 1C, 2 & 3 Black Bear Harvest



This is not to say that we do not continue to have a problem with over-hunting of black bears in GMU3. For one, I believe we have too much non-resident hunting pressure for black bears in the unit. We definitely do not see as many trophy bears as we used to and the success rate of our black bear hunters is way down from past years. The point I am trying to make, though, is that we are not riding a run-away freight train that requires drastic action like taking away our fall black bear guiding season. Our efforts over the past several years have resulted in enough stability in the situation that ADF&G should be able to proceed with development of an effective management plan without worrying that we will have a biological disaster before they are done.

Before discussing the situation in GMU2 I want to comment that it's important to look at these GMU's individually, not as a whole. Proposal 36 lumps all these GMUs together when it notes harvest numbers of 978 bears. These populations of bears are geographically isolated from each other. Not many black bears from Kuiu Island are going to swim across Sumner Strait to Prince of Wales or vice versa just because of changes in hunting pressure.

The black bear situation in GMU2, aka Prince of Wales Island, is somewhat different than in GMU3. Prince of Wales has an extensive road system making access much easier. Non-resident hunters have a much easier time hunting on their own here. The data shows that the majority of non-residents that hunt black bears in GMU2 do not hire either a guide or a transporter. For that reason it is not as effective to control hunting pressure on POW just by controlling guides and transporters.

However, guiding and transporting pressure IS still a significant factor on POW and the gains already mentioned for GMU3 also apply to GMU2. Allocation caps have been imposed on guides by the Forest Service and enforcement busts on POW have had a big impact. Enforcement presence remains high on the island and there continues to be enforcement actions taken there.

ADF&G has also begun to better control black bear baiting on POW. Baiting has become a significant factor effecting black bear harvest on the island. Keeping a handle on the black bear baiters ought to reduce the kill and wounding loss associated with do-it-yourself bow hunters on POW.

Even though the black bear kill on POW is high, the data shows a significant reduction in harvest since 2005. Enforcement actions and toughening up the baiting requirement are in part responsible for this. As was the case for GMU3, there is a definite need for a sound management strategy for GMU2 black bears. The hunting pressure is too high and the bear kill is probably too high. But also as was the case in GMU3, we are not heading for disaster over the next couple of years because of an ever-increasing harvest. The harvest level instead is decreasing, even on POW, and there is not a need to eliminate fall guiding opportunities while a strategy is developed.

There is another factor that will be seriously influencing how many non-residents will be traveling to Alaska to hunt over the next several years, and that is the national economy. Hunting vacations are paid for with discretionary income and discretionary income for many people is evaporating into thin air, particularly for the average black bear hunter who tends to be of the blue-collar working class. Guides are already seeing cancellations for next year and that trend is likely to continue for several years.

This is probably a good place to talk about the economics of guiding. Our business is comprised of brown bear hunts, black bear hunts, and summer sightseeing cruises. We MUST do all three in order to stay in business. Guiding is not such a lucrative business that we can just pick and choose what we do. Costs of doing business, fuel, insurance, permit fees, etc. are all high and continue to get higher each year. We MUST be busy in the field from mid-April through late September in order to survive. Proposal #36 will eliminate one third of our black bear guiding business. This will have a huge impact on our bottom line, particularly when combined with the difficulty in bookings with the poor economy and the increasing costs of doing business.

Another factor that most people would not be aware of has to do with our Forest Service permitting system. The "priority use" allocations authorized by our special use permits is calculated based on actual past use. If we are unable to conduct fall black bear hunts we will lose that amount of priority use. Those hunts would be lost to us forever and can then be reallocated to new users, potentially resulting in further over-crowding in the spring.

If ADF&G is adamant about reducing hunting pressure in the fall, perhaps a compromise idea would be to allow guided hunters to continue to hunt beginning Sept 1, along with the resident hunters, and all other non-resident hunters would begin on September 15. Since the immediate concern really is about the non-resident harvest on POW, and since the guided non-resident component is the smallest component of the black bear harvest on POW then this idea would serve to reduce the hunting pressure without the negative economic impact on the guides, many of whom in Southeast are residents or rural communities currently facing serious economic difficulties.

I am very much against proposal #36. It places an unfair economic burden on established guides that have been working for years to stabilize the black bear situation in Southeast Alaska. On the other hand, it potentially can advantage those that have been worsening the problem. We have a need for a better management plan for black bears but there is not a need for eliminating guiding opportunities while it is developed.

Proposals 37, 38, 39: Black Bear Registration

I am very much in favor of either a registration hunt for black bears in Southeast Alaska or else a harvest ticket/hunt report system so long as the harvest ticket approach results in a complete response rate from hunters. In the past, response rates on harvest ticket reports have been incomplete. Response to registration hunt reports on the other hand, is generally very good because of penalties associated with failing to report.

The information gathered from either method is critical to ADF&G's ability to formulate an effective black bear management plan for Southeast Alaska. I believe therefore, that there must be a serious penalty associated with failing to respond to either a registration hunt report or a harvest ticket report requirement. At a minimum, failing to report should result in exclusion from the next year's black bear hunt and a monetary fine of at least \$500.

Proposals 5, 41, 42: Black Bear Baiting

I believe that black bear baiting in Southeast Alaska has the potential to greatly increase wounding loss of black bears and therefore needs to be tightly controlled by ADF&G. Black bear hunters that bait are generally bow hunters and bow hunting on the average results in more wounded animals than any other form of hunting. Any system that requires these hunters to be more accountable is a good thing. I am in favor of Proposal 41 but against Proposals 4 and 42.

Proposal 24: Brown Bear Season

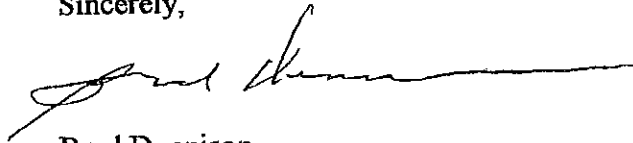
I am against extending the brown bear season to June 15 and against liberalizing the bag limit to one bear every year. Such regulations might make sense if we had a predator control issue in Southeast Alaska but we do not. Instead, we have an already high harvest level that at times hits the ADF&G guideline harvest caps.

Proposals 12, 13, 46: Wolf Season

I am in favor of Proposals 12 and 13, although I favor ending the season May 31 rather than June 30. Extending the season to May 31 would increase hunting opportunities for wolves without impacting the rearing of pups. There is an over abundance of wolves in Southeast Alaska and currently the sport harvest is low. I am opposed to Proposal 46 which would nearly eliminate sport harvest of wolves.

Thank you again for the opportunity to provide comments.

Sincerely,



Brad Dennison
Master Guide
Sitka, Alaska

Comments to the SE Board of Game for their meeting to be held November 7th - 11th.

I am a 68 year old; an Alaskan for 40 years. Never in my wildest dreams did I think I would become an advocate for beavers. But here I am writing the SE Board of Game to oppose proposals 15, 16, and 17 which extend the time beavers may be trapped. Proposal 17 includes a draconian proposal on bounties on beaver.

Through the years I have had opportunities to learn about these fascinating animals and the rich ecosystems they create, but nothing compares to my learning in recent months. I have joined a small cadre of individuals who under an agreement with the Forest Service to help hold down flooding on the trails, assist in beaver dam management and culvert clearing in the Dredge Lake area near the Mendenhall Glacier in Juneau. The Forest Service has recently stated they will give further support by replacing inadequate culverts; Trail Mix has agreed to assist with trail improvement. I am out in the field about 9 hours a week. The experience has deepened my respect for collaborative efforts in maintaining the area for multiple use including dog walking, duck hunting, biking, photography, wildlife viewing, moraine study, and fishing to name a few. Nearby schools regularly use the area to teach children about this unique environment, including the critical role of the beaver.

Lucky for me I work with knowledgeable and committed people. Among them are two environmental scientists who patiently answer my questions as we carry out our beaver dam patrols. I won't attempt a treatise enumerating the benefits of the ecosystem that is created by beavers, leaving that to the experts, but will share just one instance enumerated by Bob Anderson, renowned fisheries biologist, as we recently worked together. I asked how the beaver dams helped with fish habitat. He used the example of the Coho, explaining that the Coho is a very aggressive fish, especially in protecting its territory. The larger Coho will drive juveniles out of the fresh water areas where they were hatched before they are able to handle the salt water. As a result many juvenile Coho die. The beaver ponds and smaller dams on slews and other waterways create overflows and new habitat where juveniles can hide until they are large enough to handle the salt water. In other words, beaver areas = enhancing the Coho population.

Linking science and policy should be the context for fish and game regulations. I would hope that as you consider human requests/demands on the environment that

- multiple human interests will be considered;
- the environmental impact will be considered.

In the case of proposals 15, 16, and 17, that impact means weighing the broader environmental risk by depleting the beaver population below a healthy level. I strongly oppose these proposals. Human intervention into the beaver ecosystem has wiped out the beaver population in areas of the lower 48 so that now they must re-introduce beavers in order to overcome unforeseen consequences. Bounties are beyond thinking about, always difficult to regulate, costly, and at times with extreme results.

The story going around on the Haines proposals are that a few moose hunters there fear that the beavers will attract more wolves that will then kill all the moose, I hope that is not a true story. But given the proposals 31, 45, and 46 to extend wolf hunting/trapping, I wonder. Please put me on record as opposing those proposals as well and encouraging a link between science and policy rather than the anecdotal stories of a few individuals.

Thank you for your time and consideration of my comments.

Sincerely,

Patricia O'Brien
PO Box 32618
Juneau, Alaska 99803-2618

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*For 907 465-6094
ADF & G Board Support Sec
COMMENT# 52*

Lisa A. Mariotti
P.O. Box 22930
Juneau, AK 99802

October 24, 2008

Dear Chairman Judkins and Board Members:

The following are my written comments regarding the 56 Proposals the Board of Game (Board) will be considering during its November 7 - 11, 2008 public hearings and deliberations in Juneau.

PROPOSAL 1 - Lengthen the wolf trapping season for Unit 1A to run from November 1 to April 30 with no bag limit.

I oppose Proposal 1.

The reason given for this Proposal is to align the wolf trapping season with the peak of the deer rut season in Unit 1A to decrease perceived wolf predation on deer. The information provided in the Proposal is anecdotal. No deer population data is provided. Likewise, no biological data is provided that identifies wolf predation as the cause of any such deer population problems. Further, the data necessary to show the Proposal's impact on wolf populations and prey/predator ratios has not been provided. Finally, as indicated in the Alaska Department of Fish & Game's (ADF&G) Proposal 3 below, the correct management tool to address low deer numbers is to first reduce the harvest of deer and monitor the effect of such action. Extending the wolf trapping season and providing for no bag limit is an extreme measure that should not be adopted without substantial biological data to justify such action.

PROPOSAL 2 - Raise the management objectives for wolves in Unit 1A from twenty per year to twenty-five per year.

I oppose Proposal 2 for the same reasons indicated above in Proposal 1.

Further, there is no biological data provided to justify a change in the current management objective in Unit 1A from twenty wolves per year to twenty-five wolves per year.

PROPOSAL 3 - Reduce the bag limit for deer from 4 bucks to 2 bucks in certain portions of Unit 1A.

I strongly support this Proposal.

First, this will provide consistency within Units 1A and 1B, making the 2 bag limit consistent throughout the Cleveland Peninsula. As the Proposal indicates, "the existing clumped nature and

distribution of deer creates a situation for overharvest" in certain areas. This Proposal, which is based on harvest numbers and prey population data, identifies the root cause of low deer numbers in this area and correctly addresses the problem by limiting the harvest of this resource. I applaud the ADF&G in its efforts to increase the viability of a sustainable deer population in this area.

PROPOSAL 4 – Modify the bag limit for goat in Unit 1A from one goat to two goats.

I oppose Proposal 4.

The only reason given for increasing the bag limit on goats in Unit 1A is the high cost of flying into a goat lake to hunt. Economic impact on the hunter is not a factor to be considered in amending a management objective. Any such change must be based on scientific data to support the management objective change. None has been provided.

PROPOSAL 5 – Modify the black bear baiting permit conditions in Unit 2.

I oppose Proposal 5.

It appears that this Proposal is designed to achieve two things. First, eliminating the need for people using baiting and scenting stations to go in person to give the GPS coordinates for their baiting station. Second, adding an additional condition making the requirement to provide exact bait locations, including GPS coordinates or map markings voluntary.

The Proposal's author indicates that the reason for the Proposal (1) the high cost of travel between the local departments to register a bait station, (2) the inconsistency between baiting conditions in Unit 2 and other Units, and (3) providing GPS coordinates or site locations is likely to cause infringement and harassment issues.

First, the high of cost travel is not a factor that the Board needs to consider in determining how to best implement its enforcement of regulatory requirements such as registering a bait station. This cost is to be borne by the baiter and should not be considered in the Board's determination. Second, any inconsistency that exists between baiting station conditions in Unit 2 and other Units is being addressed in a separate Proposal, Proposal 41 to clarify the Board's intent in allowing the department to impose discretionary conditions on bait permit holders. Finally, the Proposal proponent's concern that the public will have access to information regarding baiting station locations that could lead to infringement or harassment is adequately addressed in the Board's regulations that make it illegal for any person to interfere or infringe upon a bait station, and imposing penalties on anyone found to have done so.

The current system of requiring GPS coordinates provides the department with a necessary tool to insure that bait and scenting stations are being established in accordance with the Board's regulations. Allowing voluntary and "by mail" compliance is not warranted.

PROPOSAL 6 – Eliminate the fall black bear sport hunt and limit spring non-resident sport hunt.

I support Proposal 6.

It appears from this Proposal as well as Proposal 7 that there is a serious decline in the black bear population on Prince of Wales (POW) and the cause is increased hunting pressure. The author of this Proposal does not propose eliminating all black bear hunting. The Proposal would still allow residents to subsistence hunt in the fall and still allow for a general hunt in the spring. This is a reasonable Proposal to address a problem that is leading to a dramatic and adverse affect on black bear populations on POW. This Proposal would be a prudent first step in bringing back the black bear population to a sustainable level.

PROPOSAL 7 – Close the black bear fall hunting season in certain portions of Unit 2.

I support Proposal 7 for the same reasons indicated in Proposal 6.

In addition, this Proposal's proponent indicates the increased frequency of seeing orphaned black bear cubs as a result of their mothers being harvested. This is a serious concern that the Board should look at very closely. With low black bear numbers already occurring, the loss of additional bear cubs from being orphaned and starving to death is adding more pressure on this resource. The Board needs to respond to this dramatic decrease in the black bear population before it reaches an unsustainable level, if it has not already declined to that point.

PROPOSAL 8 – Shorten the marten trapping season for residents, close the nonresident marten trapping season and create a Kuiu Island Management Area that is closed to the use of motorized land vehicles for trapping marten.

I support Proposal 8.

The evidence clearly shows that the species of marten, *M. caurina*, endemic to Admiralty and Kuiu Islands, is in serious decline with populations reaching an unsustainable level and facing possible extinction. However, Proposal 8 does not go far enough in addressing the magnitude of the problem.

The Board must act and close the marten trapping season on Kuiu Island until such time as the marten population is no longer teetering on the brink of extinction. This is a very serious conservation matter as fully set forth by ADF&G and the Board must act immediately and fulfill its constitutional duties to maintain wildlife in a sustainable manner.

Further, because *M. caurina* is an endemic species found only on Admiralty and Kuiu Islands, it may meet the criteria of a Distinct Population Segment under the federal Endangered Species Act (ESA), 16 U.S.C. § 1532(16), and be eligible for federal listing as either a threatened or endangered species. Any further decline in the population may warrant petitioning to have the species federally protected. To avoid federal intervention, the Board must act immediately to recover the marten population.

I strongly urge the Board to close all marten trapping on Kuiu Island until the population rebounds.

PROPOSAL 9 – Modify the Elk hunting season in Unit 3.

I oppose Proposal 9.

Proposal 9 asks the Board to provide for alternate bow and rifle seasons for elk on Etolin Island in Unit 3. It appears that the purpose of this Proposal is to increase the number of successful hunters, with "success rates being higher for rifle during the peak of the rut." The Proposal also indicates that rifle hunters are likely to benefit because there are "more rifle hunters than bow hunters." These statements raise several concerns. First, the success rate of hunters is not a factor to be considered in modifying hunting seasons. The sustainability of the resource is. Further, no analysis is provided to show the increase in number of elk harvested and the result on the elk population. The statement that "success rates being higher for rifle during the peak of the rut", if true, would have a direct effect on the elk population. Further, the fact that there are more rifle hunters than bow hunters would put increased pressure on the resource without justification. The Board must make its determination based on sound scientific data and none is provided to analyze the affect on the resource.

Finally, I question whether the Board can limit access of one user group to a resource by alternating rifle and bow seasons without violating the equal access clause of the Alaska Constitution. See *Tongass Sport Fishing Ass'n v. State*, 866 P.2d 1314, 1318 (Alaska 1994).

PROPOSAL 10 – Modify the moose antler restriction in RM038.

I oppose Proposal 10.

As the Proposal indicates, the existing antler restrictions "have done a good job of constraining the moose harvest to sustainable levels given the high level of interest and participation in the RM038 moose hunt." The Proposal offers no scientific justification for expanding the antler restrictions to include bulls with 2 tines on each side or how this regulatory change will affect the overall moose populations. The Proposal merely concludes that the antler restrictions "will provide for a healthy bull moose population which is being compromised at this time." No scientific explanation is provided for this conclusion and one is left to wonder how a healthy moose population is being "compromised" at this time. Finally, with the increased hunting pressure on moose and biological data that indicates a decline in the population, the Board should be looking at conserving more moose rather than expanding "harvesting opportunities."

PROPOSAL 11 – Modify the moose antler restriction in Units 1B and 3.

I oppose Proposal 11.

This Proposal raises a serious concern. Proposal 31 below seeks to extend the hunting and trapping season for wolf season based on anecdotal evidence that wolf predation is decimating moose herds in Unit 3. Similarly, Proposal 45 below seeks to extend the wolf hunting season in

Unit 1 based on the same reasoning. If this is true and there is a concern of decreasing moose populations in these Units, then no further expansion of moose hunting regulations should be allowed. The solution is not increasing moose harvests and allowing for the take of more trophy animals while simultaneously limiting the gene pool and increasing wolf harvests. The first step should be to limit the take of moose until the population rebounds. Finally, as with Proposal 10, there is no scientific data provided regarding the effect of the Proposal on overall moose populations in these Units.

PROPOSALS 12, 13, 45, and 31 – Extend the hunting season and bag limits for wolves in various management units.

I oppose each of these Proposals.

Each of these Proposals seeks to extend the hunting season for wolves as follows:

Proposal 12: August 1 to May 31 – Unit 3;

Proposal 13: August 1 to June 30 – Unit 3;

Proposal 45: August 1 to May 31 – Units 1 and 2;

Proposal 31: August 1 to May 15 – Unit 1D.

None of these Proposals provides substantial evidence that there is a need to increase wolf hunting seasons for any biological reason. The Proposals do not contain enough data for the Board to make an informed decision regarding the effect of each of these Proposals on wolf populations. Further, Southeast Alaska wolves are denning and females are near full term in April with young pups arriving during the month of May. This extended period would allow hunting of female wolves with pups being harvested and leaving totally reliant wolf pups abandoned and starving to death. Not only is this inhumane, but the mortality rate of these wolf pups would significantly increase the overall wolf mortality rate. No analysis is provided in any of these Proposals regarding this significant and relevant population factor that the Board must fully evaluate in order to proceed with any of the Proposals. Without the necessary data to support a Board decision, these Proposals must be rejected.

PROPOSAL 14 – Clarify the boundaries of the Blind Slough Closed Area in Unit 3.

I have no position on Proposal 14.

PROPOSAL 15 – Extend the beaver trapping season in Unit 1C.

I oppose Proposal 15.

The only reason given for the Proposal is speculative increased economic opportunity for profits in international markets. Extending the season for this purpose is not warranted in light of the fact that there is no bag limit for beavers during the current season. Further, there is no scientific justification to support extending the season and no data provided on the effect of the overall beaver population if this Proposal is adopted.

PROPOSAL 16 - Extend beaver hunting and trapping season in Unit 1D.

I oppose Proposal 17.

As indicated above in Proposal 13, extending the beaver hunting and trapping season is not warranted in light of the fact that there is currently no bag limit on beaver during the current season. In addition, no scientific data is provided to show the overall effect on the beaver population if this Proposal were accepted.

PROPOSAL 17 - Establish a bounty for taking beaver in Unit 1D.

I oppose Proposal 17.

Alaska's bounty programs were eliminated in the 1972 following strong public criticism when it became clear that they had a detrimental impact on wildlife populations and proved difficult to enforce. The legislature responded by eliminating appropriations to support such programs. Without strong legislative support to reinstitute such a program and a willingness provide appropriations, it is doubtful that any bounty system would be effective and could be enforced.

PROPOSALS 18, 19 and 20 - Lengthen the trapping season for mink and weasel, otter, and marten in Unit 1C.

I oppose Proposals 18, 19 and 20.

The only reason given for these Proposals is speculative increased economic opportunity for profits in international markets. No scientific justification is provided for extending the trapping season for any of these species and the impact on the various species' populations are unknown. These are relevant factors that the Board must consider in making any determination.

Further, in light of the fact that the Kuiu Island population of marten is near extinct, the state should not allow any expansion of trapping of either marten species until population data and the effects of trapping on the viability of these populations are known and thoroughly evaluated.

PROPOSAL 21 - Modify trapping restrictions for Unit 1C.

I oppose Proposal 21.

Proposal 21 would allow trapping within 50 yards of recreational trails. This Proposal raises serious public safety issues and should be rejected. 50 yards is an inadequate buffer to protect the public who, with increased frequency, use the Juneau trail system for recreational purposes. Instead, the Board should adopt Proposal 22.

PROPOSAL 22 - Modify the areas closed to trapping in Unit 1C.

I strongly support Proposal 22.

This Proposal, submitted by the Juneau State Park Advisory Board, will provide a necessary buffer zone on heavily used recreational trails in Juneau and provide for increased public safety. Anyone who has hiked or skied in Juneau knows that in a very short period of time fog and weather systems can move in severely limiting visibility. Even the most experienced hikers and skiers can quickly lose the trail and become disoriented. Having traps set close to heavily used recreational trails invites danger and injury to the public. This Proposal will allow all user groups to safely enjoy the trail system of Juneau and still provide trappers with ample trapping opportunities.

PROPOSAL 23 – Modify the regulation restricting the taking of white-phase black bear in Unit 1D.

I strongly support Proposal 23.

The Department has already attempted to protect cream-colored black bears known as "Spirit Bears". However, the Department's regulation proved unenforceable. These bears are a significant Alaska resource, providing viewing, photography and educational opportunities. Further, the Spirit Bear is regarded as sacred by some native communities. Finally, the gene pool for these bears will be eliminated if they are not protected due to increased trophy hunting pressure. I strongly urge the Board to support this Proposal.

PROPOSAL 24 – Modify the season and bag limit for brown bear in Units 1C and 4.

I oppose Proposal 24.

This Proposal is a one-two punch in the face of brown bear conservation: first by extending the brown bear hunting season and then by significantly increasing the bag limit from one bear every four years to one bear every year. No data is provided on how many more bears would be harvested and the resultant effect on the overall bear population in these Units. The Board must have substantial evidence providing a scientific basis to justify such a sizeable increase in bear harvesting to support such a Proposal. No such evidence has been provided.

PROPOSAL 25 – Modify the area closed to hunting big game in Unit 1D.

I support Proposal 25.

Proposal 25 raises a serious public safety concern when bears are shot from such a highly accessible, established recreational area immediately adjacent to a highway. This is an area frequented by thousands of people who travel from all over the world to see the largest gathering of bald eagles during the late fall silver salmon run. This coincides with the fall hunting season and can impair the recreational opportunities for all user groups. In addition, the presence of wounded bears in a growing residential area will inevitably lead to increased and tragic human/bear conflicts.

The Board should accept this Proposal which will provide all user groups with access to a world class resource and will not diminish the ability of hunters to harvest bear during the fall hunt since there is ample area for them to hunt.

PROPOSAL 26 – Establish an archery hunt for goat in Unit 1D.

I oppose Proposal 26.

The Proposal does not provide any biological data regarding the potential impact of establishing an archery hunt for goat in Unit 1D. I do note that the Proposal indicates that there is currently "no open season" on goats in these particular areas and question why the Board chose to close off this area. Without a biological justification, a determination of why the area is now closed, and analysis of the effect of this Proposal on the goat population, this Proposal should be rejected.

PROPOSAL 27 – Eliminate the antlerless moose season in Unit 1C.

Not enough information is provided to form an opinion on this Proposal. I would note, however, that this appears to be a Proposal to resolve a perceived allocation issue between bull moose hunters in Gustavus and Juneau cow permit holders. Further, I would note that no rationale is provided for how the cow permits affects hunters of bull moose in Gustavus as asserted in the Proposal.

PROPOSAL 28 – Replace the "any bull" hunt at Gustavus with an antler restriction limit.

I support this Proposal.

The Proposal appears to address an emerging management problem that has been occurring since 1997 resulting in the closure of the bull moose hunt every year by Emergency Order. This Proposal would provide the ADF&G with a management tool that is aimed at maintaining the sustainability of the Gustavus moose herd without having to result to issuing Emergency Orders once the herd has already jeopardized.

PROPOSAL 29 – Extend the damaged, broken, or altered moose antler regulation into a portion of Unit 1C.

I support Proposal 29.

The purpose of this Proposal is to clarify the original intent of regulatory language and include language that was inadvertently omitted from the original regulation. Further, it is logical from an enforcement standpoint that the regulation should apply consistently throughout the RM038 hunt area.

PROPOSAL 30 – Modify the eligibility and bag limit for subsistence moose hunt in Unit 1D.

I oppose Proposal 30.

There is no scientific justification provided for eliminating a Tier II subsistence eligibility program and opening up eligibility to "any Haines resident." The Board has full authority to establish and implement the current point system and without any evidence provided to substantiate elimination of this program, the Board should not consider this Proposal.

PROPOSAL 31 - Lengthen the hunting and trapping seasons for wolf in Unit 1D.

I oppose Proposal 31.

Please see comments provided on Proposal 12.

PROPOSAL 32 - Lengthen the season for trapping lynx in Unit 5.

I oppose Proposal 32.

The only justification provided for extending the lynx trapping season is for trappers to have to comply with the law (i.e. not illegally taking lynx or having to skin it and turn it into ADF&G). With the privilege of possessing a trapping license comes the reciprocal duty of complying with the Board's regulations or risk losing the privilege.

There is no scientific justification provided to support lengthening the lynx trapping and no data provided to analyze the Proposal's affect on lynx populations.

PROPOSAL 33 - Eliminate Unit 5 from trap identification requirements.

I oppose Proposal 33.

The state has good reason for requiring trappers to mark all snares and trapped with a permanent tag in order to identify the party responsible for the trap or snare. With the privilege of possessing a trapping license, comes the responsibility to comply with the law. Further, removing Unit 5 from a regulation that applies to all other Units in Southeast Alaska would lead to inconsistency in regulation which is not warranted.

PROPOSAL 34 - Shorten the wolverine trapping season in Units 1-5.

I support Proposal 34.

This Proposal submitted by the ADF&G is intended to maintain a sustainable population of wolverines in Southeast Alaska by limiting the harvest of females. This Proposal is based on sound science and justified by the Department's concern that the increased trapping pressure on this species could lead to unsustainable harvest levels.

PROPOSAL 35 - Modify trap marking restrictions for Units 1-5.

I oppose Proposal 35.

Please see my comments to Proposal 33 for the basis of my opposition.

PROPOSAL 35 - Delay the start of fall black bear hunting season to September 15 for non-residents in Units 1A, 1B, 1C, 2, and 3.

I support Proposal 36.

ADF & G has provided substantial data to justify this Proposal and has identified the root cause of the problem as non-resident harvesting of over 70% of the resource in these Units. The Proposal which would delay the start of the fall black bear hunt for non-residents is a narrowly tailored solution to address this problem.

PROPOSAL 37 - Establish registration hunt requirements for black bear in Units 1, 2 and 3.

I support Proposal 37 but prefer ADF&G's Proposal 38.

Proposal 37 will provide the Department with valuable information and data on black bear populations and dynamics that will assist in managing black bear populations. This data is vital in insuring that the Department has the information necessary to properly manage this resource. However, I prefer Proposal 38 which applies to all individuals hunting in Units 1-5.

PROPOSAL 38 - Requiring individuals to obtain a black bear harvest ticket prior to hunting black bear in Units 1-5.

I support Proposal 38.

Please see comments on Proposal 37 for the basis of my support.

PROPOSAL 39 - Require harvest tickets for hunting black bear in Units 1-3.

I support Proposal 39, but would prefer ADF&G's Proposal 38.

As indicated in my comments to Proposal 37, valuable information can be obtained from requiring harvest tickets prior to hunting black bears. However, this Proposal would only apply to Units 1-3 and it appears that only non-residents would be required to obtain harvest tickets. The ADF&G's Proposal set forth in Proposal 38 is more comprehensive, covers all Units and applies to all persons, not just non-residents. The accuracy of the data collected from this program needs to be as complete and comprehensive as possible. Therefore, I support Proposal 38, in lieu of this Proposal.

PROPOSAL 40 - Allowing only archers to operate bear baiting stations.

I support Proposal 40 as a positive first step in eliminating the practice of allowing bear baiting and scenting stations. Simply put, allowing bears to be shot while eating human supplied food

violates all notions of fair chase and ethical hunting. The Board should consider entirely eliminating this practice.

PROPOSAL 41 – Modify the current language to provide clarification regarding the intended authority regarding bear baiting permit conditions in Units 1-5.

I support Proposal 41.

Please see my comments on Proposal 5 for the basis of my support.

PROPOSAL 42 – Modify the black bear baiting permit requirements for Units 1-5.

I oppose Proposal 42.

Please see my comments to Proposal 5 for my concerns. In addition, allowing a person to "phone-in" their GPS coordinates will lead to an enforcement problem where anyone could call in GPS coordinates without having to provide the local office with evidence of a valid baiting permit or having to verify their identity.

PROPOSAL 43 – Allow deer to be bartered in Unit 1.

I have no position on Proposal 43. I would note however, that the purpose and intent behind the current regulation's limiting bartering to caribou in Units 22-26 should be examined by the Board before any determination is made.

PROPOSAL 44 – Modify the antler restriction for moose in Unit 1.

I oppose Proposal 44.

Proposal 44 raises serious concerns about the lack of enforcement of the moose hunting regulations in the Stikine River area. The solution is not to adopt a regulation that is inconsistent with the regulation governing other Units, but instead to enforce the current regulation and hold hunters who shoot illegal moose accountable. Effective enforcement resulting in fines and public embarrassment would likely serve as a deterrent and stop this illegal activity.

PROPOSAL 45 – Extend wolf hunting season dates for Units 1 and 2.

I oppose Proposal 45.

Please see my comments on Proposal 12 for the basis of my opposition.

PROPOSAL 46 – Modify wolf hunting season for Units 1, 3, 4, and 5.

I strongly support Proposal 46.

This Proposal would revert the hunting season for wolves to run from September 1 to March 31. A longer season is inappropriate because it overlaps the time when wolves are denning and pupping, making them highly vulnerable. This Proposal sets for substantial information regarding the effect of a longer season on wolf pup mortality rates. Adoption of this regulation will insure that high pup mortality rates during this period will not jeopardize the sustained yield and result in overharvest of the population. Further, the Proposal would not impede on any user group since the evidence shows that the economic value of wolf products during this period is essentially non-existent.

PROPOSAL 47 – Modify the season dates for hunting waterfowl in Southeast Alaska.

I have no position on Proposal 47.

One relevant factor that the Board needs to consider in deciding on this Proposal is the hunting pressure on resident species of waterfowl versus migratory waterfowl.

PROPOSAL 48 – Modify the methods for taking big game in Units 1, 2, 3, and 4.

I support Proposal 48.

According to the information provided, there is no justification for using 223 caliber full metal jacket bullets to harvest wildlife. Additionally, it appears that there are readily available, satisfactory alternatives at a comparable cost that will reduce the loss of game due to unnecessary wounding, maiming and crippling that occurs using 223 caliber full metal jacket bullets.

PROPOSAL 49 – Modify methods for taking black bear in Unit 25D.

I oppose Proposal 49.

The current regulations provide for no closed season on black bears in this Unit. This Proposal would allow the use of snaring black bears, taking them in river flats and taking of sows and cubs in dens. These practices have been made illegal for a reason and should remain so.

PROPOSAL 50 – Amend regulations to allow wolf denning in Unit 19.

I oppose Proposal 50.

The Proposal provides no justification for legalizing the disturbance and destruction of wolf dens. The Proposal itself indicates that the current wolf season and bag limits are sufficient at this time and that the present state predator management control program is effective. For these reasons, this Proposal should fail.

PROPOSAL 51 – Modify the methods for taking bears in Unit 19.

I oppose Proposal 51.

The Board has not been provided with sufficient information to adopt this Proposal. In essence, this Proposal would amend the methods of predator control in an intensive management unit. In order to proceed with amending intensive management predator control regulation, the Board must comply with other statutory and regulatory requirements.

In accordance with AS 16.025.255(e) regulations adopted for an intensive management program must be made "to restore the abundance or productivity of identified big game prey populations as necessary to achieve human consumptive use goals of the board in an area where the board has determined that:

- (1) consumptive use is preferred use;
- (2) depletion has occurred and may result in a significant reduction in the allowable human harvest of the population;
- (3) enhancement of abundance or productivity of the big game population is feasibly achievable utilizing recognized and prudent active management techniques.

In order to make these determinations, the Board must have baseline evidence of the moose population in this area; make a finding that there is a significant reduction due to bear predation and not some other factor; and, that the proposed management action will feasibly achieve enhancement of the moose population. The Board has not been provided with the substantial evidence necessary to make the required statutory findings and therefore can not adopt the Proposal. Any regulation issued would not meet the consistency requirements of the Alaska Administrative Procedure Act that "a regulation adopted is not valid or effective unless consistent with the statute and reasonably necessary to carry out the purpose of the statute." AS 44.62.030.

Further, the Board must consider the cumulative effect of each new method of harvest being proposed and the increased pressure on the bear population if adopted. Finally, the use of snow machines to pursue bears invites significant enforcement problems and could result in herding or harassment of bears in violation of 5 AAC 92.080(5).

PROPOSAL 52 – Allow the taking of black bear from dens in Units 21 and 24.

I oppose Proposal 52.

The Board has not been provided sufficient data to analyze the effect taking sows and cubs from dens on the overall morality rate of the population. Further, the Board has not been provided sufficient information to determine the effect of this Proposal on future reproductive rates and the resultant population effects.

PROPOSAL 53 – Allow the taking of black bear from dens in Units 21 and 24 using artificial light.

I oppose Proposal 53.

Proposal 53 would create a serious enforcement problem for the Department. This activity has been made illegal and no documented negative impacts have been provided. There is not substantial evidence to support legalizing this activity.

PROPOSAL 54 – Modify the predation control plan for Unit 21E.

I opposed Proposal 54.

Please see my comments on Proposal 51 for the basis of my opposition.

PROPOSAL 55 – Amend regulations for methods, seasons, and bag limits for taking predators in intensive management areas.

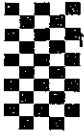
I oppose Proposal 55.

Please see my comments on Proposal 51 for the basis of my opposition.

PROPOSAL 56 – Create a new regulation allowing special hunts for disabled veterans.

I oppose Proposal 56.

This Proposal is not necessary. Regulation 5 AAC 92.104 allows for disabled hunters to obtain special permits upon meeting certain criteria. The current regulation applies to all disabled people equally.



RECEIVED
OCT 24 2008
11:44 AM

Donna S. Snyder
P.O. Box 734
Skagway, AK 99840
(907)983-3222
donnabadonna@yahoo.com

October 24, 2008

Fish and Game Board
Director: Kristy Tibbles
Fax: (907)465-6094

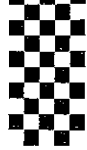
I am writing this letter in regards to the absence of enforceable regulation this spring in Skagway, when a "white-phased black bear" was shot with no consequences to the hunter.

I would like to request that the Board of Fish and Game work with whatever legal team is necessary to develop language within the Administrative Code number 85.015 to ensure future protection of specifically named animals. This could be a white bear, spirit bear, cream colored bear, albino bear white phased bear or even another species that may need protection.

I believe the particular bear that was shot this spring was special to the tourists that had seen it and many people who live in Skagway and surrounding areas. As this type of animal isn't a common occurrence and the gene that causes it to occur is rare, I feel that some type of protection for it and others like it is necessary in order to ensure that these animals will be around for future generations to enjoy.

Thank you,

Donna S. Snyder



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OCT 23 2008
BOARDS

FAX

TO: Board of Game
FROM: Janice Wrentmore
SUBJ: John Warder proposal
DATE: October 23, 2008

This past summer, the Department's regulation regarding Skagway's white-phased Spirit Bear proved to be unenforceable, causing a great deal of consternation within our community. This lack of enforceability is problematic not only for Skagway but also for the community of Juneau that requested similar protection for a bear in their area. Moreover, a poorly written regulation undermines the credibility of the department in all of its enforcement attempts.

The community of Skagway formally requested protection for a "white-phase" black bear described as "cream colored with brown ears". At the meeting held in Skagway this summer on this issue, remarks by Fish and Game staff appeared to indicate that there had been no communication between area biologists, legal staff and board members in the development of the language for this regulation, which merely stated "white-colored" bears.

It is my hope that the Board will address both the language of this ordinance as well as the apparent lack of communication between legal staff and game biologists. I urge the Board to give serious consideration to John Warder's proposal and create an ordinance that both the Department of Fish and Game and the Department of Law can stand by in the future.

Thank you,

Janice Wrentmore
Box 271
Skagway, Alaska 99840
907-983-2413

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COMMENT# 55

The Alaska Professional Hunters Association Inc.***Dedicated to the Conservation of Alaska's Wildlife Resources***

HC 60 Box 299C Copper Center, Alaska 99573

(907) 822-3755

October 24, 2008

Alaska Department of Fish and Game

Boards Support Section

PO Box 25526

Juneau, Alaska 99802-5526

Dear Alaska Board of Game,

Please receive the following comments on behalf of the Alaska Professional Hunters Association Inc., "APIHA" regarding certain proposals scheduled to be addressed during the Fall 2008 Southeast Region meeting. We have summarized below the proposals by number, which we support, oppose, or support with amendment and have followed with our comments regarding those proposals.

APHA held several long meetings with our members who operate in Southeast Alaska regarding proposals that are before you at this meeting. It is important for you to understand that the members of APHA who are affected by these proposals have a substantial background of caring about, living with and paying close attention to the wildlife in this region. We ask that you take this into consideration when receiving their written or oral testimonies, as well as the APHA testimony which is a summary of our many meetings regarding these proposals. We thank you for your consideration in these regards and for dedicating yourselves, as we have, to the best interest of Alaska's precious wildlife populations.

Proposals That APHA Supports:**3, 12, 23, 37, 38, 39, 41, 45, 48 and 50.****Proposals That APHA Opposes:****4, 5, 6, 7, 24, 25, 36, 42, 46, 43, 49, 50, and 54****Proposals That APHA Supports with Amendments:****13**

Comments as Follows:**Proposal 3, SUPPORT:**

We support this proposal as we feel that there is a biological concern for the deer population in this region and one-half of the peninsula already has the two-buck limit. As proposed, this will help in preventing overharvest, avoid confusion regarding harvest area and hopefully, help re-establish better science and management objectives.

Proposal 4, OPPOSE:

We appose this proposal for its conservation related concerns regarding potential of overharvest, and natural mortality for a species that has a slow reproductive cycle. Additional second animal harvest opportunity would be most likely impact nanny and kid populations. We recommend leaving at status quo.

Proposal 5, OPPOSE:

We oppose this proposal because it takes away from what we feel are very important accountability oversight of this type of hunting.

Proposal 6, OPPOSE:

There is no conservation or biological basis for this proposal.

Proposal 7, OPPOSE:

There is no conservation or biological basis for this proposal. Please additionally see our comments regarding proposal 36.

Proposal 12, SUPPORT:

We support this proposal based on it's given merits.

Proposal 13, SUPPORT With AMMENMENT:

We support this proposal based on its given merit but recommend an amendment be made to close the season on May 31st.

Proposal 23, SUPPORT:

We strongly support this proposal based on its conservation-based concerns. This rare resource needs this protection.

Proposal 24, OPPOSE:

We appose this proposal for its conservation related concerns regarding potential overharvest on a species that has a slow reproductive cycle. Additionally, for several years we have been near the SE Alaska Brown Bear Management Team recommended harvest cap. We recommend leaving at status quo.

Proposal 25, OPPOSE:

We encourage the Board to look into this situation for any common ground that can be found. Interpretive signing about how important hunting is to bear conservation may be appropriate as well as other measures that may be found to turn the user groups together.

Proposal 36, STRONGLY OPPOSE:

We appose this proposal for a number of reasons. It is important that you listen to how this proposal well adversely affect many long time established professional guide service providers who live and or operate in SE Alaska as well as the residents they employ and the local businesses that they work with. We feel that at this time there is no biological basis to reduce the hunting opportunity. There are a number of reasoning's for establishing this position and we will try to present them here for your review. **However, nothing brought forward here by APHA or by the Department achieves what we believe we really need to provide for the quality of conservation oversight and the hunting experience the wildlife and the public deserve, and that is a good management plan. We would encourage development of this needed goal.**

It is also important that the Board and the Department understand that we do have a concern for what may or may not be happening with the black bear population in SE but do not feel that at this time we need to be considering a reduction in opportunity. We understand that the sow harvest is greater during early September but there is undoubtedly going to be a period of time when this harvest is higher no matter how tight you close the season dates. **We feel that there a numerous reasons to take a slower path to address the conservation concerns. Please see the following points that we have established as a group who has more experience than any other living with and caring about SE Alaska's black bear population.**

The proposed reduction in black bear season dates is not justifiable at this time and creates a hardship long established rural Alaska businesses and those businesses and Alaska residents who support them.

Closing of the Sept. 1-15 portion of the black bear hunting season eliminates opportunity to hunt fall black bear as a single species hunt. The fall brown bear season opens on Sept. 15th and service providers would have to add another boat and crew to their operations, which is not economically feasible and adds more hunters into the field at the same time.

Currently there is a saturation of hunter effort. If the first 14 days of the black season is closed, it will increase the numbers of hunters during the second half of the month and have minimal actual harvest number impact.

The concern of overharvest of black bear has not been a result of the guided hunter activity but more a result of the transported and do it yourself type of non-resident hunt. However, by eliminating the first fifteen days of the season you will be imposing a significant hardship on the guided hunt industry and not any restriction on the transporter or do it your self type of hunter.

If this part of the black bear hunting season is closed, guided hunting service providers actually may loose that portion of their Priority Use US Forest Service allocation for non-use which will then be re-allocated to most likely, transporter type of businesses who have been responsible for the significant hunter increases.

There is no scientific justification to shorten the existing season dates at this time. Existing black bear harvest levels in GMU's 1 and 3 are not below the past 10 year average, and the existing harvest in GMU 2 is still much higher than it was ten years ago.

ADF&G does not have an established harvest directive for black bear management in these regions..

There is no biological support to shorten the season as the existing black bear population throughout SE is still above the past ten year average.

There is no good record analysis of hunter effort. We do not know the amount of hunter effort, the harvest success rates or the knowledge that hunting is actually affecting or how it is affecting the black bear populations.

It is very important that we work together to help gather better science and harvest information.

We support a registration hunt or an enhanced harvest report type of hunt to better define the hunting impact.

The harvest report data should contain a penalty for non-reporting such as if the hunter does not file their harvest report they can-not secure a hunting license the following year or something that helps make the reporting as good as possible.

Wounding constitutes harvest law should be worded in a very substantial manner on the harvest report and or registration hunt data.

We strongly believe that in the unguided non-resident hunter effort in SE, a substantial amount of wounding loss is occurring and that the hunters are disregarding the wounding constitutes harvest law.

There are a number of factors that are contributing to the decline in harvest seen in the past three years as follows:

The US Forest Service has capped the number of guide businesses allowed on Forest Service lands.

New regulations pertaining to the transporter industry accompanied with a more significant effort by Alaska's wildlife Troopers, The Forest Service and Department of Commerce to enforce existing regulations has resulted in a number of convictions of illegal commercial operators. These convictions and this enforcement effort has resulted in a noticeable reduction within the transporter industry of those who were operating outside of the law.

Transporter license renewals for operators who operate in this region have gone down as better accountability and oversight has been established.

Past years weather effects (late springs) have naturally resulted in a reduction of harvest

Low fish returns has displaced numbers of bears from traditional hunting and viewing areas.

As the North American economy has been more challenged during the past several years, there has been a reduction in the number of hunters and will continue to be.

The forest canopy is changing and clear cuts are growing in within the black bear habitat. As this occurs, the numbers of bears actually seen as well as harvested naturally is reduced.

More accountability requirements in black bear baiting has resulted in substantially less illegal activity at bait stations which has reduced overall harvest numbers.

We strongly support proposal number 41 submitted by ADF&G requiring better oversight and accountability of bait stations.

In previous meetings with the US Forest Service, we have heard them advocate funding support for ADF&G for better data gathering on black bear hunting. It would be good to see the two agencies working together on this.

Proposals 37, 38, and 39 SUPPORT:

We support a registration hunt or an enhanced harvest report type of hunt to better define the hunting impact.

There is no good record analysis of hunter effort. We do not know the amount of hunter effort, the harvest success rates the knowledge that hunting is actually affecting or how it is affecting the black bear populations.

It is very important that we work together to help gather better science and harvest information.

The harvest report data should contain a penalty for non-reporting such as if the hunter does not file their harvest report they can-not secure a hunting license the following year or something that helps make the reporting as good as possible.

Wounding constitutes harvest law should be worded in a very substantial manner on the harvest report and or registration hunt data.

Proposal 41, SUPPORT:

We support this proposal for its given merit.

Proposal 42, OPPOSE:

For loss of accountability and oversight which ultimately affects conservation.

Proposal 43, OPPOSE:

This concern can be dealt with between parties within existing transfer requirements.

Proposal 45, SUPPORT:

We support this proposal for its given merits.

Proposal 46, OPPOSE:

We have long supported "*balance for the whole*" management for Alaska's wildlife and not single species management when they can so significantly impact other important species.

Proposal 48, SUPPORT:

We support this proposal for its given merits.

Proposal 49 OPPOSE:

We currently oppose this proposal.

Proposal 50, SUPPORT:

We currently support this proposal.

Proposal 54, OPPOSE:

As written, we oppose this proposal. If a work group is established we would want to become part of it and be able to share our thoughts at that time.

End of APHA Comment's

Submitted on behalf of the APHA

Respectfully,



Robert Pithian

Executive Director

GLACIER ADVENTURES



KURT WHITEHEAD

Captain-Guide/Outfitter #1046

P.O. Box 6522

Sitka, AK 99833

www.AlaskaGlacierAdventures.com

kurtjw99@yahoo.com

(907) 738-5000

RECEIVED

FEB 2008

BOAS 006

Southeast Board of Game,

As an Alaskan Registered Guide/Outfitter and year-round resident of Prince of Wales Island (POW) and Southeast Alaska, I would like to comment on how some of the Proposals you are deciding on would negatively affect my small business.

Proposal 36 – We strongly oppose this proposal as it will unfairly and dramatically impact small businesses in the guiding industry.

This proposal is put before you by ADF&G mainly in response to GMU 2's high black bear harvest in 2005. From 1987 to 1997 the harvest was very steady from 200-220 bears per year. From 1997 it started to increase significantly to its high of 486 in 2005 and has dropped to 393 in 2006, 360 in 2007 and this year has dropped again.

Some major changes have been made since 2005 that have resulted in this harvest reduction that I will outline below:

ENFORCEMENT: Fish and Wildlife Troopers have made significant headway regarding illegal activity. Chris Palle, who was transporting bear hunters on the West side of POW and took an average of 40+ hunters for many years, is no longer in operation. Many transporters have curtailed their activity due to this bust alone and recently the bust of another person in Craig who was illegally guiding this year have made many people take notice, cease operations and/or clean up their act.

BAIT SITE REGISTRATION: Many nonresident bow and rifle hunters come to POW to hunt bears since the IFA Ferry's daily runs. Ketchikan make it so accessible. Many hotels and B&B's on the island cater to bear hunters and the hundreds of miles of logging roads and relative ease of travel to the lower 48 have made this a do-it-yourself hotspot. In years past, bait site registration could be done over the phone. Recently ADF&G wanted more accountability and they changed the law so you have to register in person. This increase in accountability has deterred many from illegal activity.

POOR ECONOMY AND COLD WEATHER: The past two years, the cost of fuel has skyrocketed as has travel expenses and the cold late spring has surely deterred many hunters as well as bears resulting in lower harvest.

LIMITING THE GUIDE/OUTFITTERS: In 2007 the Forest Service has limited the number of guide/outfitters that can conduct hunts on their lands and has also limited us to a specific number of hunts that we can conduct. No more guide/outfitters have been allowed to guide that did not show a historical record of guiding prior to 2007.

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VISIBILITY OBSCUREMENT: The vast logging that has occurred on POW in the past years has slowed dramatically and every year those clearcuts grow and the increased canopy restricts the visibility and makes hunting more difficult.

These major factors have all contributed significantly to the decrease in bear harvest on POW in recent years and further drastic cutbacks of closing the season seem too dramatic.

Myself and fellow guide/outfitters feel that closure of the Sept. 1 – Sept. 15 fall bear hunting season would severely impact our businesses and we would feel a significant loss of economic opportunity.

Some reasons this closure would be so severe to our businesses are outlined below.

FISH RUNS END AROUND SEPT. 15: In Southeast Alaska, most of the fish in the creeks are pink salmon and most of the fish are dying or are long dead by Sept. 15 so many of the big mature male bears we guide/outfitters and our clients are targeting are gone by this time.

INCREASING WEATHER ISSUES: Many severe storms and gales move through Southeast Alaska after Sept. 7 and the creeks flood out and flush many of the debilitated fish out to the ocean, which prevents us from hunting up the creeks effectively.

BEARS HEAD TO THE BERRIES: Many black bears are heading to the ripe berry crops up the mountain at this time and usually the first bears to leave the creeks are the big mature male bears we are targeting.

BROWN BEAR GUIDES SEASON CONFLICTS: Many of the brown bear guide/outfitters have conflicts with the season dates as the brown bear season opener is Sept. 15.

The last three years of reduced harvest should be enough of a decline to make the BOG not support Proposal 36 as it seems to be too dramatic of a change that negatively affects so many guides/outfitters that contribute significantly to their rural economy from bear hunting/guiding.

BETTER OPTIONS: Other less severe options would be to make this a registration hunt or an enhanced harvest report type of hunt to better define hunting impact and gather better data.

Currently we have no good record analysis of hunter effort, harvest success rates and how all this affects the black bear population.

The harvest report data should include a penalty for non-reporting so ADF&G gets quality data.

Wounding loss of unguided non-resident hunters is very substantial and we feel many of these hunters are disregarding the "wounding constitutes harvest" law.

This "wounding constitutes harvest" law should be worded in a very substantial way on registration hunts or harvest report data.

We need to work together to help ADF&G gather as much information and quality data to make informed decisions on this matter.

COMMENT#

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Another option would be to make this hunt a registration hunt or a harvest ticket hunt so the ADF&G can get more and better data on hunters in the field and hunter effort before making such a dramatic change as shortening the season.

Proposal 47 – We are in favor of this proposal as it would align the season dates with those of Kodiak, Southcentral, and the Alaskan Peninsula to allow sportsmen to hunt seaducks more effectively when they are in full plumage and concentrated closer to the coastlines. This would positively impact my business and contribute to the local economy by allowing us to guide waterfowl hunters until mid-January.

Proposal 3 – We are in favor of supporting this proposal as the deer herd is down on the Cleveland Peninsula.

Proposal 4 – We are not in favor of this proposal as the reproductive cycle of Mountain Goats is very slow and the winterkill is severe that increasing the bag limit could severely impact their populations.

Proposal 5 – We are not in favor of this proposal because as outlined earlier, by registering the bait station in person, it is a very effective management tool and we are against black bear baiting in general.

Proposal 6 – We are not in favor of this proposal as it is too severe and there are better management tools.

Proposal 7 – We are not in favor of this proposal as it is too severe and there are better management tools.

Proposal 12 – We are in favor of this proposal as there is no shortage of wolves in Unit 3 and it offers the sportsman a great opportunity.

Proposal 24 – We are not in favor of this proposal.

Proposal 40 – We are in favor of this proposal even though we are against bear baiting in general.

Proposal 45 – We are in favor of this proposal.

Proposal 46 – We are not in favor of this proposal.

The following guide/outfitters are also in support of this letter.

Mark Galla Alaska Peak & Sea's Wrangell, AK 907-874-2454

Keegan McCarthy Ocean Point Alaskan Adventures Juneau, AK 907-723-3006

Mike Sofoulis Alaska Coastal Guiding Auke Bay, AK 907-790-4868

Sincerely,

Kurt Whitehead

FW: BOG PROPOSALS

Subject: FW: BOG PROPOSALS
From: "Connie@akwildlife.org" <connie@akwildlife.org>
Date: Thu, 23 Oct 2008 16:38:39 -0800
To: "Nancy Wallace" <nancy@akwildlife.org>

-----Original Message-----

From: Pat Herben [mailto:patherben@gci.net]
Sent: Thursday, October 23, 2008 4:26 PM
To: Alaska Wildlife Alliance
Subject: BOG PROPOSALS

Having been opposed to game management practices developed to maximize sport hunting opportunities we want to be on record as SUPPORTING Proposals 46 and 22.

We OPPOSE Proposals 49, 54, 13, 1, 2, 12, 31, and 45.

We are particularly repelled by so-called "denning" and OPPOSE Proposals 50, 55, 51, and 52, The killing of wolf pups and bear cubs in their dens is a revolting practice and Alaskans should be ashamed to allow it to continue.

George Herben
4143 E. 112th Ave
Anchorage, AK 99516

Pat Herben
4143 E. 112th Ave
Anchorage, AK 99516

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OCT 24 2008

ALASKA DEPARTMENT
OF FISH AND GAME

RECEIVED

OCT 24 2008

BOARDS
ANCHORAGE

p174

Comments to BOG

Subject: Comments to BOG
From: Susan Sloss <jssloss@gci.net>
Date: Fri, 24 Oct 2008 10:28:08 -0800
To: info@akwildlife.org

Dear Board of Game Members:

I am a longtime hunter and my wife & I have been Alaska residents for 29 years, and we are writing regarding the following upcoming proposals:

SUPPORT

- 46 We support this important proposal, which would shorten the season for the taking of wolves and reduce the bag limit. The current season is excessive and allows the taking of wolves when pelts are not prime. Our proposal would allow enhanced opportunity for the taking of wolves with prime pelts. Additionally, this would prevent wolf pups from being orphaned in summer and early fall, and thereby kept from starving and dying inhumanely.
- 22 This excellent proposal was submitted by the Juneau State Park Advisory Board and would close to trapping areas in close proximity to a few heavily used trails, which would allow the vast majority of hikers and skiers to utilize these trails without fear of injury or death to their pets.

OPPOSE

- 49 Would allow the snaring of bears and the taking of bears in their dens.
- 54 Snaring would obviously lead to other incidental kills of other wildlife and is repugnant to most Alaskans.
- 13 This is one of a series of proposals designed to extend the season for wolves. This proposal would mandate only one month of closed season "æ" July. This would lead to the taking of wolves with poor pelts and doom wolf pups to be orphaned and die from starvation.

Similar and related proposals include 1, 2, 12, 31 and 45.

- 50 Would allow wolf denning.
55
- 51 Would allow bear denning.
52

Comments to BOG

These four proposals allow for the unethical and outlawed practice of killing infant wolves and bears in their den. A recurring argument in favor of this practice is that it is a traditional method of limiting wolf and bear numbers. This argument appears to have little, if any, voracity. Research indicates that Native Alaskans seldom, if ever, employ this method. Their reverence and respect for the animals they kill, coupled with a spiritual connection, stand in the way of such barbaric acts. Additionally, travel to the remote denning sites during May and June would have been a major obstacle to implementing this method. Public abhorrence is another factor arguing against this long-ago outlawed practice.

Thanks for the opportunity to comment.

Sincerely,

Jeff and Susan Sloss

740 5th St.

Juneau, AK 99801

comments on BOG proposals

Subject: comments on BOG proposals**From:** Gerald Brookman <brookman@alaska.net>**Date:** Fri, 24 Oct 2008 13:23:06 -0800**To:** Alaska Wildlife Alliance <info@akwildlife.org>, John Toppenberg <john@akwildlife.org>

From:

Gerald R. Brookman
715 Muir Avenue
Kenai, AK 99611-8816

To:

Alaska Wildlife Alliance

Since the Board of Game does not accept comments sent by e-mail, I request that you print out my comments, below, and deliver them to the Board of Game for consideration at their meetings in November. Thank you.

I support Proposal 46, which would help to prevent the taking of wolves when their pelts are not prime, and would help to avoid orphaning wolf pups at an age they would be unable to survive.

I support Proposal 22, which would help to avoid the trapping of dogs accompanying hikers and skiers along established recreational trails in the Juneau area.

I oppose proposals 49 and 54. Snaring is not an acceptable method of taking bears, and would undoubtedly lead to the taking of other non-targeted species.

I oppose proposals 13, 50, 55, 51, and 52. These proposals are all unsportsmanlike and I find it difficult to believe that any self-respecting Alaskan would wish to practice them.

Sincerely,

Gerald R. Brookman (An Alaska Resident since 1957)

p4884



Alaska Wildlife Alliance
P.O.Box 202022
Anchorage, AK 99520

To: Board of Game
RE: Positions on SE AK Regulation Proposals

RECEIVED

October 21, 2008

OCT 24 2008

**BOARDS
ANCHORAGE**

Dear Chairman Judkins and Board of Game Members,

Alaska Wildlife Alliance, { AWA }, is an Alaskan based non-profit organization which has advocated for and protected Alaskan wildlife since its founding in 1978. We believe that wildlife is a valued natural resource and that it should be managed using current scientific findings. We also believe that Alaska's wildlife should be managed for all user groups.

Following are our positions on the 56 regulation proposals that were submitted for the SE AK Board of Game meeting. We appreciate your time and attention to our assessments of these proposals.

Sincerely,
Alaska Wildlife Alliance and AWA Board of Directors

Proposal #1: OPPOSE- This proposal would lengthen the wolf trapping season in Unit 1A by ten days, so as to provide an earlier opening date. Currently the wolf trapping season opens Nov. 10 and ends April 30. There is no bag limit on trapping of wolves, although there is a bag limit of 5 wolves for hunting wolves in Unit 1A. We do not know what the department's position will be on this proposal. This proposal and Proposal #2 are both interrelated. Proposal #2 deals with the hunting seasons for wolf in Unit 1A. The goal of both proposals appears to be to increase the trapping and hunting of wolves so as to reduce their numbers. The current management objective for the annual taking of wolves is 20, and the proponent wants to increase that objective, and the take to 30 per year. Not biological justification is offered for either proposal.

Proposal #2: OPPOSE- The hunting season for wolves in Unit 1A is currently Aug. 1-April 30, and the bag limit 5. This proposal would remove the bag limit entirely. As discussed in regard to proposal #1, there is not justification for this proposal.

Proposal #3: SUPPORT- This proposal to conserve the deer population on the Cleveland Peninsula is important and AWA supports it.

Proposal #4: OPPOSE- This proposal would increase the bag limit for mountain goats from one to two in Unit 1A. The proponent's goal is to make it more cost effective to fly into high mountain lakes. The proponent states: " With a two goat bag limit maybe a few

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COMMENT# 61 P187

more people would go. " This isn't a reason that is based on the health of wildlife populations, which should be the management objective.

Proposal 5: OPPOSE- This proposal would relax regulations that were set into place by the ADF&G to carefully regulate black bear baiting on Prince of Wales Island. The department and many local residents have concerns re the apparent decreasing population of black bear on the island.

Proposal 6: SUPPORT- This proposal would eliminate the fall sport hunt of black bears in Unit 2. The proponent is Karen Petersen, and she states that she travels on a weekly basis all over POW, and that she sees far fewer bears than in the past due to over hunting by out of state sport hunters. Her proposal would not eliminate subsistence hunters in the fall, or the general hunt in the spring.

Proposal 7: SUPPORT- This proposal {like proposal 6} is by two individuals – Glen and Kay Keller- who are concerned about over hunting on POW. They would close the fall bear hunting season only on the north end of POW. They report seeing as many as ten orphaned cubs a year and believe the bear population has dropped dramatically.

Proposal 8: SUPPORT BUT WITH ADDITIONAL RESTRICTIONS- This proposal is by the department. It would shorten the marten season for residents to 15 days in Dec.- close the non-resident trapping season , and create a Kuiu Island Management Area that is closed to the use of motorized land vehicles for trapping marten. Kuiu Island is a large island lying roughly between Petersburg and Sitka. It is in Unit 3. The Department's biologists report that there are two types of endemic marten in Alaska, namely *Martes Americana* and *Martes caurina*, and that these two types are as different as brown bears versus polar bears. The biologists report that *Martes caurina* inhabit only 2 islands in the archipelago, Admiralty and Kuiu, and that there is very substantial evidence that *Martes caurina* is on the verge of extinction on Kuiu. The department's exact terminology is as follows: " Allowing the harvest to continue under present regulations despite such low population levels could result in an unsustainable *Martes caurina* population from Kuiu Island. The Dept's comments also indicate that it is the dept's opinion that closing the marten season entirely " may eventually be a necessary step..." The Dept. should not gamble on the continued survival of this species in SE AK. Kuiu should be closed to all marten trapping, entirely, with no subsistence or resident trapping season, until such time as the threat to the survival of this species is removed. That is what our constitution and statutes require. Conservation not extinction.

Proposal 9: NO POSITION- This proposal, by an individual, would modify in Unit 3 the season for elk so as to provide for an alternative bow and rifle season for elk on Etolin Island. It appears to be an allocation issue between different user groups.

Proposal 10: OPPOSE- This is a proposal by the Dept. concerning antler restrictions for moose in Units 1B, 1C, and 3. In essence, the Dept. is making the proposal because the Dept. is concerned that the current rules overly restricting the taking of large bull moose. Currently spike fork bulls, and large bulls with 50 inch spreads or 3 brow tines on one

side, can be taken. The proposal would loosen the restriction to allow the taking of large bulls with two brow tines on each side. Common sense dictates the conclusion that focusing of hunters on very large moose creates an artificial selection criteria, altering the gene pool. While the current regulation is bad, biology suggests that the proposal will make things worse. These complex restrictions allowing a trophy, and should be replaced with permit systems allowing the individual hunter lucky enough to win a permit, greater latitude in choosing his/her moose.

Proposal 11: OPPOSE- This proposal is essentially the same as proposal #10, but by an individual. It should not pass for the same reasons expressed in regard to Proposal #10.

Proposal 12: OPPOSE- This proposal would extend the wolf hunting season by 1 month, until May 31, in Unit 3. SE Alaska wolves are pupping during this time and it would be inhumane to kill adults when pups are reliant on them for survival. In addition the mortality of pups would add to the overall mortality of wolves in Unit 3 which may be detrimental to a healthy predator/prey population.

Proposal 13: OPPOSE- The statement that 'over population of wolves in Unit 3 is limiting moose, deer, and black bear populations' is anecdotal. To lengthen the wolf hunting season to June 30 is not scientifically based; therefore making this proposal unadvisable.

Proposal 14: NO POSITION- This proposal would clarify the boundaries of the Blind Slough Closed Area in Unit 3. It is by the Dept. and is made for clarification purposes.

Proposal 15: OPPOSE- This proposition to extend beaver trapping by 3 weeks in Unit 1C is not warranted as there are no bag limits on beaver during the season and an extended season could be detrimental to the population.

Proposal 16: Oppose- This proposal would extend the beaver hunting/trapping season by 4.5 months, Sept.1-June 30, in Unit 1D. This extension is extreme, particularly because there are not bag limits on beaver during the season. This extension is likely to be detrimental to the population.

Proposal 17: OPPOSE- This proposition would allow 'bounties' on beaver in Unit 1D. Bounties are historically difficult to regulate and when instituted have had dire consequences in eliminating/decreasing various species populations. Another reason to oppose this proposition is to ask the question: 'Who will pay for such beaver bounties?'

Proposal 18: OPPOSE- This proposal, by Barry Brokken, would lengthen the trapping season for mink and weasel in Unit 1C. The only purpose is "increased profit". No biological justification is provided, and its impact on these species is unknown. The current season is Dec. 1- Feb. 15, i.e. two and a half months. The proponent would have the season open on Nov. 10, which would be a substantial expansion of the season. There is no bag limit. Two and a half months should be sufficient for profit making by trappers of mink and weasel in Unit 1C.

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COMMENT# 61

P 387

Proposal 19: OPPOSE- This proposal by Barry Brokken, would extend the season for trapping land otter in Unit 1C. The purpose is "increased profit" according to the proponent. The current season is Dec. 1- Feb. 15. There is no bag limit. The proposal would have the season open earlier, on Nov. 10. Two and a half months should be enough for profit making by this individual.

Proposal 20: OPPOSE- This proposal by Barry Brokken would extend the season for trapping marten in Unit 1C. the purpose is "increased profit". The current season is Dec.1 – Feb. 15. There is not bag limit. In light of the near extinction of *Martes caurina* on Kuiu Island in Unit 3, the Dept. should reject proposals to increase marten trapping throughout SE AK, and instead consider restricting marten trapping until biologists have a better understanding of the viability of these populations throughout SE AK.

Proposal 21: OPPOSE- This proposition would create a public safety issue i.e. it would allow for traps to be set close to trails that are currently closed to trapping.

Proposal 22: SUPPORT- This proposal would institute safety measures on heavily used recreational trails, currently open to trapping, in Unit 1C. Public safety must come first in heavily used recreational areas.

Proposal 23: SUPPORT- This proposal would ensure that cream-colored black bears would be protected from hunting under enforceable regulations in Unit 1D. These bears are an important wildlife resource to protect as they provide appreciation/enjoyment for All user groups.

Proposal 24: OPPOSE- This proposal would extend the spring brown bear hunting season by 2 weeks in Unit 1C. Bears are vulnerable to hunters in the spring as they frequent intertidal/coastal areas where they can be easily seen and shot. This season extension is not congruent with brown bear conservation.

Proposal 25: SUPPORT-

Proposal 26: OPPOOSE- The plain language of this proposal suggests that a new goat area would be opened up in SE for purposes of an archery hunt. The language says that there will be a "loss of potential hunting area for bow hunters ". However, it also says that there is no existing goat hunt with bows in this area right now. Therefore, while it may not be a gain for bow hunters, it is not a loss. If there is no open season there now, there is likely a reason for this. Biologists likely recommended that there be no open season. Is there a biological reason that there is no open season there at the present time? The Board of Game should examine why there is no open season and look at the history of it and determine whether or not ther could even be a season there- can the population sustain the harvest?

Proposal 27: NO POSITION- The AWA takes no position on this proposal due to a lack of information in this written proposal.

COMMENT# 61 p 487

Proposal 28: SUPPORT-

Proposal 29: SUPPORT-

Proposal 30: OPPOSE- The Board of Game has the legal authority to establish a Tier II program on state lands. The author of this proposal wants to change the hunting regime from a Tier II system where you have to consider subsistence eligibility and criteria, to open the area up to anyone. Unless biological reasons have changed, Mr. Werner provides no biological justification for the proposal. His proposal is not based on anything scientific. There is no biological justification to change the hunt.

Proposal 31: OPPOSE- Extending the wolf hunting/trapping season in Unit 1D by 2 weeks, until May 15, because of the belief that the current wolf population could be detrimental and could decimate the moose herd- is anecdotal. There must be scientifically based data to support such a proposal. In addition, extending the season into May will cause more wolf pup mortality as a result of killing adult wolves who they rely upon for their survival.

Proposal 32: OPPOSE- This proposal concerns incidental catches where the wolf and wolverine seasons open up earlier than the lynx season. There is no biological justification identified for making this change. There has been a past, statewide effort to look at the lynx seasons and more conservatively manage lynx because of their status. ADF&G went to a more conservative season. Mr Newlun is recommending going in the opposite direction. The concern is with the lows in the snowshoe hare cycle and the potentiality that lynx hunting needs to be closed where the cycle of hares is low.

Proposal 33: OPPOSE- Tags were instituted in 2002. There was a good reason for tags because there had been a history of problems with traps set illegally. Without a tag, it is impossible to prove who illegally set a trap. The Board went to trap tag requirements in certain areas of the State. While some trappers have opposed it, they have mainly opposed it because they are concerned that they will be caught doing something they should not be doing and for which they can be proven culpable. They have not enjoyed this vulnerability. They have on worries or concerns if they comply with the law.

Proposal 34: SUPPORT-

Proposal 35: OPPOSE- The AWA opposes this for reasons cited in its opposition to Proposal No.33

Proposal 36: SUPPORT-

Proposal 37: NO POSITION- The AWA sees some benefit to this proposal. Requiring registration for black bear hunts provides more scrutiny, vigilance, and data. Persons would be required to come into a department office and register for the hunt. This can,

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P 5287

however, create a heavy workload for fish and game personnel. The AWA does not actively oppose or support this proposal.

Proposal 38: SUPPORT-

Proposal 39: SUPPORT-

Proposal 40: SUPPORT- This proposal limits bear baiting to registered archers only, of which there are far less than rifle hunters in the state. This is congruent with black bear conservation.

Proposal 41: SUPPORT- This proposal would enable the Dept. to implement important and necessary permit conditions to regulate hunting activity associated with bear baiting.

Proposal 42: OPPOSE- This proposal would allow anyone to call their position in the field into the Dept. without any way for the Dept. to check the legality of the caller.

Proposal 43: NO POSITION

Proposal 44: OPPOSE- This proposal is not conducive to the conservation of the moose herd in the Stikine River hunting area.

Proposal 45: OPPOSE- This proposal to extend the wolf hunting season by 1 month in Units 1 and 2, until May 31, is unwarranted and would be inhumane to pups born in the spring who are reliant on adults for their survival.

Proposal 46: SUPPORT- This proposal that would decrease the wolf hunting season by 2 months in Units 1, 3, 4, and 5 is warranted. The season would revert back to Sept. 1- March 31 versus the current season which is Aug. 1- April 30. Wolves killed in Sept. and April have less quality/value hides due to rubbing and being un-prime fur therefore continuing a lengthened season is not beneficial to trappers desiring maximum hide values. In addition pups who are orphaned in summer and early fall will continue to starve and die inhumanely unless the season is shortened. In addition it is in late April when female wolves are pregnant and near full term. It is inhumane to kill them and not sound conservation for a species with big game and furbearer values.

Proposal 47: NO POSITION

Proposal 48: SUPPORT

Proposal 49: OPPOSE- This proposal would allow the snaring of bears, killing of cubs, and the killing of females with cubs. This allowance would legalize current illegal hunting methods and is not acceptable for that reason.

Proposal 50: OPPOSE- This proposal would allow 'denning' which is an illegal hunting practice and therefore should remain so.

Proposal 51: OPPOSE- This proposal would allow denning and the killing of any black bear regardless of age or gender. This is currently an illegal hunting practice and should therefore remain so.

Proposal 52: OPPOSE- This proposal would allow an illegal hunting practice to become legal. This proposal should not become an exception to hunting practices.

Proposal 53: OPPOSE- We oppose this proposal for the same reasons that we opposed proposal #51, in addition we oppose it because it promotes artificial light i.e. 'jacklighting'.

Proposal 54: OPPOSE- We believe that this is an all out war on both brown and black bears and therefore do not support a proposal that ignores hunting ethics and bear conservation practices.

Proposal 55: OPPOSE- We oppose this proposal as it would allow wolf and bear 'denning' which essentially promotes the indiscriminate killing of both species.

Proposal 56: OPPOSE- This proposal would create special privileges in hunting not extended to other disabled hunters. Hunting is not intended as an award for military duty.

p7687

October 23, 2008

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OCT 27 2008

BOARDS

ATTN: BOG COMMENTS
AK Department of Fish and Game
Boards Support Section
PO Box 115526
Juneau, AK 99811-5526

To the Board of Game:

Alaska has been my home for thirty years. As a long time Alaskan, I am submitting the following comments:

PROPOSAL 1: OPPOSE

I oppose this proposal. There is no good reason to lengthen the wolf trapping season in Unit 1A.

PROPOSAL 2: OPPOSE

I oppose this proposal. This proposal and proposal 1 are an attempt to implement wolf control in Unit 1A without the controversy.

PROPOSAL 12: OPPOSE

I oppose this proposal. There is no good reason to extend the hunting season for wolves in Unit 3. There is plenty of daylight and April is a good weather month so hunters already can have a safe, comfortable hunt.

PROPOSAL 13: OPPOSE

I oppose this proposal. Allowing a hunting season that is eleven months long for wolves in Unit 3 makes no sense. Fur quality in the summer months is not good, and wolf pups will be orphaned and die. This proposal is nothing more than an attempt at wolf control in Unit 3 without the controversy.

PROPOSAL 21: OPPOSE

I oppose this proposal. The recreational trails in Unit 1C in the Juneau area should have trapping restrictions tightened not relaxed. This proposal will result in more dogs being injured or killed in traps, is a public safety concern, and will only result in more animosity towards trapping.

PROPOSAL 22: SUPPORT

I support this proposal. This change is needed in the interest of public safety and to prevent more dogs from being injured or killed in traps in Unit 1C along popular recreational trails in the Juneau area.

PROPOSAL 24: OPPOSE

I oppose this proposal. This proposal is nothing more than brown bear control for Units 1C and 4. Recruitment of brown bears is slow, and increasing the harvest from one brown bear every four years to one brown bear every year will result in too few bears.

PROPOSAL 31: OPPOSE

I oppose this proposal. Lengthening the hunting and trapping seasons for wolf in Unit 1D because the wolf population in the Chilkat "COULD have a detrimental effect on the moose herd" as the issue stated in the submitted proposal is not sufficient reason.

PROPOSAL 46: SUPPORT

I support this proposal. The wolf hunting seasons for Units 1, 3, 4, and 5 should be shortened. Current regulations mean wolves with fur that is not prime are killed, pregnant females are killed, and wolf pups are orphaned and die, and the regulations instill a sensibility that waste of a wildlife resource is acceptable.

COMMENT# 62

PROPOSAL 49: OPPOSE

I oppose this proposal. Permitting the snaring of black bears, killing them when they are swimming in the river, and killing them in their dens would be a giant step BACKWARDS for the Alaska Department of Fish and Game.

PROPOSAL 50: OPPOSE

I oppose this proposal. Allowing wolf denning, the killing of female wolves and their pups in their dens, would be a giant step BACKWARDS for ADF&G. Denning is a brutal and archaic practice.

PROPOSAL 51: OPPOSE

I oppose this proposal. Allowing bear denning, the killing of adult bears and cubs in their dens, would be a huge step BACKWARDS for ADF&G. Denning is a brutal and archaic practice. No closed season on black bears for residents in Unit 19 is not acceptable management.

PROPOSAL 52: OPPOSE

I oppose this proposal. Allowing bear denning in Units 21B, 21C, 21D, and 24 would be a huge step BACKWARDS for ADF&G. Denning is a brutal and archaic practice.

PROPOSAL 53: OPPOSE

I oppose this proposal. Allowing bear denning with the use of artificial lights in Units 21B, 21C, 21D, and 24 would be a giant step BACKWARDS for ADF&G. Denning is an archaic and brutal practice.

PROPOSAL 54: OPPOSE

I oppose this proposal for 20E. The proposal suggests allowing killing black and brown bears the same day airborne, killing any age or sex black and brown bears, snaring black and brown bears, and then allowing the sale of tanned or untanned skins and skulls from black and brown bears killed in 20E. Implementing these suggestions would not be management but an all out war on black and brown bears in 20E and a real black eye for ADF&G and hunters.

PROPOSAL 55: OPPOSE

I oppose this proposal. Killing female wolves and their pups in their dens is an archaic and brutal practice. Allowing the killing of female black and brown bears with cubs is not acceptable management.

Thank you for due consideration of my comments.

Sincerely,



Marilyn Houser
2411 Ingra Street
Anchorage, AK 99508

Brian Merritt
Box 401
Wrangell, AK 99929

Board of Game, ADFG
Boards Support Section
PO Box 115526
Juneau, AK 99929

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MAY 17 2011
BOARDS

RE: Comments on Proposal 10 and 11 for Fall Meeting

Chairman Judkins:

I have lived in Wrangell and hunted moose in this area for the last 20 years. I'm a member of the local fish and game advisory committee. I support proposals 10 and 11 which are basically the same. 10 was submitted by the department and 11 was by another local, long time moose hunter like myself. These proposals are needed because the SE, Alaska moose doesn't fit well into the spike, fork, 50", three brow tine system currently used at this time. For many years we as an advisory committee have struggled with what to do in our area to "fix" the problem of many bulls not ever becoming legal because they don't grow antlers that are bigger than 50" or grow three brow tines on one side at least. In an attempt to gather age data on two brow tine bulls, we suggested the 5 any bull drawing permits which was implemented four years ago. Information from age samples of bulls killed with two brow tines showed what a lot of the hunters already knew, bulls with two brow tines on both sides are 5-6 years old or older. The whole premise for the spike fork 50 regulations was to keep a certain amount of bulls in the population to assure cow breeding and eventually these older bulls could be harvested when they reached an age of 6+ years. This was not happening in SE since the moose don't normally grow three brow tines, (some moose develop 3 brow tines in our area but it is a small number).

One good point with any antler restriction hunt is no matter what the population of moose is, you will always leave a vital component of animals for breeding since you aren't shooting every bull.

Assuming this proposal is approved, I think we need to scrap the any bull permits that were previously offered by drawing. Obviously if we allow two brow tine bulls to be harvested then more bulls will be shot since some are now legal whereas before they weren't. In the last 5 years of moose hunting I have seen about 20 bulls. Out of these 20, two had two brow tines on both sides. I'm guessing this proposal will allow about 4-6 additional bulls to be harvested each year.

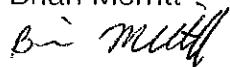
Since we are talking about moose in SE I would also like to add that the 50" part of the proposal needs to be removed!!! It is a very rare moose in our area that grows a rack that measures 50" or wider. What has been happening for years in the Wrangell area is guys see a large bull, shoot it and find out its only 44" or so, this bull is then left in the

COMMENT# 63

field to rot since the hunter doesn't want to receive a fine for this mistake. Every year including this one, bulls are found rotting in the field, due to some hunters wrong guess at rack spread. No moose this year were taken in the Wrangell area with a spread of 50". Since the hunter has to guess at antler spread, most of the time they are going to be wrong. We need to manage the moose herd with antler configurations that can be seen, which is not guessing if you study your animal. (If the bull has 2 brow tines on each side you can see that with binoculars, guessing at 50" just leads to wasted animals.) Hunters and guides in the northern part of Alaska have lots of large bulls to look at and the 50" regulation works well, it is totally out of place for our small SE moose.

Thank you for sitting on the board and considering my letter.

Brian Merritt

A handwritten signature in cursive script that reads "Brian Merritt".

ATTN: BOG COMMENTS
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094

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OCT 27 2008
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Proposal 16 – 5 AAC 84.270 Beavers: Oppose

Under most circumstances species like sockeye and coho salmon have no trouble negotiating beaver dams. If the water levels are low they simply wait for the freshets that are so common in our wet climate to sufficiently raise the water levels. Even on streams without beaver dams young and adult coho typically migrate to and from streams during periods of high water.

Beaver dams and the wetlands they create are known to enhance habitat for young salmon which may require 1-4 years of growing before they migrate to sea as smolts. In the Pacific Northwest beavers are being introduced in some areas in hopes of improving the declining runs of coho salmon.

Beaver dams and the wetlands they create are also known to enhance habitat for breeding waterfowl, river otters, mink, several species of songbirds, invertebrates and amphibians.

This regulation may actually do more harm than good to the salmon populations and other creatures that depend on the wetlands maintained by beavers.

Please listen carefully to the testimony given by professional fishery biologists.

Proposal 17 – 5 AAC 92.090 – bounty on beavers. Oppose

Under most circumstances species like sockeye and coho salmon have no trouble negotiating beaver dams. If the water levels are low they simply wait for the freshets that are so common in our wet climate to sufficiently raise the water levels. Even on streams without beaver dams young and adult coho and Dolly Varden typically migrate to and from streams during periods of high water.

Beaver dams and the wetlands they create are known to enhance habitat for young salmon which may require 1-4 years of growing before they migrate to sea as smolts. In the Pacific Northwest beavers are being introduced in some areas in hopes of improving the declining runs of coho salmon.

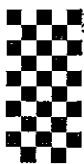
Beaver dams and the wetlands they create are also known to enhance habitat for breeding waterfowl, river otters, mink, several species of songbirds, invertebrates and amphibians.

Robert H. Armstrong (Fishery Biologist for 48 years in Southeast Alaska, also currently writing a book on local beavers)
5870 Thane Road
Juneau, AK 99801
586-6811
bob@discoverysoutheast.org

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COMMENT#

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7-27-2008
BOARDS

*Comments on Proposals for GMU 1(B) and/or GMU 3.
E.L. "Butch" Young*

Proposal 8. 5AAC 8.270(6) Furbearer Trapping. **Support.**

Restrict Kuiu Island marten trapping. Marten are extremely vulnerable to trapping. An intensive road system and deeply incised bays make much of Kuiu Island accessible to boat and vehicle trappers without the "refuge" effect that other islands have in hard-to-reach areas of southeast. Restrictions are necessary to continue to have a sustainable marten population on Kuiu to provide trapping in the future. ADF&G should continue to monitor marten population levels on Kuiu Island and closely monitor trapping effort to insure the proposal has the desired effect.

Proposal 10. 5AAC 85.045 (a)(1) Hunting season and bag limits for moose. **Support.**

Antler restrictions have been used throughout the state to reduce harvest of bulls to insure adequate numbers of bulls for breeding. Unit 1(B) and Unit 3 restrictions have accomplished that goal. ADF&G data shows that an excess of mature bulls occurs in these units. Bulls with 2 brow tines on each antler are mature and could be harvested. The proposal would increase the number of legal bulls available for harvest and would improve hunter success without detriment to the population. For consistency, and to avoid hunter confusion, all antler-restricted areas in the panhandle should have the same requirements.

Proposal 12. 5AAC 85.056. Hunting seasons and bag limits for wolves. **Support as amended.**

Amend proposal from August 1- [May 31] to August 1-**June 30**. Extend wolf season to [June 30] in Unit [1(B)] and 3. I suggest amending this proposal to include Unit 1(B) and extending the closing date. Historic data on wolf and deer populations in GMU 3 indicate that high deer numbers in the 60's were sharply curtailed by severe winters of deep snow coupled with wolf predation. Deep snow renders deer vulnerable to wolf predation in the beach fringe timber and on the beaches during winter. Because of the number of alternate prey species in Units 1(B) and 3, wolf numbers do not decline quickly when deer numbers drop. In addition to severe predation during winters with deep snow such as we have recently experienced, high wolf numbers take a tremendous toll on fawns as deer populations try to recover from a down cycle. Trapping has declined as boat fuel prices have increased. Allowing for the additional harvest of wolves could help reduce excessive wolf numbers and restore the deer/wolf balance. Petersburg residents often sight wolves in and around the city, preying on pets as well as deer which take refuge in yards. This is indicative of a high wolf population. Unit 1(B) is adjacent to Unit 3 and wolves consistently cross from the mainland (1(B))to adjacent islands (Unit 3) during low tide and should be included. I urge the Board to take action to avoid another decade-long closure of deer seasons in Unit 3.

*5AAC 85.056. Hunting seasons and bag limits for wolves.
Unit 1(B) and 3: Five wolves, August 1-[April 30] **June 30**.*

Proposal 13. 5AAC 85.056. Hunting seasons and bag limits for wolves. Support as amended. Amend proposal to include Unit 1(B). As outlined above in Proposal 12, burgeoning wolf populations are depressing deer numbers in Units 1(B) and 3. Unit 1 (B) should be included in the extended season to avoid a continuous supply of replacement predators from this adjacent unit. Wolf numbers in these units stay high for many years longer than deer populations after severe winters because of the buffering effect of numerous small mammals, songbirds, and waterfowl that are resident throughout the year in Southeast Alaska. These provide a food source for wolves and allow them to maintain their numbers as deer decline.

*5AAC 85.056. Hunting seasons and bag limits for wolves.
Unit 1(B) and 3: Five wolves, August 1-[April 30] June 30.*

Submitted by:

E.L. "Butch" Young
P.O. Box 2100
Petersburg, Alaska 99833

Proposal 42

Amend by author: Allen Barrette

5AAC 92.044 Permit for hunting black bear with the use of bait or scent lures. To not allow the department of F&G to add additional permit requirements that are not condition stated in code. In units 1-5. Without going through the board process.

Issue:

It is very clear that the dept. has misused or have been misinterpreting 5AAC 92.044 ^{with} ~~and~~ 5AAC 92.052.

The dept. has made additional requirements by giving GPS coordinates or an pin on a map for location of bear bait sites, and also turn in by mail the permit that was issued for the bear bait within 30 days of the end of the season. Without going through the board process.

1) 5AAC 92.044 states very clearly “A person may not establish a black bear bait station to hunt black bears with the use of bait or scent lures without first obtaining a permit from the dept.” “Under this section”.

Under 5AAC 92.004 there is no authority to make requirements of GPS, Location on a map, of a bear bait sight or turn in a bear bait permit by mail. Also makes no specific dept. location were permits are issued only states permits are issued by the dept.

2) How the dept has justified their authority to ad these “additional” requirements (not listed in 5AAC 92.044) to black bear baits permits is via 5AAC 92.052 discretionary permit hunt conditions and procedures. Where it states “The dept. may apply any or all of the following additional conditions to a “permit hunt” when necessary for management of the species hunted”.

I will show you how this code is incorrectly used and misinterpreted.

A) in the 1st sentence the language “Permit Hunt” is used.

Permit hunt is defined as 5AAC 92.990 (30) a hunt for which a permit is issued on a drawing or registration hunt basis

Registration permit is defined as 5AAC 92.990 (33)-

“Registration permit” means a hunting permit issued to a person who agrees to the conditions specified for each hunt; permits are issued in the order applications are received; and are issued beginning on a date announced by the department and continuing

(A) throughout the open season, or until the season is closed by emergency order when a harvest quota is reached; or

(B) until a predetermined number of permits have been issued;

In fact there are approximately 158 registered permit hunts in Alaska only of which 2 are black bear hunts. They are in 14C and only have weapon restrictions.

Point 1 being. If the department/BOG believed black bear baiting is a registered permit hunt one would believe that it would be clearly noted in regulation like all other 158 hunts.

Also 5AAC 92.049 clarifies that 5AAC 92.044 is not to be construed with 5AAC 92.052

it says -5 AAC 92.049. **Permits permit procedures and permit conditions** (a)A registration Tier II or drawing hunting permit required by this title will be issued under 5 AAC 92.050 – 5 AAC 92.052- 5 AAC 92.061- 5 AAC 92.063, 5 AAC 92.067, and 5 AAC. 92.070.

(b) The department shall produce an annual Tier II permit supplement and drawing permit supplement. For each permit hunt the supplement must set out the permit application procedures and permit conditions authorized under 5 AAC 92.050- 5 AAC 92.052- 5 AAC 92.061- 5 AAC 92.063, 5 AAC 92.067, and 5 AAC. 92.070.

Please notice no 5 AAC 92.044 underneath this section, but 5 AAC 92.052 is noted. So as you can clearly see a registration permit hunt is different than obtaining a permit to hunt with bait. This is a method and means which to hunt bears in a general season bear hunt.

Point 2. Note the language used in the 2 codes.

5 AAC 92.044(A)states a person may not establish a black bear bait station to hunt black bears with the use of bait or scent lures with out first obtaining a permit from the department under this section.

The word “obtain” is used and not “register” nor is the word “register” used at all in the section.

5 AAC 92.052 (1) states a permittee shall “register”..... etc.

This again shows there is a difference between a **registration permit hunt** and a permit used as a method and means. This should not be taken out of context or be used in combination. **5 AAC 92.052** is to be use for discretionary permit hunts.

Which codified defines, for registration hunts drawing hunts and Tier II hunts all of which are in 5 AAC 92.049, and again 5 AAC 92.044 is not listed.

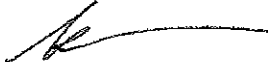
5 AAC 92.044 should be the only regulation used for the dictation of use of bait for black bears. Why else would it have an entire section and with its own code for the hunt?

Summary

In short I hope I showed you the board that 5 AAC.92.044 and 5 AAC.92.052 are ^{two} complete and separate regulations that have very different applications, one for discretionary hunts and the other for black bear baiting.

I also hope that if the dept. tries to add to regulation 5 AAC 92.044 this meeting that the board would differ them to the statewide meeting as this is a statewide issue and the public and advisory committees can make proper comments as this will have a president setting authority.

If language written in the codified can always be interpreted and taken out of context how can the general public know if he is in the right or wrong? One more Example I was told in 5 AAC 92.052,2 (b), 7. Are 2 examples of which site specific locations of bear baits can be used. The word **area** was interpreted as the example of why department could ask for a site specific location but if you read the section it plainly in context is stating about large units/zones etc. Not a specific point geographically.

Allen Barcoette


COMMENT# 66

**Western Interior Alaska Subsistence
Regional Advisory Council
c/o Office of Subsistence Management
101 12th Avenue, Room 110
Fairbanks, Alaska 99701
Phone: 1-(907)-456-0277 or 1-800-267-3997
Fax: 1-(907)-456-0208
E-mail: Vince_Mathews@fws.gov**

October 31, 2008

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

Dear Board of Game:

The Western Interior Alaska Subsistence Regional Advisory Council, during its public meeting on October 28, 2008 in McGrath, Alaska, reaffirmed its February 2008 recommendations along with additional information from our recent meeting relating to traditional methods of harvesting black bears in Interior Alaska. The Regional Council is resubmitting its recommendations for your consideration during your November 7 – 11, 2008 meeting in Juneau, Alaska.

Note: This proposal was deferred from the March 2008, Interior Region meeting. It was previously listed as proposal 78.

PROPOSAL 52 — 5 AAC 92.085. Unlawful methods of taking big game, exceptions, and 92.260. Taking cub bears and female bears with cubs prohibited. Allow the taking of black bear from dens in Units 21 and 24 as follows:

Allow the taking of any black bear from dens, September 25 to May 1 in Units 21B, 21C, 21D, and 24.

COUNCIL ACTION:

The Regional Council supported this proposal. Passage of this proposal would allow a customary and traditional use to be allowed. This long-term traditional practice occurs throughout the Western Interior Region and the Regional Council highly supports it being recognized and provided protection in regulation. The Regional Council requests a positive customary and traditional use determination for this long practiced tradition.

Note: This proposal was deferred from the March 2008, Interior Region meeting. It was previously listed as proposal 79.

PROPOSAL 53 — 5 AAC 92.085. Unlawful methods of taking big game, exceptions, and 92.260. Taking cub bears and female bears with cubs prohibited. Allow the taking of black bear from dens in Units 21 and 24 as follows:

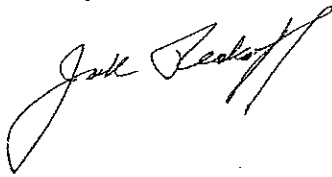
Allow the taking of any black bear from dens from September 25 to May 1 using artificial light in Units 21B, 21C, 21D, and 24.

The Regional Council supported this proposal. Passage of this proposal would allow a customary and traditional use to be allowed. This long-term traditional practice occurs throughout the Western Interior Region and the Regional Council highly supports it being recognized and provided protection in regulation. The Regional Council requests a positive customary and traditional use determination for this long practiced tradition.

The Regional Council is amicable to a later start date after mid-October.

Thank you for the opportunity to share recommendations and comments on proposal important to subsistence users of the Western Interior Region. If you have any questions, please contact me at 1-907-678-2007 or our coordinator, Vince Mathews (contact information in the letterhead).

Sincerely,



Jack Reakoff
Chair

cc: Peter J. Probasco, Assistant Regional Director, Office of Subsistence Management
Chuck Ardizzone, Board of Game Liaison, Office of Subsistence Management
Western Interior Regional Council members
Affected villages of the Western Interior Region