

ALASKA BOARD OF GAME
Southcentral Region Meeting
Anchorage, Alaska
March 13-17, 2015
On Time Public Comment Index

Dori Hollingsworth	PC001
Pere Davidson	PC002
Micah Miller	PC003
Jeffrey Davis	PC004
James M. McCann	PC005
Lisa Green.....	PC006
Theodore Bryant	PC007
Ken Green	PC008
Mike Chihuly	PC009
Penny Nixon.....	PC010
Maureen Peterson.....	PC011
Dorian Traylor	PC012
Nick Humphreys	PC013
Daryl Hollingsworth	PC014
Dennis Ackerman.....	PC015
Randy K. Rogers.....	PC016
Rod Berns.....	PC017
Chris Brehmer	PC018
David Ellision	PC019
Duncan Harrison	PC020
Jim Anderson	PC021
Russell Biggs	PC022

ALASKA BOARD OF GAME
Southcentral Region Meeting
Anchorage, Alaska
March 13-17, 2015
On Time Public Comment Index

Denise Abel.....	PC023
Theresa Bostwick.....	PC024
John Haddix	PC025
Barry Santana.....	PC026
Kate [Unkown].....	PC027
Janice Troyer.....	PC028
Jeff Schmitz	PC029
Mark Miraglia	PC030
MaryBeth Printz.....	PC031
W. Withrow.....	PC032
Stephan Hyams	PC033
Todd Smith.....	PC034
William Petrik.....	PC035
Andrea Lang.....	PC036
Dan Brandvold	PC037
Gail Boerwinkle	PC038
John M. Miller	PC039
John Rose.....	PC040
Jonathan Galin	PC041
Kyle Drasky	PC042
Jeremiah Prater.....	PC043
Marty and Annette Cordano.....	PC044

ALASKA BOARD OF GAME
Southcentral Region Meeting
Anchorage, Alaska
March 13-17, 2015
On Time Public Comment Index

Lance Raymore	PC045
Eric Lee	PC046
Madeleine Grant.....	PC047
Scott Breitsprecher.....	PC048
Andrew Scrivo	PC049
Warren Buck Brown	PC050
William Rice & Ann Williams	PC051
National Park Service	PC052
Denise Elder.....	PC053
USFWS Office of Subsistence Management.....	PC054
Donald Lietzau.....	PC055
Lance Kramer.....	PC056
Greg Jennen	PC057
Western Arctic Caribou Herd Working Group.....	PC058
Caren della Cioppa.....	PC059
David Hart.....	PC060
Janice Tower	PC061
Steve Colt.....	PC062
Jared Cummings.....	PC063
Brian Looney	PC064
Alaska Trappers Association	PC065
Patricia Dicraiker	PC066

ALASKA BOARD OF GAME
Southcentral Region Meeting
Anchorage, Alaska
March 13-17, 2015
On Time Public Comment Index

Jessie Alloway	PC067
Bill Sherwonit	PC068
Michael Mandregan	PC069
Chugach State Park Citizens' Advisory Board	PC070
Northway Village Council	PC071
Julie Sadoris	PC072
Debrah Carlson	PC073
Tom McReynolds.....	PC074
Kent Bowman	PC075
JD Batove.....	PC076
Ken Green	PC077
Kay Thomas	PC078
Cherie Northon.....	PC079
Susan Serna.....	PC080
Gordon Jones	PC081
Renee Blake	PC082
John Kaiser.....	PC083
Keith Brownsberger	PC084
Colin Lindsey	PC085
Bryan Judge	PC086
Marybeth Holleman	PC087
Thomas Eley	PC088

ALASKA BOARD OF GAME
Southcentral Region Meeting
Anchorage, Alaska
March 13-17, 2015
On Time Public Comment Index

Municipality of Anchorage	PC089
Tom Honer	PC090
Laura Senddon	PC091
Jed Zimmerman	PC092
Louis Kane	PC093
Jack Reakoff.....	PC094
Maniilaq Association	PC095
Maxine Franklin.....	PC096
Paul Chanek	PC097
Jeffrey Kramer	PC098
Steven Aubry	PC099
Martha Wavrin.....	PC100
Johnell Olsson.....	PC101
Martha McGinnis	PC102
Craig Doser	PC103
Roger Martinez	PC104
Judy Kimminau.....	PC105
Lynn Mitchell.....	PC106
Ken & Kate Green	PC107
Joanie Martinez.....	PC108
Jos Bakker.....	PC109
Center for Biological Diversity.....	PC110

ALASKA BOARD OF GAME
Southcentral Region Meeting
Anchorage, Alaska
March 13-17, 2015
On Time Public Comment Index

Kenneth Wilkinson	PC111
Al Barrette.....	PC112
Friends of the Anchorage Coastal Wildlife Refuge.....	PC113
Dena Selby	PC114
Robert Archibald & Roberta Highland	PC115
Kachemak Bay Conservation Society.....	PC116
Alaska Backcountry Hunters & Anglers.....	PC117
Jim Broderick.....	PC118
Alaska Bowhunters Association	PC119
Kachemak Bay State Parks Citizens Advisory Board	PC120
Julian Mason	PC121
Carolyn Brodin.....	PC122
David Armstrong	PC123
Diane McRoberts Powers	PC124
Dianna Whitney	PC125
Duncan Keith	PC126
Jacky Graham.....	PC127
Janette Cadieux	PC128
Rachel Hatcher	PC129
Sylve Montalbo.....	PC130
Theo Lexmond.....	PC131
Jennifer McCombs.....	PC132

ALASKA BOARD OF GAME
Southcentral Region Meeting
Anchorage, Alaska
March 13-17, 2015
On Time Public Comment Index

Mike Daigneault.....	PC133
Michael Hawley	PC134
Matthew Keith	PC135
Lynne Doran	PC136
Laura Ashlock.....	PC137
William Clay.....	PC138
Jason Bickling.....	PC139
Guy Sachette	PC140
Yvette Galbraith.....	PC141
Anne Hope	PC142
Linda Feiler.....	PC143
Virginia Morgan.....	PC144
Sandra Holsten	PC145
B Atkinson	PC146
Daniel Jirak.....	PC147
Northwest Arctic Borough.....	PC148
Stephen Bartell.....	PC149
Tasha Jeffords	PC150
Keith Balfourd	PC151
Terry Overly.....	PC152
Matt Soloy.....	PC153
Darrin Anderson.....	PC154

ALASKA BOARD OF GAME
Southcentral Region Meeting
Anchorage, Alaska
March 13-17, 2015
On Time Public Comment Index

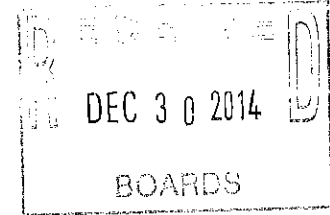
Robert Holbrook	PC155
Kathryn Recken	PC156
Dominic Bauer	PC157
Todd Pace.....	PC158
Robert Cassell	PC159
Kneeland Taylor.....	PC160
Wayne Hall	PC161
Martha Story	PC162
David Story	PC163
Diana Stone Livingston.....	PC164
Lance Kronberger	PC165
Marilyn Houser	PC166
Alaska Professional Hunters Association	PC167
Bari Cabana.....	PC168
Dana Bertolini.....	PC169
Kevin Asher	PC170
Tom Lessard.....	PC171
Mark Corsentino	PC172
Janice Crocker.....	PC173
Michael Kistler.....	PC174
Yolanda Dela Cruz.....	PC175
Ethan Williams.....	PC176

ALASKA BOARD OF GAME
Southcentral Region Meeting
Anchorage, Alaska
March 13-17, 2015
On Time Public Comment Index

April Warwick	PC177
Luke Graham	PC178
Colt Foster.....	PC179
Mark Luttrell.....	PC180
Bruce Graham	PC181
Stefanie [Unknown]	PC182
Dave Sullivan.....	PC183
Marilyn Houser	PC184
Lesa Miller	PC185
Kris Malecha.....	PC186
John Campbell	PC187
Mark Stiller	PC188
JoeRay Skrha	PC189
Jake Jacobsen.....	PC190
Greg Waisanen.....	PC191
Greg Pepperd	PC192
Darcy Davis	PC193
Dan Montgomery	PC194



William D. Rice, Jr. & Ann L. Williams
24331 Wilma Circle
Eagle River, AK 99577
(907) 696-0221



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

Chairman Ted Spraker:

My wife, Ann "Lulie" Williams and I are avid upland bird hunters. We are active members of the Arctic Bird Dog Association, the North American Versatile Hunting Dog Association, and past members of the Ruffed Grouse Society, numerous dog mushing clubs in Alaska, and past presidents of the Anchorage Skijor Club. We are commenting on board proposals #95 and #194, which are to be addressed at Board of Game meetings this winter. Please take our comments into consideration when deliberating on these two proposals.

PROPOSAL 95 – 5 AAC 85.065. Hunting seasons and bag limits for small game. Reduce the bag limit for ptarmigan, shorten the season, and add a no-hunt corridor along the roads in Unit 13B as follows:

Unit 13B five ptarmigan per day, 10 in possession [10 per day, 20 in possession] August 20-March 31; except that from January 1-March 31 there will be a five mile (2.5 miles either side of the road) no-hunting corridor along both the Denali and Richardson Highways.

The reason for this proposal from the Paxson AC is to address inadequately protected ptarmigan populations in subunit 13B, especially along the roadside. Reportedly ptarmigan densities off the Denali and Richardson highways are healthy, while those along the road are not. The current August 10 opening date does not protect juvenile birds. The early closure (November 30) does not allow for late season hunting, which is more likely to target populations farther from the road system. The present bag limit (ten per day, 20 in possession) is too liberal if we couple it with extended season dates.

While we agree the ptarmigan populations along roadsides have been stressed and that changes are needed, we disagree with the entirety of the proposed solution. Ptarmigan hunting has improved in 13B since the winter closure after November 30. We can support a reduced



bag limit at 5 ptarmigan per day and 10 in possession and a later opening date of August 20 to protect young of the year, but we think the winter closure after November 30 in this area is still warranted. We hike with our pointing dogs, mostly in September, and we do not clean out the birds we encounter.

In short, we Support proposal #95 with modification. *Reduce the bag limit to 5 ptarmigan per day and 10 in possession and change the opening date to August 20 as proposed, but retain the closure after November 30 in Unit 13B.*

Proposal 194 – 5 AAC 92.080. Unlawful taking of game; exceptions. Prohibit the use of hunting dogs for taking upland game birds after October 31, for South-central Region as follows:

Add a new line to 5 AAC 92.080

The following methods of taking game are prohibited:

(X) Use of a hunting dog after October 31 for the taking of upland game birds in the South-central Region.

The reason for this proposal is to prevent hunting dogs being caught in lawful traps, (during trapping season) while they are being used for hunting upland game birds.

While we appreciate the intent of the proposer Al Barrette to eliminate hunting dogs from being caught in lawful traps, we whole-heartedly disagree with the proposed solution. This proposal, if passed, would discriminate against lawful upland bird hunters, but other dogs could be caught in traps, such as those running free with skiers, snowshoers, hikers, skijorers, mushers, and others. We think other solutions would be better. Many outdoor groups invite the Alaska Trappers Association to present programs on how to recognize trapping areas and how to release dogs from traps, including conibear traps. Furthermore, we think trappers should mark the beginning and end of trap lines or individual trap sets (not unlike required signs for black bear bait stations) to give other legal travelers in the area fair warning of what is ahead. We understand many trappers are reticent to do so because traps have been vandalized, but disturbing a legal trap is strictly illegal. We think official trap line markers, similar to the bear bait station signs, would be adequate, especially if lawful information is provided and heavy fines are posted for vandalism. Most people would choose to avoid a series of traps with free ranging hunting or running dogs if they know the sets are present. We have personally turned around several times with our hunting dogs where we have seen black bear bait station warning signs along trails. We would do the same for trap sets. We are not interested in disturbing a set, nor are we interested in putting our dogs at risk. We think



trappers should avoid setting traps immediately adjacent to popular public trails and roads. A reasonable distance should be established, especially in South-central Alaska where thousands of people and their dogs ply the backcountry year around. We are not against trapping, and we both gladly wear winter furs while mushing dogs or snowmobiling in winter.

We **Oppose Proposal 195** in its entirety. We think better solutions are available, such as education and trap line markers.

Sincerely

William "Bud" Rice

William "Bud" Rice

Ann "Lulie" Williams

Ann "Lulie" Williams



United States Department of the Interior

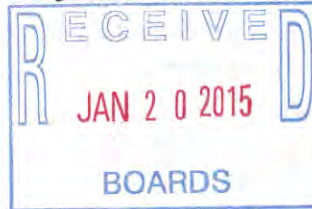
NATIONAL PARK SERVICE

Alaska Region
240 West 5th Avenue, Room 114
Anchorage, Alaska 99501

IN REPLY REFER TO:

7.A.2 (AKRO-RNR)

Mr. Ted Spraker, Chairman
ATTN: Alaska Board of Game Comments
Alaska Department of Fish and Game
Board Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526



JAN 12 2015

Dear Chairman Spraker:

Two additional proposals to come before the Board of Game (BOG) at the Southcentral Region March 13-17, 2015 meeting in Anchorage may affect or have the potential to affect wildlife harvest on three National Park System Preserve areas in Alaska (Bering Land Bridge, Noatak, and Gates of the Arctic).

Proposal 202 would change the caribou regulations for all game management units (GMU) associated with the Western Arctic caribou herd (WACH) and the Teshepuk caribou herd (TCH). The National Park Service (NPS) recognizes the conservation concerns raised by the significant decline in these herds and is supportive of the need to adjust harvest seasons and limits consistent with the rural priority outlined in ANILCA §804 and the Cooperative Management Plan. The NPS intends to provide detailed written comments before the end of the public comment on February 27, 2015 to allow additional time for discussions with area residents on other viable regulatory options.

Proposal 203 would close all Dall's sheep hunting seasons in Unit 23 and Unit 26A west of the Etivluk River drainage. The NPS currently supports this proposal because of the conservation concerns associated with the significant population decline.

The NPS also supports the development of companion federal subsistence program proposals intended to address these conservation concerns as appropriate.

Sincerely,

Debora Cooper
Associate Regional Director, Resources



cc:

Sam Cotten, Acting Commissioner, ADF&G
Kristy Tibbles, Executive Director, Alaska Board of Game, ADF&G
Bruce Dale, Acting Chief, Division of Wildlife, ADF&G
Pat Pourchot, Special Assistant to the Secretary for Alaska
Herbert Frost, Regional Director for NPS
Geoff Haskett, Regional Director, FWS
Chuck Ardizzone, Deputy Assistant Regional Director, FWS-Office of Subsistence Management
Frank Hays, Superintendent, Western Arctic National Parklands
Greg Dudgeon, Superintendent, Gates of the Arctic and Yukon-Charley
Jeanette Koelsch, Superintendent, Bering Land Bridge National Preserve
Mary McBurney, Subsistence Team Manager, NPS-Alaska Regional Office
Guy Adema, Natural Resources Team Manager, NPS-Alaska Regional Office
Bud Rice, Management Biologist, NPS-Alaska Regional Office
Andee Sears, Regional Law Enforcement Specialist, NPS-Alaska Regional Office



United States Department of the Interior
NATIONAL PARK SERVICE

Alaska Region
240 West 5th Avenue, Room 114
Anchorage, Alaska 99501



PC052
3 of 5

IN REPLY REFER TO:

7.A.2 (AKRO-RNR)

FEB 27 2015

Mr. Ted Spraker, Chairman
ATTN: Alaska Board of Game Comments
Alaska Department of Fish and Game
Board Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Spraker:

The National Park Service (NPS) made brief comments in a letter dated January 12, 2015 on proposals 202 and 203 submitted by the Alaska Department of Fish and Game (ADF&G) to come before the Board of Game (BOG) at the Southcentral Region meeting in Anchorage, March 13-17, 2015. These proposals may affect or have the potential to affect wildlife harvest on three National Park System Preserve areas in Alaska (Bering Land Bridge, Noatak, and Gates of the Arctic).

The NPS **supports ADF&G proposal 202 with modifications** as recommended in the February 4, 2015 letter from the Western Arctic Caribou Herd Working Group to the BOG. This proposal recommends changes to caribou hunting regulations for all game management units (GMU) associated with the Western Arctic caribou herd (WAH) and the Teshekpuk caribou herd (TCH). The NPS understands the conservation concerns raised by the significant decline in these herds, but we also recognize that natural cycles and processes have resulted in fluctuations in these caribou populations over the last several decades. The NPS is supportive of the need to adjust harvest seasons and limits where consistent with the Western Arctic Caribou Herd Cooperative Management Plan and the rural priority outlined in ANILCA §804. In short, these modifications would:

- Eliminate the harvest of calves by all hunters;
- Limit nonresident harvest to one bull, and eliminate nonresident harvest of cows or calves;
- Extend the resident cow harvest closure period in units 23 and 26A from May 16 – June 30 to April 1 – July 31.
- In Unit 22 retain the nonresident season for caribou harvest. The proposed season of August 1 – September 30 is impracticable because caribou are typically not in the area at that time and hunters may mistakenly take reindeer, which are present in the area;
- In Unit 23 change the nonresident hunting season to September 15 – October 10 to give the first caribou in the fall migration opportunities to cross major rivers in Unit 23 (e.g. Noatak River and Kobuk River) to set the migratory route, and to match the NPS start



date of September 15 for Commercial Use Authorizations for transporter a services.

The NPS supports the Working Group recommendations for five reasons:

1. NPS is a signatory to the Cooperative Management Plan;
2. The recommendations are consistent with actions identified in the plan for the estimated herd population;
3. The recommendations seem to reflect the majority public comments at various public meetings such as the Advisory Committee (AC) and federal subsistence Regional Advisory Council (RAC) meetings; and
4. The comments capture some of the regional variation, which needs to be accommodated.
5. These recommendations are consistent with NPS laws and policies, and are consistent with the 1982 NPS/ADF&G Master Memorandum of Understanding.

The NPS may offer additional comments at the BOG meeting pending additional recommendations from affected RACs and NPS Subsistence Resource Commissions yet to meet during this proposal cycle. The NPS looks forward to engaging in discussions about the WAH and TCH as the status of the herds change.

The NPS continues to **support the Alaska Department of Fish and Game (ADFG) proposal 203** to close all Dall's sheep hunting seasons in Unit 23 and Unit 26A west of the Etivluk River drainage. The NPS supports this proposal because of the conservation concerns associated with the significant population decline of Dall's sheep in those areas.

The NPS continues to support the development of companion Federal subsistence program proposals intended to address these conservation concerns, as appropriate.

Sincerely,

A handwritten signature in black ink that reads "Debora Cooper".

Debora Cooper
Associate Regional Director, Resources

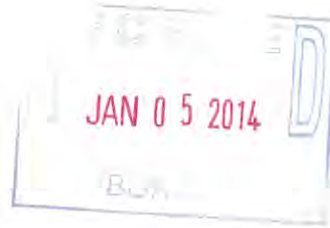


cc:

Sam Cotten, Commissioner, ADF&G
Kristy Tibbles, Executive Director, Alaska Board of Game, ADF&G
Bruce Dale, Chief, Division of Wildlife, ADF&G
Pat Pourchot, Special Assistant to the Secretary for Alaska
Herbert Frost, Regional Director for NPS
Geoff Haskett, Regional Director, FWS
Chuck Ardizzone, Deputy Assistant Regional Director, FWS-Office of Subsistence Management
Frank Hays, Superintendent, Western Arctic National Parklands
Greg Dudgeon, Superintendent, Gates of the Arctic and Yukon-Charley
Jeanette Koelsch, Superintendent, Bering Land Bridge National Preserve
Mary McBurney, Subsistence Team Manager, NPS-Alaska Regional Office
Guy Adema, Natural Resources Team Manager, NPS-Alaska Regional Office
Bud Rice, Management Biologist, NPS-Alaska Regional Office
Andee Sears, Regional Law Enforcement Specialist, NPS-Alaska Regional Office



20120 New England Drive
Eagle River, AK 99577 USA
December 30, 2014



Alaska Department of Fish & Game
Board of Game
Board Support Section
PO Box 115526
Juneau, AK 99811-5526

Gentlemen:

I just read in the Anchorage Dispatch News (December 30, 2014) that you are considering a moose hunt in Kincaid Park.

I cannot believe such an option is even on the table. The article suggests that maybe 20 to 30 moose inhabit the park. How can you possibly even consider killing animals in a PARK? Furthermore, why would people even have guns in a park? Is it a park, or is it a war-zone? I thought parks were for people to enjoy the serenity of being away from business activities. a place to wind down and/or participate in physical activities—all trying to restore one's soul. How can you relax, with shots being fired nearby? Am I being fired at? I like to walk on different trails—how do I know if there is a gunman poised around the next corner? Does he know it's a person approaching, or is it a moose?

This is Anchorage. We are in Alaska. We do have wild animals. Please face reality.

During the summer months, I spoke to a couple on a fishing charter out of Homer. The couple complained that they had recently visited Germany, but the people didn't speak English! Do you see any correlation? Get rid of the animals in the park so it's safe for ME.

Oh, I guess we could just put bitumen over the entire Kincaid Park, so that might discourage animals. Just get rid of nature.

And, surprisingly enough, I don't have any pets and I'm not a big animal lover—but I think fair is fair. I'd never do harm to an animal, and I definitely wouldn't go around shooting them. There is something basically wrong with this picture.

I'm vehemently opposed to any sort of hunting on parklands.

Sincerely,

A handwritten signature in cursive script that reads "Denise A. Elder".

Denise A. Elder



IN REPLY REFER TO:

United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE
1011 East Tudor Road
Anchorage, Alaska 99503-6199



FWS/OSM 15007.PM

FEB 10 2015

Mr. Ted Spraker, Chairman
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

Attention: Board of Game Comments

Dear Chairman Spraker:

The Alaska Board of Game is scheduled to meet March 13-17, 2015 to deliberate proposals concerning changes to regulations governing hunting and trapping of wildlife for the Southcentral Region. We have reviewed the 62 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 George Pappas, State Subsistence Liaison, 907-786-3822, with any questions you may have concerning this material.

Sincerely,

Eugene R. Peltola Jr.,
Assistant Regional Director
Office of Subsistence Management

Acting

Enclosure



Chairman Spraker

cc: Tim Towarak, Chair, Federal Subsistence Board
Chuck Ardizzone, Deputy Assistant Regional Director, Office of Subsistence Management
George Pappas, State Subsistence Liaison, Office of Subsistence Management
Chris McKee, Wildlife Division Chief, Office of Subsistence Management
Kristy Tibbles, Executive Director, Boards Fish and Game, Board of Game,
Alaska Department of Fish and Game
Bruce Dale, Acting Wildlife Division Director, Alaska Department of Fish and Game
Jennifer Yuhas, Federal Subsistence Liaison Team Leader
Alaska Department of Fish and Game
Interagency Staff Committee
Administrative Record



RECOMMENDATIONS
ALASKA BOARD OF GAME PROPOSALS

Southcentral Alaska Region

March 13-17, 2015

Anchorage, Alaska

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



PROPOSAL 140 – 5 AAC 85.045.(4) Hunting seasons and bag limits for moose. Reauthorize the antlerless moose season in Unit 6C.

Current Federal Regulation:

Unit 6C – Moose

Unit 6C—1 antlerless moose by Federal drawing permit only. Permits for the portion of the antlerless moose quota not harvested in the Sept. 1–Oct. 31 hunt may be available for redistribution for a Nov. 1–Dec 31 hunt. Sept. 1 – Oct. 31

Unit 6C—1 bull by Federal drawing permit only. Sept. 1 – Dec. 31

In Unit 6C, only one moose permit may be issued per household. A household receiving a State permit for Unit 6C moose may not receive a Federal permit. The annual harvest quota will be announced by the U.S. Forest Service, Cordova Office, in consultation with ADF&G. The Federal harvest allocation will be 100% of the antlerless moose permits and 75% of the bull permits. Federal public lands are closed to the harvest of moose except by Federally qualified users with a Federal permit for Unit 6C moose, Nov 1 – Dec. 31.

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January 14 through March 25, 2015.

Impact to Federal subsistence users/wildlife: Reauthorizing the antlerless moose season in Unit 6C will not impact Federally qualified subsistence users, as they can already harvest antlerless moose with a Federal drawing permit. Moose harvest is limited by annual quotas and reauthorizing the antlerless season will not impact the moose season.

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

Rationale for comment: While Federally qualified subsistence users already have an opportunity to harvest antlerless moose in Unit 6C, reauthorizing the State antlerless season will maintain management flexibility within the unit.

PROPOSAL 168 – 5 AAC 85.045.(13) Hunting seasons and bag limits for moose. Reauthorize the antlerless moose season in a portion of Unit 15C.



Current Federal Regulation:

Unit 15C – Moose

Unit 15C—1 cow by Federal registration permit only.

Sept. 1 – Oct. 31

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January 14 through March 25, 2015.

Impact to Federal subsistence users/wildlife: Reauthorizing the antlerless moose season in Unit 15C will not impact Federally qualified subsistence users, as they can already harvest antlerless moose with a Federal permit. Moose harvest is limited by annual quotas and reauthorizing the antlerless season will not impact the moose season.

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

Rationale for comment: While Federally qualified subsistence users already have an opportunity to harvest antlerless moose in Unit 15C, reauthorizing the State antlerless season will maintain management flexibility within the unit.

PROPOSAL 202 – 5 AAC 85.025 (a) (16) (17) (18) (19) (20) (21). Hunting seasons and bag limits for caribou and 5 AAC 92.085 (2) (D). Unlawful methods of taking big game; Change the caribou regulation for all game management units (GMU) associated with the Western Arctic Caribou Herd (WACH) and Teshekpuk Caribou Herd (TCH).

Current Federal Regulations:

Unit 21D – Caribou

Unit 21D, remainder – 5 caribou per day; however, cow caribou may not be taken May 16 – June 30

July 1 – June 30.

Unit 22 – Caribou

Unit 22B west of Golovin Bay and west of a line along the west bank of the Fish and Nikukluk Rivers and excluding the Libby River drainage – 5 caribou per day.

Oct. 1 – Apr. 30.

May 1 – Sept. 30, a season may be opened by announcement by the Anchorage Field Office Manager of the BLM, in consultation with



ADF&G.

Units 22A, 22B remainder, that portion of Unit 22D in the Kougarruk, Kuzitrin (excluding the Pilgrim River drainage), American, and Agiapuk River drainage, and Unit 22E, that portion east of and including the Sanaguich River drainage – 5 caribou per day; cow caribou may not be taken May 16-June 30. July 1 – June 30.

Unit 23 – Caribou

Caribou: 15 caribou per day; however, cow caribou may not be taken May 16-June 30 July 1 – June 30.

Unit 24 – Caribou

Unit 24 – that portion south of the south bank of the Kanuti River, upstream from and including that portion of the Kanuti-Kilotina River drainage, bounded by the southeast bank of the Kodosin-Nolitna Creek, then downstream along the east bank of the Kanuti-Kolitna River to its confluence with the Kanuti River – 1 caribou. Aug. 10 – Mar. 31.

Unit 24, remainder – 5 caribou per day; however, cow caribou may not be taken May 16-June 30 July 1 – June 30.

Unit 26 – Caribou

Unit 26A – 10 caribou per day; however, cow caribou may not be taken May 16-June 30 July 1 – June 30.

Unit 26B – 10 caribou per day; however, cow caribou may be taken only from Oct.1-Apr.30 July 1 – June 30.

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January 14 through March 25, 2015.

Impact to Federal Subsistence users/wildlife: There will be some reduction in harvest opportunity (i.e. the restriction on the harvest of calves and some unit specific resident season length reductions) for Federally qualified subsistence users, but these restrictions will be minimal and are appropriate for the conservation of the WACH and TCH. Reductions in harvest and shortening of season dates are a needed first step to promote recovery of the population.



Federal Position/Recommended Action: The OSM recommendation is to **support** this proposal for conservation purposes and to allow for the continuation of subsistence uses. The relevant Federal Subsistence Regional Advisory Councils (Councils) will be meeting in February and March of this year and will be submitting Federal proposals that are expected to mirror Proposal 202 with some region specific modifications. OSM would like to hear from the Councils prior to recommending more specific management actions.

Rationale: Due to the decline of the WACH and TCH as a result of increasing adult female mortality, poor calf survival, and low recruitment, more conservative management actions are needed now to reduce the caribou harvest in order to lessen the rate of population decline. These actions are consistent with the management levels identified for the WACH based on population size, trend and harvest rate in the revised Western Arctic Caribou Herd Cooperative Management Plan of 2011.

PROPOSAL 203: 5 AAC 85.055 (a) (9) and (10). Hunting seasons and bag limits for Dall sheep. Close all Dall sheep seasons in Unit 23 and Unit 26A west of the Etivluk River drainage (e.g., the Brooks Range west of Howard Pass). Retain hunt areas and hunt types (general season and subsistence hunts by harvest ticket hunts and/or permit) so similar hunt regimes may be restored when the population recovers.

Current Federal Regulations:

Unit 23— Sheep*

Units 23 – south of Rabbit Creek, Kiyak Creek and the Noatak River, and west of the Cutler and Redstone Rivers (Baird Mountains). **No Federal open season**

Units 23 north of Rabbit Creek, Kiyak Creek and the Noatak River, and west of the Aniuk River (DeLong Mountains) **No Federal open season**

Unit 23 remainder (Schwotka Mountains) **No Federal open season**

Unit 23 remainder (Schwotka Mountains) **No Federal open season**

Unit 26— Sheep*

Unit 26A – that portion west of Howard Pass and the Etivluk River (DeLong Mountains) **No Federal open season**

* All hunts under Federal regulations have been closed for the 2014/2015 season under Temporary Special Action WSA14-03 as of August 19 2014.



Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January 14 through March 25, 2015.

Impact to Federal Subsistence users/wildlife: Closure of the sheep hunts under State regulations would limit Federally qualified users to hunting under only Federal regulations. However, Federal harvest was closed under Temporary Special Action WSA14-03 for the 2014/2015 season and is expected to remain closed for the foreseeable future through Federal management action. Closure of all State general and registration hunts will help aid in the recovery of sheep populations in the western Brooks Range that have experienced drastic declines in recent years.

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

Rationale: Since 2011, sheep populations have declined 50-80% in the area affected by this proposal. In addition to the decline in the overall population, low numbers of rams, and the apparent very low recruitment rate all suggest that any harvest could be detrimental to the population; could prolong or worsen the current decline; and hamper recovery.



Submitted By
Donald Lietzau
Submitted On
2/1/2015 11:28:19 AM
Affiliation

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Proposition 194: NO vote

Please consider voting NO to proposal 194.

Discriminates against bird dog hunters and not all dog owners.

We have just as much rights to access and season lengths as trappers.

I hunt frequently and while I have seen traps in the field I have not had any accidentally catches with my dogs.

We all have to rights to access and use lands for our enjoyment.

I belong to numerous dog related hunting clubs in the State of Alaska and Nationally. As a serious dog hunter and owner I feel there should be a better way to keep dogs out of harms way when considering traps. This proposal goes way over board and should not be adopted.
Thank You.



Submitted By
Lance Kramer
Submitted On
2/2/2015 2:47:38 PM
Affiliation

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I support proposal 202 (18) (unit 23) as amended:

For Resident Hunters:

1. bag limit between March 15 and May 15 be three bulls and two cows

(Right now the bag limit just states, "5 caribou/day".)

This will: a. limit the take of pregnant cows and therefore increase cow survival and calf-production
b. keep the locals from being criminals

Subsistence hunters all across Unit 23 rely heavily on caribou, even in the spring as they're migrating back up north. We don't want to hinder the amount taken total, we just want to adjust the ratio.

I believe our RACs may amend NO COWS taken during this time; however, I believe that puts our Inupiaq People at risk of becoming criminals. They may travel miles for a hunt and only come across cows that day and we should allow them to at least take something home. Or they may accidentally shoot a cow, thinking it's a young bull. We don't want them to become illegal that way either.

2. Bag limit between October 15-Jan. 15 be two bulls and three cows

(right now, it's just 5 caribou/day, could be 5 bulls or 5 cows)

Our RACs up here may want NO BULLS to be taken during this time; however, I disagree with that.

This amendment will: a. decrease the take of stinky bulls, thus increasing the dangerously low bull/cow ratio.
b. prevent our Inupiaq People from becoming criminals

Again, some folks near the wintering ground may want to shoot some young bulls that may not be rutting. We should keep that opportunity open for them and take away the chance of becoming a criminal for food security reasons.

Non-Resident Hunters

1. Closed Season

This will: a. increase the bull/cow ratio of the herd as non-residents take nearly 600 bulls/year
b. allow for a more natural fall migration through the Delong and Brooks Ranges
c. limit user conflicts between Resident and Non-Resident hunters in the upper Noatak River



The bull/cow ratio is so low and the amount of harvestable surplus is near its critical level right now that possibly, we'll have to go into a more aggressive management style where we, by law, have to do predator control during the resident season. By closing the non-resident season now, we're just negating what we have to do next year anyway, we're just going to be ahead of the curve to see if we can begin increasing the bull/cow ratio before it drops even further.

Since non-residents take mostly bulls, this should hopefully save us around 550+ bulls to be available to breed shortly after the migration.

Submitted By
Greg Jennen
Submitted On
2/2/2015 6:40:53 PM
Affiliation



PC057
1 of 2

Proposal #210 – Oppose

Proposal 210 was inserted very late in the game with very little opportunity for public awareness of the proposal and will inject enormous uncertainty into every consumptive user's plans and can potentially devastate commercial operators whose businesses depend on a reliable season to fulfill their contractual obligations.

Dear Board of Game Members,

I would like to apologize for the late date I'm submitting my written comments. It wasn't until the two week deadline had passed that I was made aware that 210 was proposed and subsequently accepted as an agenda change request.

My name is Greg Jennen. I own and operate Alaska Glacier Mountain outfitters, LLC. My company has been operating in unit 6D for over a decade under a Chugach national Forest Priority use permit. From Valdez, we offer vessel based guided hunting trips in Prince William for brown and black bears in the spring and mountain goats in the fall.

Our black bear hunts are conducted after the close of brown bear season May 25 thru the end of black bear season June 10. Beginning in about 2008 we phased out our fall black bear hunts due to a severe lack of fish and subsequent lack of feeding bears on the streams of every bay of northwestern PWS. (This has persisted to this day) Later, the fall season was curtailed 10 days by F&G due to excess percent sow harvest during the fall season. It's fairly self-evident in our experience that the lack of substantial spawning salmon runs in is a mitigating if not the prime factor involved in the bear population decline.

Beginning in 2007 we have kept a record of the date and location of every single bear sighted on every hunt we do. In 2009 there was an abrupt decline in the average number of bears sighted, not a steady downward trend moving forward beyond 2009. As an example, in 2007 we spotted 26 bears on our June bear hunt; a good representative average. Last year (2014) we spotted 32 bears on this same trip. However our success rate was 100% in 2007 and only 25% in 2014. The reason being that virtually all of the 32 bears we spotted were over 2,000 feet MSL in the alpine eating over-wintered berries due to a profound lack of snow beginning the day the bears woke from hibernation and moving forward until the seasons end. Certainly there is a downward trend in the PWS black bear population, but spring 2014 harvest statistics need to be taken with a grain of salt if not discarded outright due to the conditions.

Proposal 210 would be a huge change in the regs, coming into the public eye at a very late date with very little opportunity for the public to educate themselves on the issue and to make comment. I personally only became aware of it through chance due to the fact that a good friend from Cordova caught wind of it at the regional advisory meeting held in there at the end of January. I know of no one from Valdez or anywhere else in PWS that was made aware of the proposal before now. Any proposal of this magnitude should be afforded a good opportunity to be discussed by the public before it makes it way to the board. In past years large changes in 6D regs were preceded by notice to most interested parties residing throughout the unit. This has not been the case here.

A registration hunt is the least favorable remedy to the decline in the black bear population in PWS for every user with the exception of non-consumptive. For resident hunters planning a vacation it would mean days taken from work would likely be for naught once the season closes weeks early as it surely will. Reservations with transporters would have to be cancelled potentially losing hunters deposits. Baits will need to be removed early or not placed in the first place and gear purchases and boat rentals will have been wasted.

From a commercial use point of view it will be devastating. Most transporters and Registered Guides are booked years in advance. (Personally, we're book through 2016) This will mean hunters will have flights booked, hotels reserved, licenses purchased and vacation days taken off only to have nowhere to go and nothing to do. For commercial operators this means any hunts booked will have to be refunded at the very last minute, once most of the expenditures for the trip have been paid and the operators can least afford it. Rescheduling the hunt to the following year will only conflict with the next year's bookings and postpone the likelihood of another disaster piled onto the previous years.

The irony of the situation is that this is all well-trodden ground. Southeast Alaska has very similar circumstances and has experienced very similar problems. It would seem obvious that the well-considered, successful plan used in recent years in Southeast Alaska should be the path taken in PWS. Not a rushed decision slipped in under the radar that will inject an incredible amount of uncertainty into every consumptive user's plans, be those users resident or non, commercial or recreational.

Regretfully I'm unable to attend the meeting in person. Currently I'm on the trade show circuit marketing my business. Were I aware of the agenda change request earlier perhaps I could have made arrangements. Or at minimum submitted my written comments before the 2 week deadline. Unfortunately, I've learned after many calls to other concerned folks, that I'm not the only one in this regrettable situation. Hopefully the cooler heads will prevail and a good, long-term, reliable fix will be compromised on without the impulse to just do *something*.

Best Regards,
Greg Jennen



PC057
2 of 2



Submitted By
Vern Cleveland, Sr.
Submitted On
2/3/2015 1:20:22 PM
Affiliation
Western Arctic Caribou Herd Working Group

February 4, 2015

ATTN: Board of Game Comments

Alaska Department of Fish and Game

Boards Support Section

P.O. Box 115526

Juneau, AK 99811-5526

SUBJECT: Board of Game Proposal 202 – 5 AAC 85.025(a) (16)(17)(18) (19)(20)(21) Hunting seasons and bag limits for caribou, and 5 AAC 92.085(2)(D) Unlawful methods of taking big game; exceptions. Change the caribou regulation for all game management units (GMU) associated with the Western Arctic caribou herd (WAH) and Teshekpuk caribou herd (TCH).

To the Alaska Board of Game:

On behalf of the Western Arctic Caribou Herd Working Group, the group's Executive Committee is submitting comments regarding Board of Game Proposal 202, to change the caribou regulation for game management units (GMU) associated with the Western Arctic caribou herd (WAH). The Board of Game will consider this proposal at its March 2015 meeting.

The Working Group's mission is to "work together to ensure the long term conservation of the Western Arctic Caribou Herd and the ecosystem on which it depends, and to maintain traditional and other uses for the benefit of all people now and in the future." At our December 2014 meeting, the Working Group talked at length about the importance of conserving the WAH while it is in decline.

The Western Arctic Caribou Herd Cooperative Management Plan (updated 2011) defines the herd's current population status as "declining conservative management level." The Working Group supports eliminating calf harvest, reducing the months in which residents can harvest cows, eliminating cow harvest by nonresidents^[1], and reducing the harvest of bulls by nonresidents. All of these measures are consistent with the Management Plan's recommendations for the conservative management level.

The Working Group recommends the following amendments to Proposal 202:

Unit 22

- Do not change the season for nonresident caribou harvest. The proposed change to August 1 – September 30 is not sensible for Unit 22, as caribou are typically not in the area during the proposed season. Offering a two-month season when caribou are usually absent may mislead nonresident hunters to plan hunts at a time when they might encounter reindeer, which are not legal game. Keeping the existing nonresident season will be less confusing to nonresidents attempting to hunt caribou in Unit 22.
- The Working Group supports the proposal in Unit 22 to eliminate calf harvest, eliminate nonresident harvest of cows, and limit nonresident harvest to one bull.

Unit 23

- Extend the cow closure period that prohibits the resident take of cows to April 1 – July 31 (longer than the current closure dates of May 16 – June 30). This change will reduce harvest of pregnant and lactating cows, increasing calving rates and calf survival.
- Change the season date for nonresident hunting of caribou to September 15 – October 10. These dates will give the first caribou in the fall migration the chance to cross the major rivers in Unit 23 (e.g., Noatak River, Kobuk River) prior to the onset of intensive nonresident hunting activity. The amended start date also matches the September 15 date used in the National Park Service's Commercial Use Authorizations for the start of guide and transporter operations.
- The Working Group supports the proposal in Unit 23 to eliminate calf harvest, eliminate nonresident harvest of cows, and limit nonresident harvest to one bull.

Southern portion of Unit 26(A)

- Prohibit the resident take of cows from April 1 – July 31. This change will reduce harvest of pregnant and lactating cows, increasing calving rates and calf survival.

Thank you for this opportunity to comment.

On behalf of the Western Arctic Caribou Herd Working Group,
Vern Cleveland, Sr., Chair



PC058
2 of 2

[1] The term “nonresident” refers to a hunter who is not a resident of Alaska.



Submitted By
Caren della Cioppa
Submitted On
2/3/2015 8:34:37 PM
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I have reviewed Proposal 180 submitted by Ken Green to restrict trapping in the Cooper Landing area.

I am quite familiar with all of the areas he has included in the proposal. These are areas heavily used by many recreational users. Traps placed close to areas frequently used by so many different users, including families with small children and pets, are a very dangerous hazard. Here in the Mat-Su Valley where I live we frequently have incidents with traps injuring and killing pets and putting our children in danger. I feel strongly that this proposal should be accepted so that the Kenai Peninsula area will be safe for everyone. His proposed regulations are very reasonable and in no way are detrimental to activities consistent with the code of ethics of the Alaska trapping community.



Submitted By
David Hart
Submitted On
2/3/2015 10:45:56 PM
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Hunter and Kinkaid park user

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Hunt proposal 150 is a great idea. I agree with ira edwards. There are a dangerous amount of moose in kinkaid park. Allowing disabled hunters the chance to participate in an alaskan meat hunt for moose accomplishes two worthwhile goals.

It is only a matter of time until a park user is injured at the park. Alaska is a huge state and we can afford to forgo a few moose in kinkaid to ensure park user safety and fill a few freezers.

Submitted By
Janice Tower
Submitted On
2/3/2015 11:15:35 PM
Affiliation



PC061
1 of 1

I wish to comment on Ira Edward's proposal for a limited moose hunt in Kincaid Park for disabled persons (Proposal #150).

I support the proposal as a means to improve public safety in this heavily used municipal park. The Kincaid Master Plan calls for high density recreation which includes Nordic skiing, soccer, mountain biking, running, walking, snowshoeing, disc golf, and a myriad of other non-motorized uses. As the City of Anchorage continues to grow, we can expect to see more people seeking outdoor recreation that is close to home. Kincaid Park is a popular urban park that is an asset to our community for the psychosocial and health benefits that outdoor recreation provides.

According to some, including Rick Sinnott, moose numbers are declining within city limits. However, in recent years increased use has increased the number of human/moose encounters in the park. In his Sunday, February 1, 2015 article in the Alaska Dispatch News, Sinnott states that "As many as 700 moose consider the Anchorage Bowl home during some winters. It's far easier to see a moose in Anchorage than in Denali National Park and Preserve." Considering the number of moose in Anchorage and given its urban nature, it would seem that we have an unnatural moose density in a relatively small area.

Whether this is desirable is a matter of public opinion, for some would state that this is Alaska at its finest--wild and natural. It's what makes living here and not California so wonderful. Although I tend to agree with this, I believe that providing a moose sanctuary in the middle of an urban park, whose master plan calls for high density recreation, is anything but wild and natural.

At some point authorities must make the better judgment that public safety overrides marketing strategies to make Anchorage the "City of Moose," where the only practical means of controlling the moose population is with the hood of a car. I can claim to have done my part in this with a moose resting squarely on the hood of my Suburban. Four thousand dollars of damage later and a bit of whiplash, perhaps a few families ate well that winter but it wasn't without a cost.

Another case in point: Two summers ago I was ushering a group of Mighty Bikes (a youth mountain biking program) on a ski trail in Kincaid Park. There was a downed birch tree blocking the trail so the kids dismounted their bikes and proceeded in single file around the stump end of the deadfall. While the kids were walking their bikes a young bull approached us from the ski trail at a full run. From the pinned ears and forcefulness of his charge, I could tell that he was going to run right through my group. I stood between the kids and the moose and discharged a short blast of bear spray toward the animal. The moose grew angrier and charged us again. I discharged another blast, this time longer. Fortunately the moose thought the better of continuing the assault and he moved in another direction. I should add that we did not pass this moose on the trail, nor was there any sign that the moose was being chased by something else. We were traveling in an uphill direction so our speed was very low. We did not startle the animal as he approached us well after the kids had dismounted their bikes and were making their way around the deadfall. For whatever reason the young bull was in a bad mood and was set on stomping his way through my group.

There are high profile moose encounters in the media and countless others that are never reported. Increased recreational pressure in the park and an unnatural moose density are threatening public safety and it will worsen.

The reason why there are so many moose in Anchorage is that there are few predators, an abundance of food and no hunting pressure. Given a choice between improving public safety and a marketing campaign touting Anchorage as a City of Moose, I choose public safety. I encourage the Board of Game to authorize a moose reduction plan in Kincaid Park whether by professional Fish and Game staff or by physically disabled individuals.

Submitted By
Steve Colt
Submitted On
2/4/2015 4:33:33 PM
Affiliation
citizen



PC062
1 of 1

Re: Proposal Hunt #150 Moose Hunt Kincaid Park

I am opposed to moose hunting in Kincaid Park. I have enjoyed Kincaid Park and its moose for 30 years on foot, skis, and bike, winter and summer. People can get along with moose. We all need to be alert and respectful. I am a lot more afraid of hunting in Kincaid than I am afraid of moose.



Submitted By
Jared Cummings
Submitted On
2/9/2015 5:50:51 PM
Affiliation

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Hello,

I am putting my thoughts and those of many others in writing so that they are heard by the Board of Game and all others attending in hopes that they will have some weight in the decisions made in regards to the Western Arctic Caribou Herd and the ability of residents of Unit 23, residents of Alaska, citizens of this country, and citizens of other countries being able to enjoy and utilize this resource.

There have been many articles written lately on the number of animals estimated in the herd and the concerns about the herd continuing to decline. I am not a biologist but I do know that herd sizes fluctuate naturally in their own cycle depending on natural factors. We cannot forget the herd was once down near 70,000 animals and grew to almost 500,000. Now the herd is at an estimated 235,000; this doesn't seem that bad considering where it has been in the past. I believe that in order to have healthy heard you need a healthy number of calves and in order to have calves you need cows! Concerns seem to be focused on resident and nonresident hunters taking bulls, but this does not seem to be the way to increase calf numbers because one bull can breed many cows. I am a resident and can take up to five caribou per day. Who really who needs five caribou per day, even when you might be hunting for your extended family?

As an owner of an air taxi that operates state wide in Alaska, our company provides transportation for many people in the Kotzebue region, to include hunters and nonhunters as well as residents and nonresidents. Many nonresidents choose to donate their meat, whether it be caribou or moose, due to the cost of getting it back home and the risk of it spoiling. Every year my company alone has a list that is 2 pages long of names and phone numbers from people living in Unit 23 that ask for donated meat and we gladly provide it for them. Again, it is the nonresidents that take these animals. I often choose to stay late to accommodate the local people that need meat, even delivering meat to elders who are unable to make it to our hangar. Additionally, we also have given to the boys and girls club in the past, whether it is meat or left over food from hunters and campers.

I am concerned about ending the season in September because many people enjoy coming to the area in October when there is less pressure and in the last few years we have seen change in weather allowing for people to be out in the field until mid-October or later due to the lack of snow and mild temps. From my personal experience in the last few years I have not seen the caribou in NW Alaska start rut until mid-October which seems rather late compared to elsewhere in the state. If it is the rut that we are concerned about, I would be curious why we should not hunt during the rut, and what it might affect aside from possibly bad-tasting meat. I have taken caribou in late October and tasted meat from hunters who took caribou in October that was delicious.

Finally, let's remember that years ago there were no caribou in this region at all; if people wanted caribou they had to travel towards Barrow. I do not believe that the taking of bull caribou are affecting the number of caribou available for harvest, rather it is the number of cows and calves being shot throughout the entire year or the fact that predator numbers have been on the rise in NW Alaska.

Thank you for this opportunity and in the end the state has done a fine job of managing our wildlife in this great state so I am confident the proper decisions will be made.



Submitted By
Brian Looney
Submitted On
2/5/2015 8:05:59 AM
Affiliation

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I support reducing the moose population in Kincaid Park.



Alaska Trappers Association
PO Box 82177
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ATTN: BOG COMMENTS
Alaska Department of Fish & Game
Boards Support Section
PO Box 115526
Juneau, AK 99811

February 6, 2015

Dear Chairman & Members of the Board:

On behalf of the nearly 900 members of the Alaska Trappers Association, we wish to share our opinions on several proposals which you will be considering during your March 2015 Region II meeting in Anchorage.

We SUPPORT proposals #144 - #147, which would modify hunting and trapping regulations on Kodiak Island. We respect the knowledge of ADF&G biologists and the judgment of Game Board members in matters such as this. We trust that both the biologists and the BOG members will make informed and reasonable decisions.

We take NO POSITION on proposal #177 which would realign starting and ending dates for beaver in Game Management Units 7 and 15:

- The proposal made no mention of the status of beaver populations in these areas. Information available to us provided conflicting views on this crucial aspect. We assume that beaver numbers are high, but could not confirm that.
- We were not convinced by the proposer's comments regarding ease and safety of travel during his new season dates. He seemed to contradict himself.
- We assume that the existing season was adopted based on extensive input from trappers and biologists. We were not convinced by the current proposal that there is a compelling reason to change.
- Once again, we trust ADF&G and the Board to make an informed decision.

We are OPPOSED to proposals #178 and #179, which would impose a system of trap identification on trappers in GMUs 7 and 15. We respectfully disagree with the Homer Fish & Game Advisory Committee that these actions would solve any perceived problems. The Alaska Trappers Association has a long history of opposing requirements of this nature. There is no proof that trap identification solves any problems. In fact, some of our members have experienced harassment as a result of trap identification requirements in other states. We have no desire to bring faulty "solutions" for non-existent problems to Alaska.

We OPPOSE proposals #180 and 181, which would ban trapping in large areas around Cooper Landing, Moose Pass and Seward. In late spring of 2014, we offered to work with the primary proponent of these proposals in an effort to resolve perceived conflicts. He rejected that offer. We participated in a public meeting with the proponent in June 2014. Representatives of various organizations and agencies advised the proponent to consider our offer. We attempted to negotiate with him on several occasions, but our offers were rejected. Shortly after the start of trapping season, we took matters into our own hands and posted signs around the area advising trappers to avoid locations and practices which might lead to problems. We are unaware of any problems this season. In short, we have taken the initiative to resolve past conflicts and prevent new ones. We firmly believe that regulatory closures are unnecessary. We urge you to reject these proposals.

We appreciate the opportunity to participate in the regulatory process.

Sincerely,

Randall L. Zarnke, President



Please no
in-city hunting
I agree with
attached



Kincaid moose hunt is ridiculous idea

I applaud Bill Sherwonit's recent commentary in ADN. The idea of a moose hunt at Kincaid is ridiculous. If we are going to start a moose hunt we should also include owls. Over the years a number of skiers and hikers using the Kincaid trails have been injured by owls, so if we are going to kill off the moose we should probably kill off the owls as well. And let's not stop there. In the past few years I have seen more and more black bears at Kincaid, including sows with cubs. They can be as dangerous as moose, especially in the spring. Perhaps they too need to be killed off. Then there's the moose I see almost every day during the fall, winter and spring in my Turnagain neighborhood. If they are dangerous at Kincaid then they must be equally dangerous in my yard or the yard of my neighbors. Maybe we should kill them off as well.

The argument that moose pose an unacceptable hazard to Anchorage residents is ridiculous. Be cautious and leave the moose, owls and bears alone so that we can all enjoy seeing them. It isn't only tourists who enjoy seeing the wildlife in Anchorage, but longtime residents do as well.

— John Miller
Anchorage

submitted by
Patricia Dicraiker

Submitted By
Jessie Alloway
Submitted On
2/8/2015 7:35:30 PM
Affiliation
Citizen/User



PC067
1 of 1

I oppose a moose hunt in Kincaid park. I'm a regular user of the park and a member of one of the dog associations that uses the park throughout the summer and fall. Contrary to how we were depicted in an ADN article, we are not an "attack dog group" and we were never contacted by Mr. Edwards for our viewpoint on his proposal. Although we regularly see moose during our training sessions, we have never had a problem. Why? Because we respect them, are aware of them, and follow rules of general land stewardship. We need to learn to share space with them and setting up another moose hunt is not the answer.

Our training group (depending on weather) often trains into October on the weekends. A hunt could potentially displace us for no need.

In addition to dog training, I also use Kincaid for walking and biking. Again, I respect the moose, am aware of them, and try to keep my distance. As long as all users take the necessary precautions, we should be able to coexist.



Submitted By
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Submitted On
2/9/2015 10:32:15 AM
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self

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As a longtime resident of Anchorage and one who regularly explores Kincaid Park (and other Anchorage parklands and greenbelts), I'm writing to express my strong opposition to Proposal 150, which would allow a moose hunt in Anchorage's Kincaid Park. I've already written about this in the newspaper and will use that commentary (below) as an extended explanation of my opposition:

Kincaid Park Is No Place for a Moose Hunt

While I applaud Rick Sinnott and the Alaska Dispatch News for alerting Anchorage residents to the new push for a moose hunt at Kincaid Park, both the reporting of this news and Ira Edwards' proposal to the Alaska Board of Game (BOG) raise serious concerns and demand further context and scrutiny.

First I'll address the story itself ("Moose hunt proposed in Kincaid Park," Dec. 29). The placement of Sinnott's piece—complete with front-page banner headline—suggests it's important local news. I agree. But it is also a lopsided story, heavily slanted toward Edwards' perspective. Nearly all the "reporting" is based his viewpoints and beliefs. His claims are largely presented as fact, without apparent verification and almost no rebuttal. This is disappointing, given Sinnott's own wildlife expertise.

Because this is a news story, Sinnott no doubt felt obliged to keep his opinions out of the piece, but he could have found others who would rightly challenge Edwards' assumptions and conclusions. Though Sinnott includes Department of Fish and Game findings that provide alternative perspectives, they are buried deep in the story and not used to directly challenge Edwards' claims.

Sinnott takes Edwards' statement that he "canvassed most organizations that schedule events in the park" at face value, as well as his claim that their responses ranged "from favorable to neutral." All of this is self-serving and should have been substantiated. The fact that "no organization has told [Edwards] it would oppose a moose hunt" means little, because we don't know all the groups he canvassed. I'm betting he didn't ask wildlife or conservation groups for their opinion.

Sinnott adds that a 2010 survey indicated 70 percent of local residents support an Anchorage moose hunt, including parks like Kincaid. But we don't know enough about that survey to determine whether residents who use and appreciate the parks support such hunts. I'd bet the percentage of park users approving a hunt would be substantially less than 70 percent.

All in all, the story gives an unbalanced and highly favorable spin to Edwards' push for a hunt. Here are some claims that I would challenge.

First, Edwards says "every time we have an event at Kincaid there's a moose in the way." That's ridiculous. It's the exception, not the rule, that moose require changes in an event or present a danger to participants; those circumstances tend to make it into the news precisely because they're unusual.

Yes, there are certain times of year when moose should be taken into special consideration by event organizers (and others): in late spring and early summer, when cows with newborn calves are especially vigilant and protective; and the autumn rutting season, when bulls especially are likely to be stressed and easily agitated.

Given all the information that's available about moose, local residents should know this and take extra precautions.

Though Sinnott refers to "troublemaker" moose, in fact human actions have largely contributed to the upswing of moose-human conflicts at Kincaid, whether in organized events or other, informal recreational activities. Two excellent examples are the "well publicized skirmishes" Sinnott recounts in his story. As I previously discussed in pieces published by Alaska Dispatch, ("The problem isn't agitated moose, it's people showing bad judgment," Oct. 3, 2013 and "Explosion of new trails at Kincaid is a big part of conflicts between moose and people," Oct. 28, 2013), people's poor decisions led directly to the shooting deaths of the two moose.

We are supposedly the more intelligent species, yet we sometimes behave in remarkably foolish, ignorant, or stubborn ways.

To repeat: the problem at Kincaid Park isn't trouble-making moose. The animals should *not* be hunted for public-safety reasons, Edwards' chief rationale for starting a hunt there. And if a persistently dangerous moose is identified, authorities should remove it, not sport hunters.

Sinnott's story also makes it clear that there's been no upsurge in moose at Kincaid. In fact, based on F&G studies, it's more likely moose numbers have dropped since the mid-1990s.

Nor is there any evidence that moose have become more aggressive. Based on my own experiences—I visit throughout the year—I'd wager Kincaid moose are as habituated to people as they've ever been, if not more



That's not to say individual moose won't sometimes become agitated and aggressive. A protective cow moose too closely or suddenly in early summer, an adrenalin-boosted bull moose in mating season that feels cornered—yes, they may attack a careless, unaware, or pushy person. But this is not new behavior, it's normal.

Edwards' blanket statement that cows are more dangerous than bulls—the reason he gives for proposing an antlerless moose hunt—is another dubious assertion.

Yes, cows are more dangerous for a period of time after they've given birth to calves. But bulls present a much greater danger in autumn, when Edwards proposes his hunt. My experience from late summer into winter is that cows, even those with calves, are remarkably tolerant of human (and even canine) passage, as long as a person or dog doesn't try to get too close or harass them.

I would also argue Edwards' point that bulls have "more intrinsic value" than cows. What's his expertise, to make such a judgment? Again, his opinion masquerades as fact.

Though neither the number nor behavior of moose has changed substantially, what *has* shifted at Kincaid is the human element. As Sinnott wrote, "Nowadays the park crawls with people most of the year."

Actually, "crawls" isn't the best word choice. Many of the people who recreate at Kincaid are moving fast: runners, soccer players, skiers, and especially cyclists. The explosion of single-track trails and those who use them are the single biggest change that's contributed to Kincaid's so-called moose "problem."

Those trails have greatly fragmented what remained of Kincaid's already diminished woodlands. Thus it's now harder for moose to avoid us humans and that in turn means more encounters. More conflicts.

Those who say we must have either a moose preserve or a moose hunt are creating a false choice. We can have both moose and human recreation. But people need to take more responsibility for their actions, they need to pay more attention to—and show tolerance for—our wildlife neighbors.

There's another important point to consider: Edwards says October is the best time to stage a hunt because the park attracts fewer people. That may have once been true, but not necessarily anymore, not with the abundance of cyclists drawn to the single-track trails during fall's "shoulder" season.

If allowed, an October hunt would displace a substantial number of people. Are the state and municipality really going to ban other recreational activities so that a few people can hunt moose despite no credible evidence that having such a hunt will eliminate moose-human conflicts? The only way to do that would be to kill all the moose. And who wants that?

In short, I can find no good reasons to break with long-standing policies and allow a hunt at Kincaid or any other municipal park. I hope the city holds firm on its prohibition of hunting and the discharge of firearms in local parks.

The presence of moose enlivens and enriches the visits of many locals drawn to Kincaid. Instead of killing them, why can't we humans behave more responsibly and respectfully, so that both species face less danger from each other?

So, to reiterate: I request the BOG to oppose and deny this proposed Kincaid moose hunt.



Submitted By
Michael Mandregan
Submitted On
2/9/2015 5:32:59 PM
Affiliation

Phone
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Address
5311 Emmanuel Avenue
Anchorage, Alaska 99508

Anchorage Area – Unit 14C

PROPOSAL 150 -5 AAC 85.045 Hunting seasons and bag limits for moose.

Dear Sir or Madam:

As an avid recreational and commuting cyclist who frequents the Kincaid Park I strongly advise against the legalization and introduction of a hunt at the Kincaid Park. Compassion for or lack-there-of for handicap accessibility for hunting is in my opinion irrelevant.

I agree there have in fact been an increase in human-moose encounters; however, the fault is due to the overdevelopment of the trail systems which severely reduced the moose population's ability to avoid humans contact.

In viewing a Kincaid Park trail system maps of 2002 and 2008 one finds little significant increase in development, but since 2009 thru the present it appears as many as seventeen (17) single-track mountain bike trails have been added, increasing the number of trail intersections by forty-three (43)! Reference the "Singletrack Advocates Organization" own Kincaid Park 2014 Map:

http://www.muni.org/Departments/parks/Documents/Kincaid_STA_Trail_map.pdf

The light blue lines largely represent the "legacy" trails as of 2008, prior to the proliferation of single-track trail development. All other colors represent new single track trails.

This over development in my opinion, though maybe well-intended, has proven reckless and play a significant role in the increased, sometimes dangerous human-moose encounters.

I suggest not only halting any new plans for further development, but also consideration for strategically abandoning/closing many of these new single-track mountain bike trails, giving the right-of-way and fair share of the natural habitat back to the moose population.

Thank you for your consideration on this important matter.

Michael Mandregan

Post-it® Fax Note	7671	Date	2.17.2015	# of pages	5
To	BOG Southcentral	From	CHUGACH STATE P		
Co./Dept.	ADFG	Co.	SUPERVISOR		
Phone #	(907) 465-4110	Phone #	(907) 345-5014		
Fax #	(907) 465-6094	Fax #	(907) 345-6982		

PC070
1 of 5

CHUGACH STATE PARK CITIZENS' ADVISORY BOARD

18620 Seward Hwy, Anchorage, AK 99516 Phone: 907-345-5014 Fax: 907-345-6982

Attn: Board of Game Comments
Alaska Department of Fish and Game
Board Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

February 10, 2015

Re: March 2015 Board of Game Proposals

I am writing on behalf of the Chugach State Park Citizens' Advisory Board regarding new southcentral and regional regulatory proposals that will affect Chugach State Park.

The Chugach State Park Citizens Advisory Board assists park staff in an advisory capacity with park management and development issues. As an advisory board, our decisions are guided by the five primary purposes established in creating the park:

- To protect and supply a satisfactory water supply for the use of the people;
- To provide recreational opportunities for the people by providing areas for specified uses and constructing the necessary facilities in those areas;
- To protect areas of unique and exceptional scenic value;
- To provide areas for the public display of local wildlife; and
- To protect the existing wilderness characteristics of the easterly interior area.

At approximately 495,000 acres, Chugach State Park is among the four largest state parks in the U.S. and comprises nearly half of Alaska's Game Management Unit (GMU) 14C. Most of the big game animals that inhabit GMU 14C use the park at least part of the year. The 15-member advisory board is appointed by the Director of State Parks and Outdoor Recreation. The board intentionally represents a wide variety of park users. With over 1.3 million visits to the park annually, we are interested in Board of Game regulation changes that may affect park resources and visitors.

We have carefully reviewed the spring 2015 Board of Game regulatory proposals that will affect the park's wildlife and users. The wildlife harvest and population estimates referenced in our comments are based upon input from the Alaska Department of Fish and Game. Our comments and recommendation for each proposal follow below. These recommendations passed unanimously during our February 9, 2015, meeting.

Proposal 148 – Support. This proposal would reauthorize all antlerless and either-sex moose hunts in GMU 14C except those in the Twentymile River drainage.

Most of the moose hunting opportunity in GMU 14C is in Chugach State Park. At least 18 (25%) of the 71 antlerless and either-sex permits offered in GMU 14C for the 2015-16 hunting season are in the park. In addition, many of the moose harvested in the remaining drawing permit hunts spend part of the year in the park. The only moose registration hunt in GMU 14C, which typically has 100-200 permittees, is in the park.



Most of the park is open for general season moose hunting for bulls with spike-fork and greater than 50-inch antlers or at least three brow tines on at least one side.

At its discretion the department has reduced the number of antlerless and either-sex permits issued in recent years because the population has been within the objective of 1,500-1,800 moose. However, when moose numbers begin to climb, antlerless and either-sex hunts will be needed to keep the population from exceeding its carrying capacity.

We support continuing to allow ADF&G to exercise its discretion in the management of antlerless moose in Chugach State Park and adjacent portions of GMU 14C.

Proposal 151 – Oppose. This proposal would change the “any sheep” bag limit to “any ram” for archery-only drawing hunts DS140, DS141, DS240, and DS241.

These hunts (85 permits in 2015) are located almost entirely in Chugach State Park.

On average, less than one ewe per year was harvested from these hunts in the past decade (2005-2014). Dall sheep populations in southcentral Alaska are limited more by adverse winter weather than by hunting. A small harvest of ewes is not likely to have any impact on sheep populations.

Contrary to what the proposal claimed, the Dall sheep population appears to be increasing in GMU 14C. From 2008 to 2014 the count increased from a low of 904 sheep to 1062 sheep, a 17% increase in six years. Although there is no biological need to harvest ewes in GMU 14C at this time, high populations in previous decades suggest that Dall sheep populations can exceed carrying capacity in the Chugach Mountains. Counts of 2,200-2,600 sheep in the late 1990s and early 2000s represented a population almost certainly exceeding the carrying capacity of its winter range. As Dall sheep numbers recover there may soon come a time when a limited ewe harvest may again be necessary to prevent overpopulation and damage to prime winter range.

An added benefit of the “any sheep” bag limit is that it allows a hunter to avoid a penalty for taking a ewe if one is shot by mistake while attempting to harvest a young ram.

Proposal 152 – Oppose. This proposal would allocate all but one of the Dall sheep permits in GMU 14C to residents. The single exception would be the Governor’s tag.

Most of these permits are in Chugach State Park. This is an allocation issue that is within the Board’s purview. However, we note that Chugach State Park has some of the largest rams in Alaska, and both resident and nonresident hunters value these animals highly.

Other than Dall sheep and several antlerless moose hunts, no other park regulations restrict the proportions of residents or nonresidents in Chugach State Park. Our board promotes the value of the park to attract outside visitors to the area. Continuing to allow nonresidents to hunt sheep in the park is consistent with this goal. We prefer the status quo.

Proposal 153 – Oppose. This proposal would limit the number of next-of-kin nonresident Dall sheep permits issued in GMU 14C.

Most of these permits are in Chugach State Park. The Board of Game has capped the number of nonresident Dall sheep permits in GMU 14C. Proposal 153 seeks to allocate more of those permits to hunting guides rather than allowing Alaskans to guide their next of kin on these hunts.



Clients of hunting guides tend to be much more successful than resident hunters or nonresident hunters accompanied by next-of-kin residents. If this proposal is adopted it will take hunting opportunity away from residents and their nonresident next-of-kin and would likely result in fewer permits being issued to accommodate the increased harvest from guided hunters.

Proposal 154 – Oppose. This proposal would increase the number of nonresident mountain goat drawing permits in GMU 14C by adding one nonresident permit for each of the following hunt areas: DG852 (East Eklutna), DG854 (Eagle River), and DG858 (Bird Creek).

Contrary to what is stated in the proposal, these three hunt areas are not “very inaccessible” to the average permit holder. They are popular among local resident goat hunters. Nonresidents may also apply for these hunts; however, they are in a minority. Very few permits (3-5) are issued each year for each of these hunts. Typically, one or two goats are harvested from each hunt area. Because nonresident goat hunters must be guided and guided hunters are more successful than residents without guides, adding a separate nonresident permit to each area would increase the harvest. This would necessitate reducing the number of resident permits significantly.

Other than Dall sheep and several antlerless moose hunts, no other regulations restrict the proportions of residents or nonresidents in Chugach State Park. We prefer the status quo.

Proposal 184 – Oppose. This proposal would open resident Dall sheep hunting seasons a week earlier (August 3) than nonresident seasons (August 10) throughout southcentral Alaska.

Chugach State Park supports a significant number of the Dall sheep hunts in southcentral Alaska. The park is heavily used by the public in early August. Opening the season a week earlier than in the past would significantly reduce sheep viewing opportunities for the majority of park users. Sheep hunting permits in Chugach State Park are distributed spatially and temporarily to maximize the hunting experience. Thus, the reasons given for the earlier season (overcrowding, lack of opportunity, stressed rams) that might result in a diminished hunting experience are minimized or avoided in Chugach State Park. We see no good reason to adopt this proposal in Chugach State Park.

Proposal 185 – Oppose. This proposal would open resident Dall sheep hunting seasons a week earlier (August 3) than nonresident seasons (August 10) in GMUs 7, 14, and 15 and close both resident and nonresident sheep seasons on September 20.

Same rationale as Proposal 184. In addition, this proposal would eliminate many drawing sheep hunts in GMU 14C that open or close later than September 20. We see no good reason to adopt this proposal in Chugach State Park.

Proposal 186 – Oppose. This proposal would limit nonresident Dall sheep hunting in the southcentral region with shorter seasons, drawing permits, or other methods.

Chugach State Park supports a significant number of the Dall sheep hunting opportunities in the southcentral region. All sheep hunts in the park are by drawing permit only. Nonresident permits are already capped. Seasons for each hunt are short to allow two to three consecutive hunts with firearms and a follow-up hunt by archery only in most areas. We see no good reason to adopt this proposal in Chugach State Park.

Proposal 187 – Oppose. This proposal would allow a maximum of 10% of nonresident sheep hunt participation for the southcentral region.



Chugach State Park supports a significant number of the Dall sheep hunting opportunities in the southcentral region. All sheep hunts in the park are by drawing permit only. Nonresident permits are already capped at 13% for firearm hunts and 5% for archery-only hunts. This proposal would double the number of nonresident permits for bowhunters, which is probably not the sponsor's intent. It would reduce the allocation of nonresident drawing permits in the park from 13% to 10%; however, this would have no practical effect on the number of nonresident permits if the current strategy is used to distribute the permits fairly among the various hunt areas and seasons.

If the current allocation strategy is used, even in those hunts where the most permits are issued, in the Southwest portion of GMU 14C (with three consecutive hunts where 7 resident and 1 nonresident permits are issued), allocating 10% of the permits would still be 1 nonresident permit for each hunt area/season.

There are no hunt areas/seasons in GMU 14C with 10 or more total permits where firearms are allowed. Therefore, if the Board adopts a strict 10% cap for nonresident sheep permits, the allocation strategy will need to be changed. If nonresidents are going to be allowed an opportunity to hunt in every hunt area and season, nonresident permits will need to be selected at random from the total number of permits issued in GMU 14C. There won't be enough nonresident permits issued each year to distribute participants among every hunt area/season.

Other than Dall sheep and several antlerless moose hunts, no other regulations restrict the proportions of residents or nonresidents in Chugach State Park. We prefer the status quo.

Proposal 188 – Oppose. This proposal would allow a maximum of 10% of nonresident sheep hunt participation for GMUs 7, 14 and 15.

Same rationale as Proposal 187.

Proposal 189 – Oppose. This proposal would allow a maximum of 10% of nonresident sheep hunt participation in the southcentral region. Once drawn, residents and nonresidents cannot apply again for that specific drawing permit.

Same rationale as Proposal 187.

Proposal 190 – Oppose. This proposal would allow a maximum of 10% of nonresident sheep hunt participation in the southcentral region. It also proposes to limit the number of hunters transported by air charters, which is not in the Board's authority.

Same rationale as Proposal 187.

Proposal 194 – Oppose. This proposal would prohibit the use of hunting dogs for taking upland game birds after October 31 in the southcentral region. The intent of the proposal is to avoid catching hunting dogs in lawful traps.

Chugach State Park provides some of the best opportunities for hunting upland game birds in GMU 14C. Bird dogs help retrieve lost and wounded birds. Retrievers are an important tool in ethical hunting.

Most of the dogs caught in legal traps in Chugach State Park are not hunting dogs. They are accompanying hikers, bikers, skiers or runners and are often caught near hiking trails. While we appreciate the concern expressed for hunting dogs in this proposal, we wonder if the next step will be a proposal to prohibit other off-leash dogs in Chugach State Park.



Currently, dogs are allowed to be off leash anywhere in the park except within ¼ mile of facilities and trailheads. We do not support the prohibition on the use of dogs for hunting upland game birds.

Proposal 196 – Oppose. This proposal would add five days to all resident hunting seasons and allocate 75% of the drawing permits to residents for the southcentral region.

Chugach State Park provides most of the Dall sheep hunting opportunities in GMU 14C. This proposal would increase the proportion of permits allocated to nonresidents from 13% in sheep hunts where rifles are allowed and 5% in archery-only sheep hunts to 25% nonresidents.

Chugach State Park provides nearly half of the moose hunting opportunity in GMU 14C, and more than half of all the Eklutna Valley registration hunt permittees are included in the total. All antlerless moose hunts outside of Joint Base Elmendorf-Richardson are currently for residents only. This proposal would allocate 25% of those permits to nonresidents.

Hunting opportunities are relatively scarce in Anchorage, compared to the large number of hunters living in the community, and most of the Dall sheep, mountain goat, moose, and brown bear hunts are drawing hunts. Allocating 25% of all drawing permits to nonresidents will significantly decrease local hunting opportunities. We prefer the status quo.

Thank you for the opportunity to respond to the regulatory proposals submitted for the spring 2015 Board of Game meeting. Please let me know if you have any questions regarding these comments and recommendations. I can be reached at 907-688-9078. Thank you for your consideration.

Sincerely,

Rick Sinnott

Rick Sinnott
Chair

cc: Jessy Coltrane, ADF&G



NORTHWAY VILLAGE COUNCIL
BOX 516
NORTHWAY, ALASKA 99764

Shawn Bayless, Refuge Manager
Tetlin National Wildlife Refuge
P. O. Box 89
Tok, AK 99780

Dear Shawn,

We received your letter dated February 2, 2015 regarding the possible changes to Federal Regulations on Alaska National Wildlife Refuges and Invitation for Continuing Government to Government Consultation.

Thank-you for reaching out to us for our comments. At our November 25, 2014 meeting we discussed these issues with you. As we spoke at the meeting we are deeply concerned to what the service is doing. Northway hunts on the refuge lands that were created in 1980. We have hunted on the lands long before it was a refuge. We count on the moose that we harvest on those lands for our basic survival. In recent years since the refuge was created, we have noticed the decline in the moose populations. We now hear wolves when we are hunting where we never heard wolves before. We see lots of wolf sign that we never seen before. We see many more bears and bear sign that we never seen before. We are seeing far less moose, which has been our food source for countless years. Bears and wolves are affecting our moose populations.

We have looked at the revised proposed regulations and at this time are still in opposition of all proposed changes. We have a good working relationship with the state managers. We do not want to lose the state tools in the toolbox to the FWS or the NPS. We have seen in the past when these two agencies work together to shut down state regulations. We are opposed to these procedures by both agencies. Currently GMU 12 we can harvest a grizzly over black bear bait. We know hunters who do this and we support this method of take. We, too, may be participating in more of this in the future due to the over abundance of bears.

We do NOT support this proposed regulation to close wolf and coyote seasons already open by the state. We support the taking of a wolf or coyote during the entire year. It is odd that the lower-48 classifies coyotes as vermin and allows the taking of coyotes year round even with planes and helicopters. Why are coyotes not considered vermin in Alaska? Coyotes were few and far between or non-existent decades ago. Many trappers & hunters never saw coyotes until recent years. They seemed to have moved in more recently. They should be considered vermin in Alaska, too.

As we look over your proposed changes, all we see is the government manipulating words to say what you want them to say. Your word "to clarify existing Federal Mandates for conserving..." is just a bunch of garble goop to justify the special interest groups that live outside Alaska.

Looking back to March 2011 on Unimak Island Caribou Herd EA, the Regional Director stated:
"In addition, by selection of the No Action Alternative, the Service does not reject the



use of predator control as a valid wildlife management tool in support of s...
when appropriate."


What has changed? These statements are conflicting. Is the USFWS officially rejecting the use of predator control as a valid wildlife management tool now for subsistence? Will the needs of people for food be superseded by anti-consumptive use philosophies that value wolves more than people?

This January 2015 notice repeatedly states that the proposed USFWS regulations will not affect subsistence use when conducted under federal subsistence regulations, but this is just words & simply not true. Government people in their government offices have no idea how these types of things affect us in the real world now and in the future. We have seen how it works in the past. Once something goes in the federal register, we never get it back. That is the reality. Another reality is that we hunt mostly under state regulations. Differing regulations like these will take a lawyer and land surveyor to understand. Common folk cannot be expected to sift through all these differing regulations and understand them.

This "natural diversity, biological integrity, and environmental health on refuges in Alaska in relation to predator harvest" statement is really hypocritical. This contrived proposed regulation changes would shift the concern of natural diversity, biological integrity, and environmental health to the detriment of our moose populations. It appears to us that the service is favoring predators over other species. We are in opposition of the addition of this language. We can argue what you are proposing is the manipulating wildlife for the benefit of the predators. This is the total reverse for what we advocate for wildlife populations. These types of regulations manipulate predators to keep ungulates at low levels. We oppose any changes in the closure procedures except we would approve of the addition that would require consultation with the state and affected Tribes and Native Corporations, as well as public comment.

We feel that public input from Alaskan residents is not given the same weight as outside special interests, as it appears the FWS is on a mission along with the NPS. We urge you to stop these senseless proposed changes and work closely with the state managers.

Sincerely,


Howard Sam and Nichol Rallo

Cc Lorraine and Lee Titus
Cc Eastern Interior Regional Advisory Council
Tok Fish & Game
Board of Game
Alaska Federation of Natives
ANSCA Corporations
National Wildlife Refuge System, Alaska Region
Barbara Cellarious- National Park Service



Submitted By
Julie Sadoris
Submitted On
2/12/2015 2:06:56 PM
Affiliation

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I ride my bike on the single track in Kincaid as well as on the Tony Knowles Coastal Trail year-round. I have also skiied and walked on the Kincaid trails. I have never had a negative encounter with any moose or wildlife while recreating in these areas. Seeing moose along the way is part of the enjoyment of being in Kincaid Park as well as the City of Anchorage. Removing moose will take away from this experience and devalue the park. For the most part, the moose have become accustom to people. Obviously there are times when extra caution is to be heeded, spring calving and the fall rut. The number of negative moose/human interactions is probably pretty low considering the number of people using the park. I believe education is a better way to prevent or deal with human/moose interactions rather than permanently removing the moose. If we removed everything that posed a danger to our lives, the world would be a pretty bland and boring place. Please allow us to continue enjoying the moose in Kincaid Park, please do not allow the moose hunt.

Submitted By
Debrah Carlson
Submitted On
2/17/2015 4:50:34 PM
Affiliation

Proposal 180



PC073
1 of 1

I support proposal 180 in Cooper Landing, AK. There have been numerous and tragic incidents involving traps too close to neighborhoods and trails where dogs have been severely wounded. I believe in traps being tagged or somehow identified and that set backs be agreed upon and trapping areas far from trails, driveways, schools, parking lots, campgrounds and residential communities.



Submitted By
Tom McReynolds
Submitted On
2/17/2015 5:49:48 PM
Affiliation

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P.O. Box 536
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I support proposal 180



Submitted By
Kent Bowman
Submitted On
2/17/2015 6:28:33 PM
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Bowmans' Bearcreek Lodge Hope Alaska

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Mile 16 Hope Highway
Hope, Alaska 99605

I support BOG Proposition 180 in regulating trapping setbacks and exclusions in the Cooper Landing areas and along the Resurrection Trail to Hope. We frequent Cooper Landing, Russian River Trail, Kenai Lake, and Tern Lake enjoying outdoor activities with our young grandchildren and our dog. We have heard first hand accounts of our friends and neighbors' horrifying accounts of trapped and injured pets, and of pets killed by traps due to careless trap placement, poor or no trap warning markers, and outright lazy trapping methods employed by trappers in these areas. Our lodge hosts many people both Alaskans and out of state visitors who use the Resurrection Trail during the winter months, and most have dogs with them as they sled, ski, or snowshoe the trail. We feel that enforceable common sense setback regulations are appropriate and necessary to insure our safety and that of our guests. Kent Bowman

Submitted By
JD Batove
Submitted On
2/13/2015 11:57:57 AM
Affiliation



PC076
1 of 1

Hunt Proposal #150

As a regular visitor to Kincaid park who has all too frequent encounters with the park's moose, it is my opinion that serious consideration should be given to support of the proposed moose hunt. While I enjoy being among the wildlife that Alaska has to offer, no where else in Alaska have I encountered moose that are so unnaturally habituated to humans. If incidents such as those that have been in the news over the last few years are any indication, it's only a matter of time before someone is seriously injured or killed. A balanced moose population, on par with more remote areas of the state, is certainly one step forward towards a safer park for all park users. Please join me in support of this proposal and thanks for your consideration on this matter.

Sincerely,

JDBatove



Submitted By
Ken Green
Submitted On
2/13/2015 8:59:19 PM
Affiliation
Mr.

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9075951643

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kennkay@arctic.net

Address
PO Box 776
Cooper Landing, Alaska 99572

I do not support Al Barrette's proposal to prohibit the use of hunting dogs for the taking of upland game birds in order to avoid them getting caught in legal traps. This proposal favours trapping over hunting thereby giving the priority of use of public lands to one user group over another without a viable reason why this should be. When traps are set legally then dogs should be under control.

The real question this proposal opens up seems to be an issue of the legality of trap setting and boundaries. That would lead to the question of priority of use and to whether or not the issue of trap setting conflicting with dog hunting can be worked out with the Alaska Trapper's Association, Hunting interests and Wildlife authorities like it should be rather than simply prohibiting the use of hunting dogs. In this vein, it would be equally justifiable to pass a proposal prohibiting trapping where hunting dogs are being used.

The conflicts of trapping with other uses is a topic that has historically been very difficult to deal with, however, I disagree with banning one use to favour another - unless special areas are established to separate the uses.



Submitted By
Kay
Submitted On
2/14/2015 8:07:23 AM
Affiliation

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Thomas

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Cooper Landing, Alaska 99572-0776

I am against Al Barrette's proposal 194 to prohibit the use of hunting dogs for the taking of upland game birds in order to avoid them getting caught in legal traps. A proposal of this kind gives priority to trappers over hunters and in doing so gives priority of use of public lands to one user group over another without a viable reason why this should be. Dogs should be under voice control or on leash during trapping season and all traps should be set in legally approved areas.

My concern is that there needs to be clearly established areas where trapping is allowed as well as areas where trapping is prohibited. This would ease what seems to be increasing conflict between trappers and non-trappers in areas that are designated multi-use. As Southcentral becomes more urban and suburban, there are more user groups asking for areas to be set aside for non-trapping. This is not to say any group is pushing to eliminate trapping state-wide.

The conflicts of trapping with other uses is a topic that has historically been very difficult to deal with, however, I disagree with banning one use to favour another - unless special areas are established to separate the uses.

I fully support Proposal 180 for the Cooper Landing Area and also the proposal submitted by Moose Pass to set aside areas that are designated not for trapping

Thank you for your consideration.



Submitted By
Cherie Northon
Submitted On
2/16/2015 2:10:16 PM
Affiliation
Dr.

Phone
907 562-2496

Email
cheries@mapmakers.com

Address
P.O. Box 230329
Anchorage, Alaska 99523

I am utterly opposed to the thought of hunting in Kincaid Park. The conditions proposed are absurd, it would be dangerous for all who enjoy the area, and park users need to learn to live with wildlife rather than killing everything. Common sense allows many people to co-exist in potentially dangerous situations. Schedule events when it's not rutting season, make yourself aware of new moose moms and their babies. It's like the bicycle event along Campbell Creek when the salmon were running. Where there is salmon, there are probably bears. Come on, people. Many of us are nature lovers and want it in its place for viewing. There are a variety of recreation activities--not just extreme sports.

Submitted By
Susan Serna
Submitted On
2/16/2015 3:51:29 PM
Affiliation



PC080
1 of 1

I'm commenting on the proposed moose hunt in Kincaid Park. As a long-time and frequent user of the park, I can't think of a more ridiculous idea than opening up the park to a hunt. Besides the fact that this could be incredibly dangerous, there is no need to cull the numbers of moose in the park. People need to be more mindful of and look out for the wildlife while using the park. If people would use some common sense (keeping dogs on leashes, riding bikes at high rates of speed, etc.), there wouldn't be dangerous people/moose encounters. As an artist and photographer, one of the main reasons I visit Kincaid is to view the moose and other wildlife. Please keep the park wild and don't open it up for a moose hunt. Thank you.

Submitted By
Gordon Jones
Submitted On
2/16/2015 5:14:19 PM
Affiliation



PC081
1 of 1

Board of Game,

As a frequent visitor to Kincaid Park, I see no need for a moose hunt. My children participate in high school ski races in the winter. Occasionally a moose appears at an inconvenient location but the moose move on. This an acceptable aspect of living here in Alaska. When recent visitors from New York wanted to see a moose (an exotic sighting for them), I thought of Kincaid Park as likely location to view moose. Moose in the park are a good thing, not a problem.

Please table this proposal.

regards,

Gordon Jones, Anchorage



Submitted By
Renee Blake
Submitted On
2/16/2015 6:12:17 PM
Affiliation
resident, former park user

Phone
907-357-5596
Email
RSBatJCSE@aol.com
Address
3785 E Serendipity Loop
Wasilla, Alaska 99654

Proposal No. 150, Kincaid moose hunt proposal, Unit 14C section, BOG March 13-17 meeting at the UAA Student Union

I don't know if the board meeting I selected above is correct (Southcentral Region, 2/27/15), but it was the only one for the BOG. According to the ADN article on January 8, the BOG meeting is March 13-17.

OPPOSE proposal

I agree with Bill Sherwonit's commentary dated January 8, 2015. My reasons for opposition:

1. There is not enough evidence from the 2010 survey to show which residents supported the hunt; I don't think due process was given to park users.
2. There is not enough evidence to support "problem moose" as rationale, and dangerous moose should be handled by the authorities. According to Bill Sinnott and the AK Dept of Fish & Game, there has not been a population increase of moose in the park.
3. Using youth groups as justification (because we don't want to hurt the kids!) is ridiculous. These young skiers and bikers are highly intelligent, and should already be educated and experienced in moose behavior. If not, they should not be on the trails until they receive training.
4. With the additional trails people should be more vigilant about wildlife as well as other humans, especially on the twisting, turning, fast-moving single track trails. Perhaps more warning signs on the more dangerous trails at the trailheads?
5. Most people who go to Kincaid enjoy the wildlife experience. I know I did. Kincaid was my saving grace for 6 years before and after work while stationed at Kulis ANGB. The running, biking, and skiing there are incredible. I could not tell you how many moose encounters I had (too many to count), but using the simple rules I used from reading the signs at the trailheads I never had a bad experience - that includes encountering a mama moose with her ears back and a rutting male who snorted at me. Staying alert and getting out of the danger zone quickly and calmly kept me out of trouble.

Thank you for the opportunity to present my comments.

Sincerely,

Renee Blake



Submitted By
john
Submitted On
2/20/2015 1:46:42 PM
Affiliation

Board of Game Central/Southwest or South Central Region Meeting.

February 19th, 2015

Written Public Comment Submission:

Conclusion and Summary of Proposals as a Whole:

John Kaiser

Dear Board Members,

After review of the many proposals I would like to add my comments as a final summary for consideration and acceptance.

It is very clear that the Board **must** take drastic measures STATE WIDE to ensure a healthy and sustainable population of harvestable Dall Sheep for the citizens of and in the State of Alaska.

In order to do this the Board **shall** enact regulations STATE WIDE that will both; allow for the citizens of the State of Alaska to hunt prior to any opening for NON-Residence Big Game Trophy Hunters, and shorten the length of the season for NON-Resident Individual, who intrinsically harvest the higher percentage of legal sheep.

This is best fair practice move option before the ongoing collapse of the Sheep population becomes so bad that the season will be shut down all together for everyone as did happen in the Brooks. We have to look to the future and the future of our next generation of hunters.

This is also a preemptive move on the Boards part before legislation is passed to, " Allow Citizens/Resident Alaskan to Hunt 10 days prior to the opening of Non-Resident hunters for all Big Game." This is allowable under the State Constitution and is not an infringement on management tools deferred only to the Alaska Department of Fish and Game.

The only logical and smart move for the Board Members to do is shorten the season for Non-Resident as proposed by a majority of submitted proposals:

Non-Resident Season Shortened Seven (7) days.

Resident	Non-Resident
Aug 10th – Sept. 20th	Aug 17th – Sept. 20th

Thank You,

John Kaiser

"Learn from the Passenger Pigeons that once numbered in the Billions. Don't wait until it's too late."



Submitted By
Keith Brownsberger
Submitted On
2/17/2015 11:32:53 PM
Affiliation
Cabin Owner

Phone
907-277-5497

Email
kmberger@gci.net

Address
3036 Madison Way, Anchorage, AK 99508-4417
19530 Rusty's Way, Cooper Landing, AK 99572
Cooper Landing and Anchorage, Alaska 99572

We have owned a cabin in Cooper Landing since 1979. We spend a lot of time there in the spring, summer, and fall. Our 15 grandchildren visit us often when we stay at the cabin. The grandchildren love to run and play games in the woods behind our cabin. They have been warned to look out for traps, but they are not always careful. One of these years I fear they will be injured by a trap. Therefore: I support Proposal #180 " Not on Our Doorstep" Keith M. Brownsberger, MD



Submitted By
Colin Lindsey
Submitted On
2/18/2015 8:22:55 PM
Affiliation

Phone
9077175098
Email
c.s.lindsey24@gmail.com
Address
3864 Caravelle Drive
Anchorage, Alaska 99502

Hello, my name is Colin Lindsey. My comment is regarding the clean-list regulation, 5 AAC 92.029 - Permit for possessing live game. No official proposal has been sent in for the 2016 deliberations to ammend this regulation, and so I cannot include a proposal number here. I hope that I can ask a pertinent question though. In the interest of brevity, the clean-list does not currently include any venemous reptiles.

If I understand correctly, to be considered for the clean-list a species must not be able to survive in Alaska in the wild, it must not be able to alter the genetics of an indigenous species, or interbreed, it must not be a significant danger to an indigenous species through predation or competition, it must not carry the risk of disease to indigenous species, and it must not pose any other foreseeable danger to any wildlife within the state of Alaska. I know that all non-venemous reptiles are on the clean-list. My question is why venemous reptiles were left off. I'm sure there are exceptions at universities for research and scientific endeavors, but regular people cannot keep a venemous reptile.

As far as I am aware, no reptile could survive in Alaska in the wild. Reptiles are ectothermic and the winters would kill them. There are no reptiles indigenous to Alaska for any reptile to interbreed with, except possibly a few Common Garter Snakes (*Thamnophis sirtalis*) which may wander in from Canada occasionally in the summers, and these are certainly too distant evolutionarily to interbreed with any venemous reptile. Without any indigenous reptiles, the possibility of disease and pathogens carrying over to an Alaskan wildlife species is remote to impossible. And because they would never survive in Alaska, a reptile, venemous or otherwise, would never be able to pose a danger of any sort to a native species.

I am not suggesting that we fill up the state with cobras. I am only wondering why they are absolutely off limits. Was the concern a danger to humans, rather than one of the regulation criteria? Again, I am not suggesting radical changes, but it is a fact that dog bites cause many times more problems in the US than poisonous reptiles, but Alaska is proudly one of the most dog-friendly states in the country. With moose walking down city streets, grizzlies on the fringes of most towns, and wildlife everywhere, most Alaskans tend to face dangerous animals as a fact of life. I think that the growing trend of reptile enthusiasts would appreciate being able to keep poisonous reptiles, just as the one-humped camel enthusiasts are allowed to see to their hobby without legal complications.

Perhaps before May 1st I will submit a proposal to the Board of Game for deliberation in 2016. I am a student, and the process looks rather intensive, but perhaps I will. Thank you for your time,

Colin Lindsey



Submitted By
Bryan Judge
Submitted On
2/17/2015 3:50:22 PM
Affiliation

Phone
616-745-1187

Email
bryanjudge@hotmail.com

Address
1629 Lookout Farm Drive
Ada, Michigan 49301

Members of the Board of Game,

As a resident of Michigan I have been fortunate to hunt in the mountains of Alaska three times now (twice in GMU 19C and once in GMU 15C). For some, it is a once in a lifetime opportunity. It has come to my attention that hunting for Dall sheep for nonresidents may switch to a draw only system. The reasons for this switch may be multiple, but my primary understanding is that Alaskan residents feel that nonresident hunters are lessening their chances of harvesting a Dall sheep. In the 30 days that I have spent hunting in your great State, I have never once encountered a resident hunter afield. While I support responsible, resource-based management of natural resources, and am all for keeping Dall sheep on the mountains, I do not support a nonresident draw only system for Dall sheep (Proposals #110-118). I think it is only fair that opportunities to pursue a Dall sheep in the mountains of Alaska be open to both resident and nonresident hunters alike.

Please contact me if you should have any questions or concerns.

Respectfully,

Bryan S. Judge
1629 Lookout Farm Drive
Ada, MI
49301

Submitted By
Marybeth holleman
Submitted On
2/17/2015 1:24:15 PM
Affiliation



PC087
1 of 1

I oppose proposal 160. A moose hunt of any kind in Kincaid is not necessary for controlling moose and is a recipe for a public safety disaster.



Submitted By
Thomas Eley
Submitted On
2/17/2015 11:45:19 AM
Affiliation

Phone
9075622496

Email
thom@mapmakers.com

Address
4611 Pavalof ST.
Anchorage, Alaska 99507

There does not need to be a moose hunt in Kincaid Park. The problem is not the moose but the people using the park. Thomas Eley



Mayor Dan Sullivan

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



February 11, 2015

Subject: Proposed Hunting in Kincaid Park, Southcentral Region Meeting, March 2015,
Proposal 150, Anchorage Area, Unit 14C

Dear Mr. Spraker:

The Municipality of Anchorage opposes the proposal for hunting in Kincaid Park (Proposal 150, Anchorage Area, Unit 14C). The Municipality opposes hunting in municipal parks for reasons of safety for park users, and conservation of natural resources consistent with such public use.

Additionally, the Municipality would not authorize use of motorized vehicles to facilitate hunting in municipal parks. Motorized vehicles are generally incompatible with visitor safety, potentially damaging to trails or sensitive areas, and maintaining the condition and character of municipal parks.

In sum, neither hunting nor additional use of motorized vehicles in Anchorage's parks are consistent with the mission, goals, and objectives in management of the municipal park system.

The Alaska Department of Fish and Game maintains authority and responsibility to manage wildlife resources within the Municipality, and in particular, the Department's ability to respond as needed when circumstances dictate. The Municipality supports ADF&G staff, under their direction and control, in responding to reports of sick or injured animals, or animal behavior that seems threatening or otherwise unusual.

We appreciate the Board's consideration of the Municipality's concerns on behalf Anchorage's resident and visiting park users.

Sincerely,

A handwritten signature in blue ink that reads "John H. Rodda".

John H. Rodda, Director
Parks and Recreation Department

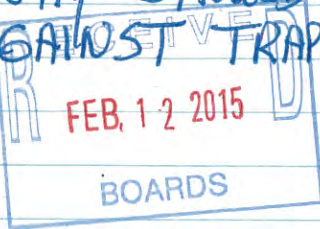
cc: George J. Vakalis, Municipal Manager
Holly Spoth-Torres, Park Superintendent
Brad Cooke, Kincaid Recreation Supervisor
Jessy Coltrane, Ph.D., Area Wildlife Biologist, ADF&G
Gino DelFrate, Region 2 Management Coordinator, ADF&G

2. Tom Honer - I am an Alaskan



PC090
1 of 3

WHY SHOULD THERE ALWAYS BE PROPOSALS AGAINST TRAPPING, WHEN TRAPPERS HAVEN'T CHANGED?



MOST PRESENT-DAY TRAPPERS ARE FROM THE 1970's, 80's, 90's GENERATION. WE DEFINATELY LIKE TO SEE AND HELP THE YOUNGER GENERATION GET INVOLVED IN TRAPPING IN THE OUTDOORS. WE NEED TRAILS TO WALK ON. I'm 60 YEARS OLD AND SO ARE MOST OF PRESENT-DAY TRAPPERS. MY LEGS ARE GETTING WORSE, BUT I (WE) STILL CARRY A LOT OF WEIGHT. IT'S HARD AND WE WORK AT IT AND TRY TO COVER AS MUCH GROUND AS WE CAN OR HAVE TIME TO. WE ONLY TRAP AROUND FOUR MONTHS OUT OF THE YEAR.

NOBODY IS BEING DENIED THE USE OF ANY TRAIL. PRACTICALLY ALL TRAILS AND RURAL BUSH ROADS WERE MADE LOGGERS, MINERS, OIL COMPANIES, HUNTERS, TRAPPERS, AND THE STATE (FOR PUBLIC USE). AND THOSE CERTAIN GROUPS ARE AGAINST ALL OF THOSE ACTIVITIES. MOST OF THE PEOPLE COMPLAINING NEVER LEAVE THE TRAIL AND THEY THINK THEY HAVE THE ONLY RIGHTS TO IT. THEY WON'T HIKE OR SKI UNLESS SOMEONE PAVES THEM A TRAIL, WHICH I HAVE DONE ON SNOWSHOES, MOST ALL OF THEM ARE IN A LOT BETTER SHAPE THAN US. PEOPLE WILL LEAVE THE TRAIL ONLY TO FOLLOW OUR TRACKS TO SEE WHAT WE ARE DOING. MOST OF THEM KNOW. A LOT OF THEM WILL DESTROY THE SET, IF THEY FIND IT. SOME EITHER STEAL THE TRAP OR PULL IT AND THEN THROW IT TO WHERE YOU CAN'T FIND IT. AND OTHERS TAKE THE ANIMAL. EVEN WHEN PEOPLE OPPOSE ISSUES IN THE WORLD, DOESN'T MEAN THE ACTIVITIES ARE WRONG.



2.

THERE VIRTUALLY AREN'T ANY ISSUES TO WARRANT THEIR PROPOSALS. IT JUST COMES DOWN TO THAT THEY ARE ANTI-TRAPPERS. THEY ARE AGAINST ANY TYPE OF HUNTING. SOME PEOPLE ARE AGAINST THINGS JUST BECAUSE THEY DON'T DO THEM. MANY PEOPLE AREN'T EVEN INVOLVED IN ANY OF THE ISSUES, BUT ARE TALKED INTO JOINING GROUPS JUST TO BOOST NUMBERS TO SHOW HUGE OPPOSITION. PEOPLE ARE MORE AND MORE AGAINST PRACTICALLY EVERYTHING OUR GRANDFATHERS DID. ALL OF OUR GRANDFATHERS AND GRANDMOTHERS BUILT AMERICA, AND A LOT OF PEOPLE WANT TO FOLLOW THE TRADITION IN THEIR FOOTSTEPS.

SOME PEOPLE ARE USING DOGS AS A MEANS TO USE AGAINST TRAPPERS. VERY FEW DOGS ARE IN A VOICE-ACTIVATED CONTROL WHEN UNDER ANY KIND OF A STRESSFUL SITUATION, WHETHER IT BE ANIMALS OR HUMANS. EVEN DOMESTICATED ANIMALS, CONSIDERED TAME, STILL HAVE WILD INSTINCTS. THEY ARE NOT IN YOUR CONTROL IF UNLEASHED. DOGS ARE PETS, BEING A TOTAL RESPONSIBILITY OF THE ACCOMPANYING PERSON, TO WHERE THEY'RE NOT DISTURBING PEOPLE, AND THEIR BELONGINGS, AND WILDLIFE. THAT'S WHY THEY HAVE LEASH LAWS. IF DOGS ARE CONSIDERED BY SOME PEOPLE AS USERS, THEN THEY HAVE TO BE REGULATED.



3.

WE CAN ALL WALK ON AND USE THE TRAILS WITHOUT INTERFERING WITH EACH OTHER. I POSTED SIGNS ON TRAILS TO KEEP DOGS ON LEASH, ALL OF THEM WERE RIPPED OFF EVEN WHEN I CONTINUED TO REPLACE THEM. I'VE NOTICED NO DIFFERENCE OF PEOPLE OR DOGS TAMPERING WITH SETS NEAR THE TRAIL OR A WAYS OFF. I SPEND MORE TIME DISGUISEING MY SETS FROM PEOPLE THAN I DO FOR THE ANIMALS I'M TARGETING. LEASH LAWS ARE MADE FOR A REASON, OR THEY WOULDN'T HAVE THEM AT ALL. PETS ARE SUPPOSE TO BE YOUR FRIENDS. YOU SHOULDN'T LET THEM GET OUT OF YOUR SIGHT OR REACH. PEOPLE ARE THE REAL ISSUE NOT DOGS. THERE ARE VERY FEW CASES OF DOGS GETTING IN TRAPS. AND PRACTICALLY NONE THAT ARE FATAL.

50 PEOPLE WILL COMPLAIN, AND YET YOU'LL JUST SEE A FEW ALL WINTER, AND HARDLY EVER THE SAME PEOPLE, FOR ONLY 2-4 MONTHS OUT OF THE YEAR, TRAPPERS ARE THE BIGGEST USERS. WHEN IT'S -20° , BLOWING SNOW, RAINING, OR SUNSHINE, TRAPPERS ARE OUT THERE. YOU'LL VIRTUALLY NEVER SEE ANYONE ELSE, UNLESS EVERYTHING IS JUST THEIR WAY.

TOM HOWER
SOLDOTNA, ALASKA
OVER 40 YEARS A TRAPPER

252-3612



From: [Laura Sneddon](#)
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Proposals 170, 180, 181, & 150
Date: Tuesday, February 24, 2015 10:40:06 PM

Dear Alaska Board of Game,

I am writing you to support the following positions on proposed bills.

I SUPPORT proposal 170 for the following reasons:

- The 2013 and 2014 mortality rates for female bears are alarming, and clearly unsustainable. If the state's liberal harvest quotas for sport hunters remain in effect, the area's bear population will decline to a point where neither hunters nor non-consumptive users will be able to spot bears.
- The USF&WS proposal includes stricter harvest limits in the Kenai's "back country". These are the most easily viewed bears - those that live closest to areas easily accessible to visitors, photographers and wildlife watchers. Continued substantial population losses among these bears will be a loss for the area's tourism industry.
- Any continued decline in the Kenai brown bear population is inconsistent with USF&WS's legal mandates, which include ensuring opportunities for non-consumptive users who value and enjoy wildlife for activities such as viewing and photography

I SUPPORT proposals 180 & 181 for the following reasons:

- The Cooper Landing, Seward and Moose Pass areas are world-famous, year-round meccas for family-oriented outdoor recreation.
- Traps set adjacent to multi-use trails and facilities are dangerous to pets and small children. Such trapping is clearly incompatible with routes designed to be easily accessed by families with children and dogs.
- Such regulations clearly specifying no trapping areas would go a long way to eliminate what can be emotional and unpleasant conflicts between recreational users and trappers - a "win-win" for both groups.

I OPPOSE proposal 150 for the following reasons:

- A heavily-used park such as Kincaid is incompatible with a moose hunt, even if the hunt is very limited in scope. It is disingenuous to initiate a sport hunt in the name of public safety.
- The current estimated moose population in the park is not excessive. Most of the moose are habituated to sharing the park with a wide variety of recreational users. Many Anchorage residents - likely a majority - value Kincaid's moose and accept their presence when they recreate in the park. Moose thriving in a city park add to Anchorage's unique character and lifestyle.
- If a problem moose is identified and needs to be removed, trained wildlife biologists are best equipped to deal with it, not sport hunters randomly targeting all cow moose. Utilizing readily available professional wildlife personnel would be much easier, safer, and result in minimal

disruption to public use of the park.



PC091
2 of 2

Thank you for taking my comments into consideration.

best,

Laura Sneddon
Los Gatos, CA
408-221-9671



From: [Jed Zimmerman](#)
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Voting Proposals for Board of Game
Date: Wednesday, February 25, 2015 6:28:53 AM

Please vote "Yes" on proposals to limit brown bear hunting and restrict trapping near recreation areas on the Kenai Peninsula, and to vote "No" on a plan to initiate a moose hunt in Anchorage's Kincaid Park

Proposal 170: SUPPORT
PROPOSALS 180, 181: SUPPORT
PROPOSAL 150: OPPOSE

Thank you,
Jed B. Zimmerman



From: [louise.kane](#)
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Proposals on game
Date: Wednesday, February 25, 2015 7:48:15 AM

Dear Board of Game

I am writing to ask you to vote yes on the proposals to limit brown bear hunting and restrict trapping near recreation areas on the Kenai Peninsula, and to vote "No" on a plan to initiate a moose hunt in Anchorage's Kincaid Park . I am strongly opposed to any and all trapping, snaring. Additionally please do not hunt and trap wolves!

Louise Kane
louise@kaneproductions.net

Jack Reakoff Comments on Sheep Proposals 207 and 208 add-on to the BOG March 13-17 meeting in Anchorage South-central.

Dear Alaska Board of Game,

The last ten years have seen significant changes in the Dall Sheep population. The declining population and static demand has intensified competition dramatically in some areas. The road accessible in areas like GMU's like 20A, 24A, 25A, 26B has intensive resident users. Because it is cheaper fly from road access jumping off points the resident sheep hunters charter within one hour or less of a road.

The unlimited guide restrictions on the State, BLM and private lands overlying these problem areas are where most sheep hunter conflicts are occurring. Un-restricted guides have no incentive to conserve any legal ram. Especially since the decline in available rams has caused an increase in hunt prices.

If they do not take the rams the other 9 guides with assistant guides who are hunting adjacent to them will.

Long established guides are being over run with new guides with aircraft support. The advent and common use of the Satellite phone also allows guides to have instant check in with assistant guides. Several guides have a plane ready for instant dispatch to pick up successful hunters, or to fly and re-spot rams that were missed by a client. The client and assistant guide are then re-dropped off for the next days hunt starting after 3 AM of the next day.

All other resident and non-resident guided hunters who are not using extreme technology to spot, communicate with aircraft support to pursue dall sheep, are at a distinct disadvantage and dissatisfaction. Continual disruption of sheep and other hunters with aircraft use, spotting and landing on the mountains has become intolerable for ethical hunting guides and hunters. There are residents with aircraft but they are a minority of the problem.

I feel strongly that the problem areas in GMU 24A, 25A, 26B, 20A, 19C and maybe others should be addressed at the March 13-17th meeting. The revision of the sheep management plans will take another 2-3 years to implement. Action taken now for the problem areas could have a sun-set of 2-3 years, if the Board prefers regulatory alignment with a sheep management planning effort in the future. I feel resident hunters should pay a tag fee of 25-100.00 dollars. I feel the BOG should request the legislature to increase the non-resident tag fee to 1000.00 and implement a resident dall sheep tag fee. Hunter demand is such this will have little affect on hunter participation.

I am supportive of Proposal 207 option 1 restricting the use of aircraft to spot sheep during the sheep season, with an increase until 2 PM of the following day to take dall sheep.

It is currently against guide ethic regulation to spot game to pursue. This has little enforcement. If the BOG restricts the use of aircraft, there will surely be better enforcement and consistent restriction of all sheep hunters in the field.

I am supportive of proposal 208 option 1 restricting non-residents to a calculated drawing hunt on State, BLM and private lands. I feel the allocation of non-residents to be drawn should be no more than 25% of available rams, in GMU 24A, 25A, 26B and 20A. Resident allocation in these units should be the majority allocation.

I support option 5 for resident hunters. Resident hunters should not have to draw a permit. A system to rotate resident hunters through 3 distinct hunt periods would reduce resident competition throughout the season. I listened to comments regarding using last name initials, and hunting partners during the sheep work shop.

If using hunter initials is unacceptable to the resident hunters, a drawing for placement into the three split seasons could be used to start the system. Once a resident hunter is drawn and placed in a hunt cycle that person would stay on that hunt rotation indefinitely. New resident hunters could either enter a placement drawing, or be required to enter the second and third hunt period to start their rotation.

Thank you for your considerations,

Jack Reakoff
Wiseman, Alaska

Maniilaq Association

PC095
1 of 1

P.O. Box 256
Kotzebue, Alaska 99752
(907) 442-3311

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

February 24, 2015

Attn: Board of Game Comments re: Proposal 202 – 5 AAC 85.025(a) (16-21) Hunting seasons and bag limits for caribou, and 5 AAC 92.085 (2) (D) Unlawful methods of taking big game; exceptions;

Dear Board of Game Members:

On behalf of Maniilaq Association, please consider this as our formal written comment in response to your advertisement to the proposed changes in the existing hunting regulations, as outlined in Proposal 202.

We are in full support of the recommendations outlined by the Western Arctic Caribou Herd Working Group in their February 4, 2015 submission, which we have attached to this letter.

We appreciate your serious consideration of the comments submitted by the Working Group when drafting the final revised regulations, as the changes suggested are critical to the long-term sustainability of the Western Arctic Caribou Herd, and the people of our region (GMU 23).

Sincerely,

A handwritten signature in black ink, appearing to read "T. Schuerch".

Tim Schuerch
President/CEO

Member Villages

Ivisaappaat, Nunatchiaq, Ipnatchiaq, Katyaak, Kivaliniq, Laugvik, Qikiqtagruk, Nautaaq, Nuurvik, Akuligaq, Isimmaq, Tikigaq, Ambler, Buckland, Deering, Kiana, Kivalina, Kobuk, Kotzebue, Noatak, Noorvik, Selawik, Shungnak, Pt. Hope



From: [Maxine Franklin](#)
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Proposals
Date: Thursday, February 26, 2015 1:22:45 PM

Proposal 150: Oppose

A moose hunt in Kinkaid Park is not needed and a greater danger to public safety than the moose now represent by their relatively small numbers, and the few incidents that have occurred. If a specific moose does in future prove dangerous to the public, the most appropriate action would be to have the moose dispatched by trained wildlife agents.

Proposal 155: Oppose.

Proposal 167: Oppose. Hunting moose during their winter weakness is a bad solution to the problem of motor vehicle/moose collisions. Cutting back the roadside vegetation would be better. Driving more slowly in conditions of poor visibility (driver responsibility) is also advised.

Proposal 170: Support

This proposal may help stop the recent decline of Kenai Peninsula Brown Bears.

Proposal 171: Oppose

The US Dept of Fish & Wildlife's proposal seems like the better solution.

Proposals 172, 173, 174. Oppose

For public safety all bait & carcasses should be removed from bear bait stations when the hunt is over. If it's too inconvenient to the hunters, they can choose not to draw bears in with bait stations.

Proposal 178: Support

Permanently IDing traps will help trappers claim their gear if a dispute in the field occurs. It will allow better enforcement of existing regulations. It will also encourage more ethical trapping methods.

Proposal 179: Oppose

Why would trappers want to remain anonymous? Having a name and address, or a driver's license number permanently affixed to the trap would facilitate law enforcement.

Proposal 180: Support

Trapping on or near popular heavily used roads, lakefronts, campgrounds and trails is incompatible with other recreational uses. Traps and snares are dangerous weapons, and have caused numerous injuries and fatalities to beloved pets, and pose a clear danger to



people as well. Many communities in SC Alaska are now too crowded for close

Proposal 181: Support

For the same reasons as above (Proposal 180).

Proposal 191: Oppose

Just because felt-soled waders aren't the only way invasive plants and animals are introduced to Alaska waterways and lakes doesn't mean they should be allowed. Other means of limiting the spread of invasives need to be added to management tools as well.

Proposal 192: Support

Proposal 193: Support

This should help increase public safety.

Proposal 194: Oppose

Trappers already have the fewest number of regulations of any other hunter group. Now they want to limit bird hunters' activities, so they can trap without the chance of catching valuable bird dogs? Maybe it's the trappers who should be required to stay away while bird hunting is in season...this is the most absurd proposal I've ever read!

Proposal 195: Oppose

Removing contaminated soil is a reasonable requirement in these situations. Bait stations are questionable in that they introduce bears to human food, training bears (those that feed but don't get shot) to potentially seek out other human foods in yards or dumps. Leaving residues at baiting stations continues to be a draw bears after the hunt, which could easily become a public safety issue.



From: [Paul Chanek](#)
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Comments for BOG meeting March 13, 2015
Date: Thursday, February 26, 2015 1:02:06 PM

To: Alaska Board of Game
From: Paul Chanek, Chugiak, AK 99567 pchanek@ak.net
Re: Comments for BOG meeting March 13, 2015

Please SUPPORT Proposal 170 by the US Fish and Wildlife Service (brown bear hunting limits)

Brown bears are getting precipitously low in number on the Kenai, particularly females, if you are to believe the US F&W Service (and I do--their findings are based on scientific study not anecdotes). Bear hunting should be limited, as they propose, at this time. We all enjoy seeing brown bears on the Kenai, one of the few places you can see them so close to Anchorage. Wildlife viewing (especially of such an increasingly rare species as brown bear) is a major tourist attraction, which I'm sure businesses on the Kenai well appreciate. With bear numbers as low as they are, this is a sound proposal which makes sense.

Please SUPPORT Proposals 180 & 181 (trapping setback limits)

These proposals are just common sense. They put into place limits that should have been there long ago (and which, I'm willing to bet, most Alaskans already assume ARE in place). Any traps should be set long and far away from public trails and roads, particularly in areas as highly used as those in the proposal. I personally walk dogs on trails--including those in the mentioned areas. It's absurd that traps can be set so closely that even leashed dogs (or even my own foot!) might be caught in one. What's the reasoning behind this? Hundreds (thousands?) of people use these trails constantly--adults, kids, many with their pets. How does that compare to usage by trappers? Clearly, trapping so closely is dangerous and unwelcome. It should always be kept to areas far enough away to prevent accidents. I don't think 250 feet off-trail is too much to ask of a serious, responsible trapper. A trap is the last thing I want to be thinking about when I'm out hiking on a public trail--and why should I have to? Again, this is just common sense.

Please REJECT Proposal 150 (moose hunt in Kincaid)

Hunting moose in Kincaid Park is a ridiculous idea. You're asking for nothing but trouble in such a highly used public area, no matter what time of year a hunt would be held. Moose are not a problem in the park, clueless park users are. I have used Anchorage park areas for 30 years---hiking, biking, skiing--and have had no problems with moose, though I have, of course, had more than a few encounters. I have always followed one rule: moose always have the right of way. It's worked for me and everyone I know. If there are problem moose in Kincaid, they can be dealt with, as-needed, by officials, like any other problem. I personally enjoy seeing moose and do not want them eliminated from Kincaid. It's all part of the "big wild life"



we enjoy up here. These moose are also used to human contact--what kind of that be? Sounds more like hunters looking for easy pickings, rather than any kind of real safety issue, as it's being presented.

Thanks for considering my comments. I have lived in Alaska since 1984 and have always been an outdoor recreational user.

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From: [Jeffrey](#)
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: PROPOSALS OF USF&WS CONCERNING THE HUNTING AND TRAPPING OF BROWN BEARS AND MOOSE.
Date: Thursday, February 26, 2015 7:31:24 AM

Dear Alaska Board of Game Officers:

Below please find my comments pertaining to USF&WS Proposals 170; 180; 181; and 150.

I SUPPORT PROPOSAL 170: Population estimates for the brown bear population on the Kenai Peninsula are difficult to obtain because of dense forestry, and past estimates have indicated a decline—especially in females. Given the inevitable conflicts which may arise when wildlife habitat is encroached—however unintentional by recreational visitation—such conflicts are not resolved by mindless hunting by sports hunters, but should be investigated on a case-by-case basis by professional wildlife scientists and troopers. Wildlife management’s priority is always coexistence, not eradication. The brown bears of Kenai have a notorious low reproductive rate, and harvest limits should always err on the side of conservatism based, in large part, on the quantity of females who are killed due to human caused mortality (HCM). The USF&WS’s stated mission is to protect wildlife for “the benefit of the American people,” which includes not only sports hunters, but wildlife watchers, photographers, visitors and all other nonconsumptive users of this precious area. I will not visit this area again knowing that hunters are killing off an animal whose only crime is that it is alive and well. I will make every effort to my fellow tourists and others in the tourist industry to not visit an area that will become a killing ground. Alaska Board of Game: Please adhere to the USF&WS’s legal mandate to the American people, and practice your shooting and hunting skills in Iraq and Syria where it can be utilized most appropriately.

I SUPPORT PROPOSALS 180; 181: Trapping is cruel and inhumane—no matter what the target animal is. Any traps that are not set well beyond selected setback areas will injure or kill non-target animals—whether they are recreational visitors’ companion pets or other wildlife. Small children will also become endangered by these traps. Any tourists or recreational visitors to this area, upon seeing the unsightly and malevolent structure of a “trap,” will feel upset and nauseous, perhaps never to return again to this area. I know that I won’t. Most users of our nation’s wildlife areas today do not want to see bullets, blood, guts and animal suffering. Only education and respect for these majestic animals—so vital to their ecosystems—can avoid conflicts. Users of this area must be presented educational information that will enhance their experience by nurturing a healthy respect for brown bears, and their foraging for food is a fact that can be circumvented by our careful habits and clean-up rigor when in this area. “DO NOT ATTRACT TROUBLE” or something to that effect should be posted widely throughout this area.

I OPPOSE PROPOSAL 150: Disabled hunters should not seek to disable other living creatures. A



more therapeutic activity should be to increase the moose population, not decrease numbers are dwindling in the lower 48 states; scientists suspect climate change as the reason. It is inviting disaster to think that the small populations in these areas can become locally extinct without affecting regional populations. People love watching moose—not killing them. They have become iconic fixtures, and their presence enriches us.

Thank you for allowing me to comment.

Yours truly,
Jeffrey Kramer
New York City





From: [ssa1269](#)
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: SUPPORT for Proposal 170
Date: Thursday, February 26, 2015 7:17:18 AM

Members of the Alaska Board of Game

This email is being sent to voice our SUPPORT for Proposal 170

The biggest draw to Alaska is your wildlife and your natural resources. The main reason for us visiting is the wildlife. The decline of the breeding female population of brown bears on the Kenai Peninsula must be wisely managed. Fatality counts must not just figure in those killed by hunting, but all other methods as well.

Because these brown bears are an isolated population, have low reproductive potential and are difficult to monitor, bear management on the Kenai requires a very conservative approach. Documentation shows in 2014, 69 bears on the Kenai were documented as having died as a result of HCM. Of those bears, 19 (28 percent) were females and 6 were reproductive-age females. The previous year, 70 bears were documented as HCM. Of those, 34 (50 percent) were females and 24 were reproductive-age females. Telemetry data from radio-collared bears indicated almost 30 additional bears died of unknown causes in 2013, likely many of them females.

The documentation for the 2013 and 2014 mortality rates for female bears are alarming, and clearly unsustainable. If the state's liberal harvest quotas for sport hunters remain in effect, the area's bear population will decline to a point where neither hunters nor non-consumptive users will be able to spot bears. Seeing a bear in the wild was the highlight of our trip; likewise, it was the major disappointment of others who did not have the privilege of spotting one on their trips.

Notwithstanding recent years' excessive mortality rates, the population was already at a low density compared to other coastal brown bear populations. Continued decline will result in substantial long-term damage to the Peninsula's ecosystems. Once that ecosystem is fractured, it is nearly impossible to get that balance back. Do not take that chance.

The USF&WS proposal includes stricter harvest limits in the Kenai's "back country." These are the most easily viewed bears - those that live closest to areas easily accessible to visitors, photographers and wildlife watchers. Continued substantial population losses among these bears will be a loss for the area's tourism industry. This is your biggest draw. If we had not seen the wildlife we did, we would have not encouraged others to go. With our delightment in the wildlife viewing, we told all it would be a dream trip....to see the wildlife in its natural habitat....awesome! Do all you can to protect this experience for all.

The legal mandates in place are there to ensure non-hunters get the enjoyment of these magnificent animals also. Any continued decline in the Kenai brown bear population is inconsistent with USF&WS's legal mandates, which include ensuring opportunities for non-consumptive users who value and enjoy wildlife for activities such as viewing and photography. Please, do all you can now to ensure the ability of your area to make those



memories for generations to come.

Thank you for your time.

Mr and Mrs Steven Aubry
Wisconsin Residents/Alaskan Visitors

Sent from my Samsung Galaxy Tab®|PRO



From: [ssa1269](#)
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: PROPOSAL 150: OPPOSE
Date: Thursday, February 26, 2015 7:37:06 PM

Members of the Alaska Board of Game

This email is being sent to voice our OPPOSITION for Proposal 150

We oppose for the following reasons.

A heavily-used park such as Kincaid is incompatible with a moose hunt, even if the hunt is very limited in scope. It is disingenuous to initiate a sport hunt in the name of public safety.

The current estimated moose population in the park is not excessive. Most of the moose are habituated to sharing the park with a wide variety of recreational users.

Increased public education focused on ways to avoid moose encounters, rather than killing most of the moose, is a much more appropriate means of preventing conflicts.

Many Anchorage residents - likely a majority - value Kincaid's moose and accept their presence when they recreate in the park. Moose thriving in a city park add to Anchorage's unique character and lifestyle.

If a problem moose is identified and needs to be removed, trained wildlife biologists are best equipped to deal with it, not sport hunters randomly targeting all cow moose. Utilizing readily available professional wildlife personnel would be much easier, safer, and result in minimal disruption to public use of the park.

Please take these points into consideration. Thank you for your time.

Mr. And Mrs. Steven Aubry
Wisconsin Residents/Alaska Visitors



From: [ssa1269](#)
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: PROPOSALS 180, 181: SUPPORT
Date: Thursday, February 26, 2015 7:18:49 PM

Members of the Alaska Board of Game

This email is being sent to voice our SUPPORT for Proposals 180 and 181

PROPOSALS 180, 181: SUPPORT

We are writing to advise that we are in support of the above two proposals. Wildlife viewing is one of your most Important tourism draws. We could not imagine our trip to Alaska without the wildlife. There always seems to be a fine line to balance hunters/trappers rights with those of non-hunters/trappers. These proposals are a win-win situation for all.

Points to consider:

The Cooper Landing, Seward and Moose Pass areas are world-famous, year-round meccas for family-oriented outdoor recreation.

Traps set adjacent to multi-use trails and facilities are dangerous to pets and small children. Such trapping is clearly incompatible with routes designed to be easily accessed by families with children and dogs.

The proposed setback areas are limited in scope and clearly delineated. The regulation would be easily enforceable by wildlife troopers.

Such regulations clearly specifying no trapping areas would go a long way to eliminate what can be emotional and unpleasant conflicts between recreational users and trappers - a "win-win" for both groups.

It is inequitable that the activity of just one user group - trappers - deters people partaking in many other activities from safely enjoying multi-use public facilities and trails. Nothing in the proposals restrict trappers from simply placing traps beyond the setback.

Please take these points into consideration. Thank you for your time.

Mr. And Mrs. Steven Aubry
Wisconsin Residents/Alaska Visitors



From: [Martha Wavrin](#)
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: upcoming proposals 150, 170, 180, 181
Date: Wednesday, February 25, 2015 7:54:16 PM

PLEASE support Proposals 170 and 180, 181 to protect the Kenai brown bear population and restrict trapping on the Kenai Peninsula.

PLEASE oppose Proposal 150. Kincaid Park is a special place with the moose and should remain as it is!

Thank you.

Martha Wavrin