

Submitted By  
Wanda Wolford  
Submitted On  
3/4/2016 3:27:00 PM  
Affiliation

I oppose Prop 90 taking goats and sheep off the "clean list" and adding unreasonable regulations on to their owners. There is not enough scientific evidence to do this from what I have recently read. The distance between wild sheep populations and the domestic animals being considered, in most cases, is immense. In addition, I am disappointed that the people who own goats and sheep do not seem to have been equally represented in this matter. (also not in a timely manner)

Decision making should not be left primarily to a "hunter" weighted game board with individuals that may benefit from this proposal. Alaska has a unique set of circumstances that should be considered and there should be genuine collaboration between those most affected by this decision. My understanding is that has not happened. Equal Representation.

Adopting prop 90 would be putting unreasonable and unnecessary financial hardship on people who raise these domestic animals for meat, milk, fiber and make our state more self sufficient in doing so. Additionally it would cost The State of Alaska a ridiculous amount of \$\$ to implement.

NO on prop 90 Thank you

Submitted By  
Wes Swanner  
Submitted On  
3/4/2016 4:35:56 PM  
Affiliation

In opposition to Prop 90, and in light of lack of public inclusion, poorly conducted and quoted studies, and Expand and Exclude policies of the WSF, we respectfully request:

**Collaboration:** We would like to participate in developing solutions with ADF&G to improve the health of all Alaskan animals, wild and domestic.

**Representation:** We ask for equal representation and a fair hearing within the forums that are discussing this issue (Board of Game Meetings, Dall Sheep Working Group, etc.).

**Scientific Integrity:** We ask that both sides of the scientific debate be presented and reviewed and that ADF&G creates a thorough risk assessment that adheres to the National Academy of Science's Redbook guidelines.

**Alaskan Solutions:** We ask that solutions be tailored to address the reality of Alaska's unique habitat.

**Language Clarity:** Sheep Habitat is an amorphous boundary as opposed to Sheep Preserves. disease states are multifaceted and crucially different from disease agents and testing positive is not an indication of a contagion.

**Respect:** for the autonomy of production of non-priveledged protien (costs for wild sheep meat can approach 250.00 per pound), on private property.

Submitted By  
Wes Walker  
Submitted On  
3/4/2016 9:49:24 AM  
Affiliation

Dear Members of the Board of Game:

Being a Dall Sheep hunter who owns goats, I have strong objections to Proposal 90 which calls for removal of domestic goats and sheep from the clean list. I am opposing Proposition 90 for these reasons:

It infringes on the inherent rights of Americans to produce their own food on their own property.

Unlike the "lower 48", Alaska's domestic sheep and goat population does not free range on public lands where contact with wild sheep could potentially occur. Domestic sheep and goats are generally located many miles from wild sheep populations, with virtually no likelihood of contact due to the existing natural barriers such as rivers, highways, mountain ranges.

To date there has not been a single proven case of disease transmission from domestic sheep or goats to wild sheep in Alaska. Even in the Lower 48, it has not been conclusively proven that domestic sheep and goats were the cause of die-offs due to disease in the wild sheep population. In fact, wild sheep have been proven to be carriers of *M. Ovipneumoniae*, with effects being exhibited under naturally occurring stress events such as weather, predation, lambing, parasite load, age, and poor nutrition (eg mineral deficiency).

The State of AK cannot afford to implement and enforce this proposal. It is in an economic crisis and such regulations will only drain it further.

Prop 90 would place severe financial limitations on Alaska's ability to maintain sources of clean, healthy food raised in-state. Limiting our food independence weakens our State. It could potentially place a higher reliance on wild game as a healthy food source, increasing the hunting pressure on local wildlife. This in turn will diminish wild sheep populations.

I am not opposed to hunting in Alaska, as our family supplements our food source with wildlife. Protecting the Dall Sheep is an honorable desire. However, it seems quite clear that Proposal 90 will do very little to protect the Dall Sheep and very much to jeopardize the livestock industry in this State. I firmly believe there are better ways to protect wild sheep such as enhancing their nutrition eg selenium licks dropped in their habitat.

I strongly urge you to reject Proposal 90 and instead, explore viable ways of protecting Dall Sheep while preserving the livestock industry.

Sincerely,  
Wes Walker



To the board members of Alaska Board of Game,

I ask that you do not enact Proposal 90. There are a number of problems with the premises and requirements of Proposal 90, and enactment of this extreme and unnecessary set of costly requirements (both to individuals domestic sheep and goat owners, and to the State of Alaska) would place extreme hardship on all Alaskan sheep and goat owners. There are no commercial goat or sheep operations in Alaska, and Alaska's owners of domestic goat and sheep generally own only a few sheep or goats on small fenced acreage, on a small personal budget, located far from wild sheep habitat. Satisfying Proposal 90's requirements for double fencing, testing, and permitting is completely unreasonable, financially burdensome, and unnecessary. All owners would be hit hard by the inability to import new genetics, as animals not on the "Clean List" may not be imported. Consequences for non-compliance with any of the new rules would include fines and eradication of livestock. For many owners their sheep and goats are not just producers of wool, milk or meat, but are their life's passion and beloved family pets or children's 4-H projects. It's not just about the owners' animals, it's about the freedom as taxpaying landowners to use their land to grow their own food.

I have researched this topic extensively and I have yet to find any factual evidence that domestic sheep and or goats have had any impact on any wild sheep populations. I know there are "ideas" that there may be some impact but it has not been able to be proven. What has been proven, is stress on the animals caused by hunting, aircraft, weather changes and natural predators.

This proposal will place an undue financial burden on all Alaska small scale and hobby farmers for no factually based good reason. Also undue financial stress on the already overloaded Alaska Department of Fish and Game. How will this be enforced? By who? Who will pay for the administration and the oversight of this proposal?

Please do not pursue Prop 90!!

Thank you for your time

Will Holden  
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Submitted By  
Andy Josephson  
Submitted On  
3/4/2016 4:16:42 PM  
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Proposal 90 needs to be re-thought. First, is there evidence that disease is spread from sheep and goats used for domestic purposes and sheep and goats in the wild? Second, what motivates the proposal? Is there a reason other than the spread of disease.

I'd ask for you to very, very carefully ask what this is designed to accomplish. Please note that Alaska is trying to diversify and promote ag-related industries.

Thanks,

Andy Josephson

Submitted By  
Amy Seitz  
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3/4/2016 3:00:26 PM  
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**Proposal 90:**

The Alaska Farm Bureau, Inc. is urging the Board of Game to oppose proposal 90 which would remove sheep and goats from the “clean list”.

To date there have been no cases of Dall sheep deaths in Alaska related to contact with domestic sheep or goats. Alaska is not a free grazing state, and with natural and man made barriers between Dall sheep habitat and domestic flocks, there is a very low probability that wild and domestic sheep/goats will come into contact. There are studies that indicate contact alone is not enough for a wild sheep to become diseased, other stressors are involved that weaken the wild sheep’s immune system.

Given this information, the Alaska Farm Bureau has taken the stand that there is time to have a collaborative effort to ensure the future health of our wild herds without being detrimental to our sheep and goat owners and we do not need regulatory or statutory changes to accomplish this. At this point there is not evidence of just cause or an existing problem in Alaska; laws should be put in place to address an actual issue, not the fear of a potential issue.

Discussion on issues affecting livestock management should take place with agencies given this authority. No agency that works with livestock producers or producers themselves were contacted prior to proposal 90 being submitted. The office of the State Veterinarian already has the authority to “issue orders or permits relating to or authorizing examination, inspection, testing, quarantine or embargo of animals or animal products”, this is to prevent the spread of pests or contagious or infectious disease.

The Alaska Farm Bureau strongly urges the Board of Game to oppose proposal 90. Allow the rules that are already in place to continue working. Give time for all stakeholders to have meaningful, productive conversations on any issues that might need to be addressed. Livestock producers, State Veterinarian and Division of Agriculture should all have a seat at the table for any discussions that affect the management of livestock.

**Proposal 91:**

The Alaska Farm Bureau opposes proposal 91. This would have a statewide affect to address an individual issue. There are already statutes and regulations in place that addresses the issue of cattle not “under direct control of an owner”. The Commissioner of ADF&G is given the authority to capture, destroy or dispose of these animals in an appropriate manner. If there is a situation of cattle not being under the control of an owner, those can be dealt with by the regulations currently in place.

Please oppose proposal 91 and use the current regulations to deal with any individual situations.

Submitted By  
Anthony Mosher  
Submitted On  
2/26/2016 9:26:22 AM  
Affiliation

I am against Props 90 and 91. None of it is science based, regardless of what is stated in the news articles. Most "facts" presented aren't locally produced. They've been scavanged 20 year old information from Nevada and passed it off by the state hoping farmers and homesteaders will go along with it. I own animals on my property...and it's none of the state's business what I feed them, or don't feed them. And the "facts" that were produced in an October 1997 report from ADF&G written by Bradley Scotten claims that all the wild sheep they studied killed were DUE TO WILDLIFE. This didn't include the fact that his own crew was indirectly responsible for the DEATH of two lambs because they were not able to be reunited with their ewe and were subsequently killed by an eagle. My animals don't leave my property and if they did, that's between me and the neighbors. I'm not going to brand any of my animals either. If a man can't determine the difference between a moose and a bovine...they have no business hunting. They are fools. If the ADF&G want to save the sheep population...quit handing out hunting tags for ewes and limit the buck tags. Until then, go bark up another tree and leave the farmer and homesteaders alone.

Submitted By  
Dan Krause  
Submitted On  
2/29/2016 11:49:22 AM  
Affiliation

There are several reasons to oppose Proposal 90 and 91 but here are the ones shared by the Alaska Farm Bureau which I completely agree with:

- The health of Alaska's Dall Sheep population is important, but proposal 90 is an extreme approach to deal with something that has not become an issue in Alaska. There is time to approach this issue in a logical manner and form a plan that fits Alaska, without harming the livestock industry.
- Alaska is not a free grazing state. Between fencing and natural barriers there is a low likelihood of close contact between wild sheep and domestic sheep/goats.
- There is no documentation of Dall Sheep deaths due to contact with livestock.
- We oppose any form of permitting for simply owning livestock - this discussion should be limited to activities in Dall Sheep habitat or near enough that there's a high probability of close contact.
- The bacteria of concern (*M. ovipneumoniae* and *M. haemolytica*) are endemic in wild and domestic populations, disease develops when immune systems become depressed.
- Reductions in Dall Sheep numbers due to disease should factor in multiple stressors: weather, predation, avalanches, lambing, parasite load, age and nutrition.
- There should be a livestock-wildlife working group formed to collaboratively work on issues such as this one.

Proposal 90 and 91 lack any scientific credibility and should be immediately struck down.

Thank you,

Dan Krause





Submitted By

Daniel

Submitted On

2/25/2016 9:07:22 AM

Affiliation

Vote NO on Proposals 90 and 91



Submitted By  
Debra Harley  
Submitted On  
2/29/2016 12:56:41 PM  
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I oppose proposition 90 and 91!!!

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I am in firm opposition to Prop 90 & Prop 91 as a livestock producer who relies on my sheep & goats to provide not just meat, wool & income. The lack of proven transmission of the pneumonia virus (already exists in wild sheep populations) by domestic sheep & goats makes this seem like a knee jerk reaction. The fact that this proposal has been put forward by big game hunting interests is also suspect. I am a hunter as well & can understand the need for conservation of wild sheep. Restricting the ability of Alaskans to produce their own food & to provide food to their community is not the way to do so however. This proposition will negatively affect livestock producers who are already paying very high prices to maintain their flocks through Winter. If they go out of business, the income of hay and grain farmers, feed stores, shearers, artisans who rely upon the wool and goats milk will also be adversely affected. We Alaskan's need every possible resource to make our lives better & to be less reliant upon food shipped up from outside! Please consider carefully ALL repercussions of this proposal instead of listening only to the appeals of a small group who have a very narrow field of view. The wild sheep federation and the hunting guides behind this proposition have not considered any real scientific options before submitting this proposal. Nor have they thought of the economic implications for those whose livelihood is dependent on their flocks.

Submitted By  
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2/24/2016 1:31:51 PM  
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~~The Board of Game, in conjunction with Wild Sheep Foundation is building proposals for regulations to take goat and sheep off the Clean List. Please do NOT go forward with this. Leave domestic livestock, sheep and goats in this proposal and any other cattle, hogs, or livestock in the future, on the CLEAN List.

The Board meetings are not publicized, and they do NOT have any agriculture representation.

I and 5 others attended local Soldotna Board of Game meeting in Soldotna January 21, 2016. Four of the five who own livestock, including sheep and goats, spoke against the Proposal 90, and there was discussion amongst the speakers and the Board members; the resulting vote was 9-0 against.

Taking the animals off the Clean List means that normal life will be restricted for livestock owners, be they farmers, self sufficient citizens, pet owners, or any other citizen.

- No goats or sheep can be brought into Alaska.
- No goats or sheep can be processed in the meat facility in Palmer (the only one available to our people on Peninsula, Anchorage, and Mat-Su).
- 4-H Market Livestock would lose choices and opportunities without processing availability.
- No animal on Not Clean list can be shown at Fairs or used in 4-H
- If anyone does have goats and sheep they will need a permit to own them, will have to be vet tested, and some circumstances will require special double fencing. A permit to keep livestock effectively means "permission" to keep. If permission can be given, it can be taken away. When Food Security is considered, a permit is counter-productive.
- If the livestock can't be used in farming, 4-H, meat or milk operations, transported or butchered, they are therefore restricted from the food supply (meat and milk). There goes Local Food source and Food Security.
- Pet owners of sheep and goats will have different needs, but will still want to purchase feed and supplies.
- One more thing: the farming lifestyle teaches kids about respect, compassion, husbandry, ingenuity, work ethic, and circle of life. All will be lost.
- Retail business that sell feed and farm supplies will lose a segment of customer base, creating a hit to the economy and to the community.

The Proposal 90 is currently promoted by the Wild Sheep Foundation for Alaska, with the guidance and backing of the national Wild Sheep Foundation. This organization is largely funded by government agencies.

The Fairbanks meetings will actually have national Wild Sheep Federation in attendance. Their mission is to enhance wild sheep populations and promote the interest of the hunter. They get millions of dollars in support from State, Provincial, and Tribal agencies, including State Fish and Wildlife agencies. Their 2014-2015 Annual Report states that 69% of their funding, \$3,022,521 came from government entities.

To mention a few:

Alaska Department of Fish and Game \$171,000  
Arizona Department of Fish and Game \$254,000  
California Department of Fish and Wildlife \$125,250  
Colorado Parks and Wildlife \$110,700

And on it goes with Montana, Idaho, Nebraska, New Mexico, Oregon, Utah, Washington, and Wyoming Fish and Wildlife departments contributing hundreds of thousands of dollars each. And that is just the states. There are many more agencies and tribal governments contributing, including even Canada.

It is not the government's job to define how or why people have animals. Agenda 21, aka Sustainable Development, created at the United Nations, plays a part in this incremental destruction of small farms, and a way of life that is part of the foundation of America.

<https://sustainabledevelopment.un.org/content/documents/Agenda21.pdf>

But according to the United States Constitution government agencies do not have the power to take away people's rights to own animals and provide their own food supply. (Article 1, Section 8, and Amendment 10). It appears that the State Fish and Game departments will bypass the intent of the Constitution by funding private hunting entities and foundations do the work of promoting Proposals like #90 in

order to, in essence, put a whole class of people (farmers and livestock owners, and support services) out of business.

Farming lifestyle benefits all because it teaches children the value of life, work ethic, respect for nature, animal husbandry, circle of life, ingenuity, and compassion. Having sheep and goats and other livestock provides food security, local food supply, clean food, very fresh. Keeping livestock as pets must not be discounted. Young people who grow up with animals learn many things, and can eventually move from pet owners to their own food production.

No disease transmission has ever been documented from domestic sheep and goats to wild sheep in Alaska. Removing sheep and goats from the Clean List will effectively and eventually reduce drastically the amount of livestock in individual ownership, for it will not stop there. Chickens have already been targeted via NAIS and Traceability, and it is only a matter of time before cattle and hogs will be restricted. I wonder if the Wild Sheep Foundation realizes it is being manipulated and bought by the architects of Agenda 21, one goal of which is to change consumption patterns, and another of which is to control the food supply. Agenda 21 uses the environment, call it climate change or global warming, or save the planet, all of the above, to restrict human activity.

I implore you to take into consideration the points above, and vote AGAINST Proposal 90. Keep sheep and goats on Clean List.

Dianna Taplin  
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Farmer, Livestock Owner, Farm Store Business Owner

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3/4/2016 1:03:50 PM  
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This comment is on Proposal 91 Permit for possessing live game, including cow...

I object to the inclusion of cows in the proposal, I request that you vote down this proposal.

Domestic cows are not wild game, and are very distinguishable from wild game, even when termed "feral". I fear this endangers domestic cattle because of mixups etc. and the farmers of all domestic animals, specifically in this instance, need the assurance that their livestock (aka livelihood) will not be targeted.

Vote NO on Proposal 91

Submitted By  
Gerald  
Submitted On  
3/2/2016 1:33:59 PM  
Affiliation

I, Gerald DeVilbiss, strongly advise the Board to reject proposal 90 and 91. It would have greivous impact to all the livestock community and Alaska farming as a whole.

Proposal 90 is a knee jerk reaction that has no scientific backing and in the State of Alaska, where there is miniscule contact between domestic livestock and wild game, it is very unlikely to have any effect other than burdening public with more regulation.

Proposal 91 is a blanket solution to a selective problem. Cattle are livestock and should not be classified within the confines of "game". If this were to pass it would increase the cost of fencing for all the farmers raising cattle and possibly drive some farmers out of business. It would be a major economic adversity if someone were to come upon some or all of a farmers cattle before the farmer could get them put back in. So please find a local solution to a local problem.

Thank you,

Gerald DeVilbiss



Submitted By

Hara

Submitted On

2/25/2016 9:05:49 AM

Affiliation

Please vote NO on Proposals 90 and 91.

Submitted By  
Heidi Chay  
Submitted On  
3/4/2016 10:56:53 AM  
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Proposals 90 and 91 have generated numerous calls and emails to my office from concerned owners of domestic livestock. On their behalf, I urge you to take no action on Proposals 90 and 91 and, if necessary, to form a livestock-wildlife working group to collaboratively resolve the concerns these proposals purport to address.





Submitted By  
Jaime  
Submitted On  
3/3/2016 7:23:38 PM  
Affiliation

Prop 90 & 91 are total overkill considering the vague science behind them and the special circumstances of Alaska. It unduly targets peasant people like me (and my family of 9) backed by speculation, hypothesis, and big money interests. Don't do it!

Submitted By  
John Anderson  
Submitted On  
2/24/2016 8:38:48 AM  
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~~To the members of the Board of Game,

I am writing to you today in response to PROP 90 and PROP 91. As a small business and family farm here in the Interior I strongly oppose these proposals. Proposal 90 would essentially eradicate sheep and goat herds in the state. This would decimate the local farmers providing fresh milk, cheese and other by products as well as great tasting meat. This would impact all aspects of the state from the farmers producing the feed, to the customers who buy these products to also the state itself through Mount McKinley Meat and Sausage. Proposal 91 is just as devastating to many cattle farmers. By allowing open season on all cattle with out markings you fail to realize certain reasons why there could be a free roaming cow. For example, this fall we brought home a cow calf pair off of pasture. This heifer was born on pasture had never been handled by humans, had never been to our farm it was a brand new surrounding. While offloading this heifer she bolted from us and ran into the woods. We hadn't had a chance to ear tag her previously to this, and as such she would be fair game under your proposal. Luckily she came home within two days and we were able to get her back to her mother. Had we lost her to someone shooting her its economic impact on our farm would have been in the thousands. I understand this was not the intent of the proposal but that is exactly how your proposal reads. Please reconsider both proposals and stand with Alaska Agriculture.

John Anderson  
907 Livestock  
Fairbanks, AK

Submitted By  
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2/25/2016 4:36:57 PM  
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February 25, 2016

RE: PROPOSAL 90

Dear Member of the Board of Game;

The purpose of Proposal 90 is to maintain healthy native wildlife populations, specifically the population of Dall sheep, in Alaska. I think we can all be united with the desire to protect this magnificent animal, whose habitat is in some of the most breathtaking areas of our great State.

My family and I are long-time Alaskan's who love life here and enjoy fishing, hunting, and farming. I currently own domestic goats. My brother was an avid outdoorsman with a very special love for hunting Dall sheep and for the beauty of the areas in which they live. One of my most precious memories of my brother is his love and enthusiasm for Dall sheep hunting, which he shared in stories and pictures.

However, I have very grave concerns regarding Proposal 90 and the far reaching negative impacts this Proposal would have on life in our state. I question whether this Proposal, if adopted, would have benefits enough to counteract negative affects and costs to private citizens, governmental agencies, and our Alaskan economy.

I have many questions:

-Has Alaska domestic-wildlife contacts been studied? Where, when, and how are these contacts being made? In the lower 48, there have been areas of free range grazing on public lands where domestic animals and wildlife have contact opportunities. In Alaska, I don't know of any domestic goat or sheep herd that is free ranged. Has it been studied if, when, how, who, and where these contacts between domestic sheep/goats and Dall sheep are happening in Alaska? Would preventing these contacts significantly positively affect the numbers of Dall Sheep in Alaska? Is it necessary to sanction all sheep and goats in the State to prevent these contacts? Maybe efforts could more easily and cost effectively be directed specifically rather than statewide.

-If there are domestic-wildlife contacts in Alaska, what is the likelihood that the bacteria in question is transmitted?

-Are there other factors that have a greater influence on the herd than domestic-animal contact, such as weather patterns, predation, avalanches, lambing issues, parasite loads, age, poor nutrition including low mineral consumption, or irresponsible hunting practices?

-Prop 90 would significantly hinder the financial ability of Alaskans to raise & own domestic goats and sheep, thus significantly reducing locally grown food and fiber, thus hindering that economy in Alaska. Would approving Prop 90 benefit the Dall sheep population enough to warrant this?

- What government agency would enforce and manage the restrictions that would be placed on private citizens who keep sheep and goats in Alaska on private property? Who would monitor the farmers within 15 air miles of Dall sheep habitat and make sure they have Department-approved, double fencing? How will farmers pay for this double fencing? Will farmers still have enough property to house animals after double fencing is put into place along with the required space between fencing? Who will handle permitting of all sheep and goats in the state of Alaska. (That's a lot of animals.) Who will deal with of all sheep and goats in the State who's owners don't obtain permits or who aren't contained in approved fencing? Who will ensure that domestic sheep and goats on farms within 15 air miles of Dall sheep habitat are certified disease free? Who will pay for all this?

-Do laws already exist that take care of this concern of domestic animal and wildlife contact? For example, if there is loose livestock in the Matsu Borough, this can be reported and the MatSu Borough Animal Care & Regulation division can investigate and act on it. This is supported by Title 24. Maybe boroughs that provide for and respond would not need to be subject to any proposal.

-Are there already natural boundaries in Alaska between domestic and wildlife in place such as land vastness, rivers, lakes, roads, mountains, predators, unique natural habitats, etc.?

Considering this and many other questions and concerns, I would suggest the following to the BOG regarding this issue in response to Proposal 90:

- **Reject Proposal 90.**

-Know that the Alaskan livestock and agricultural community would like to participate in developing solutions with ADF&G to ensure healthy wildlife.

-The Alaskan livestock community would like equal representation and a fair hearing within the forums that are discussing this issue, (Board of Game Meetings, Dall Sheep Working Groups, etc).

-Consider requesting that the Governor create a Livestock-Wildlife Interaction Working Group that would not just look at sheep and goats but all domestic-wildlife interactions.

-ADF&G should create a thorough risk assessment that adheres to the National Academy of Science's Redbook guidelines after both sides of the scientific debate surrounding this issue are presented and reviewed.

-Any solutions need to be tailored to address the reality of Alaska's unique habitat.

Thank you for your time and consideration.

Respectfully,

Kelly Dellar

Submitted By

Kelly Dellar

Submitted On

3/3/2016 3:31:26 PM

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Dear Board of Game:

RE: PROP 91

I assume the writer of the Proposal really means to say "cattle" instead of "cow." I believe there is already laws in place to deal with feral domestic animals. This proposal is redundant. Please reject in its entirety. Thank you.

Kelly Dellar

Submitted By  
Kyle Butler  
Submitted On  
2/29/2016 5:14:13 PM  
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As farmers based in our great of Alaska, we have several concerns about PROPOSAL 90 - 5 AAC 92.029. and PROPOSAL 91 - 5 AAC 92.029(d)(2).

First we would like to clarify on our position on Proposal 90 - 5 AAC 92.029.

While we understand the need to support the native population of Dall sheep we also see multiple issues with this proposal. We would like to take this time to enumerate several of our issues

Firstly, disagree with the need for fencing off our property. As such, we disagree with any mandatory fencing laws or regulations. Forcing us to set up fencing on our property tramples upon our civil liberties.

Secondly, disagree with the proposals attempt to remove livestock from the "clean" list. We do not see any reason to remove goats, cows, or sheep from the "clean" list.

Thirdly, we would like to state that we care about the health and well-being of the native species. However, we feel that testing our livestock and property should only be required if we intend to sell the raw produce.

Secondly, we would like to clarify our position of Proposal 91 - 5 AAC 92.029(d)(2).

We would like to point out that cattle have been domesticated for thousands of years. If we wish to call cattle "feral game", then a poodle now classifies as a rabid wolf. As such, we find it erroneous for cattle to be classified as "feral game." While this classification would be valid applying to caribou, moose or Dall sheep, it fails to apply to cows, goats and sheep.

In summation, we would like for your board to reconsider passing this proposal. We find it over reaching and incompetent.

Submitted By  
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3/4/2016 7:51:27 AM  
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The Board of Game:

I am against both Prop 90 and 91 for the following reasons.

1. That this is an over reach of the government on the basis that there is a potential for harm to our wild sheep and goat population. That would be like me taking away the very guns that are used to hunt the animals on the basis that there is a potential for for one of them to shoot shoot a human being with their hunting gun.
2. Currently there are no cases of any disaeses being transmitted in this state.
3. The sheep and goats that have come into this state have been vet tested to the standards that are required. If we want then we should have them ttest for other desaeses.
4. That these actions are again an over reach of the what the board has been established to do.
5. That the disease that they propose could potentially be a problem is a nose to nose contact disease and is not airborne. Domestic sheep in the state do not roam where the wild sheep and goats currently range. In states where there has been a problem it may be because they move their flocks onto givernment land to graze. That would create a potential for nose to nose contact.
6. This is an over reach of my rights on the land that I own to do what I want with. It infringes on my constitutionall right to the pursute of happiness. Just as a hunter has the right to the pursute of happiiness.
7. This would eliminate the farming of sheep and goats in most of the state of Alaska. This would also limit our food production in which there is a severe shortage already.
8. As to the shooting of ferral cows. Can we get this lanuage cleaned up as to where you want to do this. Sometimes domestic animals do get loose but we the farmer have a great investment in that anmial and will look for it and find it.

Thank you for your time and consideration in this matter.

Sincerely

Lan Hecimovich

Submitted By  
Lee Hecimovich  
Submitted On  
3/4/2016 7:33:21 AM  
Affiliation

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Palmer, Alaska 99645

I am opposed to Propositions 90 and 91 for the following reasons:

Proposition 90: I have a BS in Wildlife Mgmt, MS in Education, am an avid hunter and livestock producer. This proposition makes no sense biologically or fiscally. I am familiar with wildlife diseases and the possibility of disease spread is nil. The potential extermination of all sheep and goats is huge is an agricultural industry already struggling. This would close down most farms as livestock producers are unlikely to want to deal with the paperwork, costs and government overreach. As a 4-H agent, I also work with many families who raise sheep and goats and this will shut them down statewide. We need our youth to be educated on agriculture and related issues, as well as the new generation of producers. Alaska is not food secure, this will further the problem.

Additionally, this makes no sense in a time of severe state financial problems; there is no funding for compliance. Many sheep and goat owners have 1-2 in their backyards and policing this will be a nightmare. Can you imagine the media attention when a young child sees his pet pygmy goat hauled away? This is just asinine, mainly driven to protect trophy hunts.

I am also against Proposition 91. Regulating "feral" cattle, just opens the door to additional regulations. Occasionally animals do get loose and creating an "open" season on them also makes no sense. Thank you

Submitted By  
Luetta Robinson  
Submitted On  
3/3/2016 9:21:57 PM  
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Proposition 90 and 91 are a hidden agenda to an end that is detrimental to livestock owners, 4 H clubs, 4 H children, small farming families, and the Alaskan economy. There is NO research or data stating a disease connection between domestic livestock and our precious Dall Sheep herds. Unless this is a way to collect revenues for permits, there is no logical reason for these propositions. Do not penalize innocent children and families for deep pocket political agendas. Alaska has always taken great pride in the independence and resilience of it's citizens, let's not pass something that would not only have a lasting impact, but curtail the ability of Alaskans to be independent and resilient.



Submitted By  
Marian Romano  
Submitted On  
3/4/2016 10:37:39 AM  
Affiliation  
private citizen

Please do NOT pass Prop 90 or 91 to remove goats and sheep from the clean list, nor take any action that prohibits, restrains or adds unreasonable costs to the farming and production of Alaskan domestic sheep and goat herders.

As a citizen who is concerned with food security in a state that imports 95% of its food, needs as much economic diversification as possible and as a chef/consumer who would like access to food that is not adulterated by the food industry I implore you to defeat this attempt to minimize or eradicate these domesticaed aimals, particularly without even the slightest evidence or study that the issue is relevant in our state.

Submitted By  
melissa reimers  
Submitted On  
3/2/2016 3:44:39 PM  
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please do not take sheep and goats off your clean list! there is no solid scientific reason to do so! also please do not add cattle to the feral category! no reason to do so there are none here in AK!

Submitted By  
Michelle Olsen  
Submitted On  
3/3/2016 9:31:47 PM  
Affiliation

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Palmer, Alaska 99645

Would you clear cut the entire state to prevent wildfires? Of course not.

Yet BOG is supporting a group who wants to remove sheep and goats from "The Clean List" to protect the wild sheep for hunters. But here's the rub: There is not a single case of wild sheep EVER getting sick from a domestic sheep in Alaska. The state vet says there is nothing to be gained by this process. There is no scientific evidence that this action will have any effect, good, bad, or indifferent, on the wild sheep.

A large majority of Alaskan farmers also hunt but since we live here we don't use the services of a guide. We know the area, we pick a place, pack up our gear and go. Now the Wild Sheep Foundation and the hunting guides that populate their board are proposing legislation that will drive the local farmers out of business.

The ramifications of Prop 90 are huge. WSF intimates that livestock owners can get a permit for the animals once they are removed from the clean list HOWEVER, if an animal is removed from the clean list, it is prohibited in the state, and Alaska code prohibits ADF&G from issuing a permit for ownership. If this passed, all sheep and goats would be immediately rendered illegal in Alaska.

What does this mean to Alaskans? No more fresh locally grown meat. No more locally produced goat milk soap and other body care products. No more cute animals at the fair. No more sheep or goats for 4-H, FFA, or any of the other programs that teach kids to farm. And no young farmers means as the old farmers retire there will be no one to grow our food.

So why is this even a thing? Well that's a great question. There is a substantial amount of money supporting Prop 90. However there is really no advantage for the hunters to be had. The domestic sheep are not grazing wild sheep habitat. There is not a single case of wild sheep coming nose-to-nose with a domestic sheep. There is not a single case of domestic sheep transmitting an illness to wild sheep. AND, the biggest kicker of all, wild sheep already carry what the hunters are accusing domestic sheep of harboring. That's right. The Wild Sheep Federation is all in a tizzy that domestic sheep will transmit pneumonia to wild sheep but the wild sheep already carry the pneumonia virus.

In light of that fact I ask you, what is to be gained by killing off and eliminating our local meat supply? Are the desires of the hunting guides (who serve out of state customers) really more important than Alaskan residents? What will happen when there is no local meat available? Where will our food come from? There aren't enough wild sheep to feed the whole state.

If there is a problem with livestock health and maintenance that is documented and supported by sound, scientific research, I, as a responsible farm owner, am more than happy to step up and help find a viable solution. Proposition 90 is a one-sided, poorly thought out document that achieves no measurable gain while completely destroying an entire industry in our state.

The sheep & goat industry is one cog in a complex agricultural system. We feed tons of spent grains from our local breweries to our animals keeping it out of the land fill. We support the hay farmers buying feed to keep our livestock thru the Alaskan winter. We supply fibers to local artisans for knitting and weaving. We supply locally grown meat & milk to our communities. Eliminating this industry will have a devastating, far reaching effect on Alaska.

The Wild Sheep Foundation has not engaged in any adequate level of collaborative, constructive, or honest conversation with any of the groups or state agencies that would be affected by the Proposal. Until recently, they have not met with the Department of Agriculture, ADEC or the State Veterinarian's Office, the Farm Bureau, or the roughly 1000 or more owners of domestic sheep or goats that would be negatively affected. They have not met with the Alaska State Troopers Wildlife Division to determine their ability to enforce this Proposal. Board of Game members are appointed by the Governor's office. Yet to date, this process has been anything but transparent! Yes, it was included in Board of Game Advisory Committee meetings apparently, but Alaskan residents that would be negatively affected had no reasonable knowledge that this issue which would be devastating to the small livestock community was being considered by the Board of Game. Perhaps it is time to replace Board of Game members with new members that respect the public process and ALL parties that will be affected. I have no malice against hunters. I object to government regulatory overreach and lack of adequate public process for all affected parties.

Submitted By  
Michelle Olsen  
Submitted On  
3/4/2016 3:15:59 PM  
Affiliation

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I want to express my extreme disapproval of Proposal 91 (Sean Lund's request to include cows in the definition of feral game). This is a thinly disguised attempt by Mr. Lund to make cattle rustling an allowable action, or at least an unpunishable offense. The obvious intended scenario -- a couple or three friends go to an area where cattle are grazing in a pasture. One stays out of sight while another opens the gate or cuts the fence and herds a cow or two outside of the pasture. That person then disappears while the other two butcher the cow and load it up, then they all go home and pat themselves on the back for getting a winter's worth of meat in their freezers with so little effort. Even if stopped and questioned, the first person can plead ignorance regarding the open gate, and the other two can say they were just walking along and saw and shot a feral cow.

If this piece of incredible stupidity were passed, cattle owners would have to either post a night guard or install extensive surveillance equipment and monitor it around the clock. Violence would be almost inevitable in the event of a confrontation between an owner and a would-be feral cow harvester (i.e. cattle thief). Raising large livestock in Alaska is fraught with enough challenges as it is, please do not add one more. Please TAKE NO ACTION on Prop. 91.

Submitted By  
Michelle Payne  
Submitted On  
3/4/2016 9:00:43 PM  
Affiliation

My name is Michelle Payne.

Together, with my husband Johnny, I run Wild Angels Ranch in the Butte area of Palmer. We purchased our 140 acre farm about a year and a half ago in order to save it from further development. Our property is near enough to the base of Pioneer Peak that we can see wild sheep on the mountain, with the naked eye, from our backyard. As part of our efforts to be self-sustaining AND to feed our community, we raise goats and sheep, amongst other livestock. We are already stretched as far as we can go financially just caring for our animals and maintaining their environment. Imagine our surprise, to find that the very folks that should concern themselves with Alaskans being able to feed themselves, are the ones seeking to limit our ability to do just that! There is absolutely no reason to impose further restrictions on the small farmers, producers and consumers in Alaska. Living on property that butts up to sheep habitat, we've learned one thing pretty well- the sheep don't come down here....and ours do not go up the mountain. The fact of the matter is that there is more danger from hunters tracking bacteria down off the mountain and into our fields than there is from wild sheep contracting something from an animal it never comes into contact with it. I have to wonder what ulterior motive there is, in an organization that cares little for the hardships that Prop 90 would impose on those of us who raise our own meat to eat. We believe that Prop 90 (and Prop 91) goes far beyond the reaches of the authority of the BOG and further, impose restrictions that make it impossible for this state to feed it's own citizens. We are vehemently opposed to it's passage. Thank you.

Submitted By  
Pat Udelhoven  
Submitted On  
2/29/2016 9:53:06 PM  
Affiliation

I know the decision is totally yours as far as the implementation of Proposal 90 & 91. Please consider the far reaching implications passage of this will have on 4H groups and all they learn, from raising their own critters to selling them at the local fairs. Food sustainability in Alaska is a "need" not a "want". Alaska has already had delays of 2 barages already in 2016, give us a fighting chance to have a choice in where our food comes from. Locally is suppose to be a good thing, for a myriad of reasons, please do not pull the rug out from under a lot of good well meaning people.

Thank you for your time

Pat Udelhoven

Soldotna, AK

Submitted By  
Penny Goodstein  
Submitted On  
2/29/2016 4:42:32 PM  
Affiliation  
Alaskan citizen

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Proposition 90: • The health of Alaska's Dall Sheep population is important. However, proposal 90 is too extreme. We have not had any hint of problems in Alaska.

- Our sheep and goat owners do not have free grazing rights. The animals are penned.
- Only areas directly in contact with Dall sheep should require permits. Dall sheep live up in the mountains. How many penned sheep/goats are really in proximity to Dall sheep?
- Have there been reductions in Dall sheep numbers? If so, have research biologists studied stressors such as weather, predation, avalanches, lambing, parasite load, age and nutrition?
- Are there plans for a livestock-wildlife working group to collaboratively work on issues such as this one/ instead of leaving the total decision to hunters?

Proposition 91- since when is COW a huntable animal? And what hunter would even want to admit to killing one? Cows are domesticated. If a hunter killed a cow, it probably walked right up to him/her.

Submitted By  
Sarah Henry  
Submitted On  
3/2/2016 1:53:32 PM  
Affiliation

Dear Board Of Game,

I am writing in response to Proposition 90. I have lived in Alaska since 1984 and have greatly enjoyed this state, it's beauty, wildlife, natural resources and the independent spirit of its residents. I have grown up hunting and respecting Alaska's wildlife as well as raising and caring for domestic pets and livestock. Both are a way of life for me and my family. Proposition 90, if approved, would take away and hinder that way of life.

Removing domestic sheep and goats from Alaska's clean list would be a devastating blow to Alaska's residents, agricultural community, economy and food security. There is a huge number of residents who rely on products or business from our local sheep and goat producers. Wool/fiber sales, meat and dairy consumption, 4-H programs, local feed and hardware stores, ATV and farm equipment dealers and hay, barley and oat farmers - these are many of the people and businesses that would be affected. Many, like myself, have multiple food allergies and dietary restrictions which is a large part of why we raise sheep and goats. Alaska has only a short supply of food if we were to get cut off due to a natural disaster. Our locally raised food would be a huge benefit and need if such a crisis were to occur. For many of us, taking domestic sheep and goats off of the clean list would have a huge impact to our health and livelihoods. Please remember that the clean list was created to provide a means of restricting exotic animals of concern from entering our state, not intended to restrict the possession of common domestic livestock.

I recognize the importance of being good stewards of our resources, both domestic and wild. The health of Alaska's Dall Sheep population is important, but proposal 90 is an extreme approach to deal with something that has not become an issue in Alaska. Alaska is not a free grazing state. Between fencing and natural barriers there is a low likelihood of close contact between wild sheep and domestic sheep/goats. The state already disallows use of domestic sheep and goats for purposes of packing into the back country in Dall Sheep habitat areas, for hunting or transport purposes. There has not been a single case of disease transmission in the State of Alaska between domestic livestock and wild sheep populations. There is no documentation of Dall Sheep deaths due to contact with livestock. Reductions in Dall Sheep numbers due to disease should factor in **multiple** stressors: weather, predation, avalanches, lambing, parasite load, age and nutrition. The bacteria of concern (*M. ovipneumoniae* and *M. haemolytica*) are endemic in wild and domestic populations - disease develops when immune systems become depressed.

There should be a livestock-wildlife working group formed to collaboratively work on issues such as this one. The Wild Sheep Foundation, funded in large part by outside hunting interests, have not attempted to work with the DEC which oversees the State's Veterinarian, the Department of Agriculture, the Farm Bureau or the state's livestock owners. They have simply filed a proposal with the Board of Game which will have devastating consequences to the interests of domestic sheep and goat owners in the state. And they understate the real ramifications of their proposal to the domestic livestock industry. There is time to approach this issue in a logical manner and form a plan that fits Alaska, without harming the livestock industry.

Proposition 90 is an extreme overreach of regulatory requirements. Not only is it a governmental overreach, but is out of the State's already deficient budget and opposed by many. The Department of Law has provided an opinion that the Board of Game and the ADF&G don't have legal authority to regulate domestic livestock. The ADF&G has advised the Board of Game to "Take No Action". In a recent statement the Alaska Wildlife Troopers stated, "Alaska Wildlife Troopers respectfully request the board recognize any new regulation or area restriction may result in additional burdens on Alaska Wildlife Troopers due to our limited resources, personnel and budget." The State Veterinarian, The Department of Agriculture and the Farm Bureau all oppose this action. Lastly, I and many other sheep and goat producers oppose this proposition and ask that you thoroughly look at the serious impact that this proposition would make on our state and take no action.

Sincerely,  
  
Sarah Henry





Submitted By  
Sarah Henry  
Submitted On  
3/4/2016 11:45:13 AM  
Affiliation

Dear Board of Game, I am writing in response to Proposition 91. I oppose this proposition and here's why. It is too vague and as it is written it sounds as if cattle rustling could easily become a problem. If someone's cattle escapes no one should feel free to help themselves to them. There are other options. Animal control can be called and many people already post to Facebook groups if they see a loose animal and are trying to get the word out so the owners can be located. That is the civil and neighborly thing to do...neighbors helping neighbors. Please take no action on Proposition 91.



Submitted By  
Stanley  
Submitted On  
3/3/2016 3:06:55 PM  
Affiliation

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Clarksville, Texas 75426

I strongly oppose propositions 90 and 91.

Submitted By  
Steve Runyan  
Submitted On  
3/4/2016 8:03:04 AM  
Affiliation  
assistant guide

Dear Board of Game,

I am commenting on proposals 90 and 91. Please take no action on 90, or vote unanimous against. It is a terrible proposal, with far reaching impact far beyond what it purports to address, which is transfer of disease from domestic animals to wild. Accordign to the department of law, the only authority you have on this issue is removal from the clean list. Removing sheep and goats from the clean list will do nothing to reduce wild sheep deaths due to stress, poor nutrition, and weather conditions. It will, however, place a large financial burden on anyone who would like to raise these animals, as they place approved fencing, testing, etc that would be required by the permit's conditions. That is if a permit to own them is made available. It will cost the state in time, manpower, money and other resources in this time of a 4 billion dollar budget shortfall. The studies done on disease transferral to wild populations were not conducted in Alaska, under Alaskan weather conditions and with Alaskan species. Many have been debunked, and some of the deadliest diseases are naturally occurring within wild populations, and manifest when the population becomes stressed due to overgrazing, overcrowding, or poor environmental conditions.

This proposal is an assault on personal liberty. We as Americans value our right to produce our own food, based upon the work of our own hands, not someone elses. This is a primary reason many people hunt, as well as raise livestock. To provide their own selves and families with healthy, organic meat, raised as God intended it. Goats and sheep are something which families with very limited resources and small properties, less than one acre, can raise successfully. I can personally attest to the value of raising a milk goat for personal dietary needs. My daughter's health can be attributed in large part to having a goat while she was an infant. The fencing requirement would have raised the cost and the spacial needs too high for us to have raised goats.

We as hunters have a responsibility to be good ambassadors for our passion and lifestyle. It can easily be taken from us if there is an upswelling of public support for the anti hunting agenda. There are proposals every year from groups and individuals seeking to close hunting of particular animals, entire species or areas. Passing this proposal will add small livestock owners to the list of people who are ill disposed toward hunters and their governing bodies. Please vote against this proposal and send a strong message to the legislature or DEC, who will likely see a version of this proposal, that this is a terrible idea.

Proposal 91 is similarly a bad idea. Livestock, especially large, heavy, powerful livestock like cattle, break out of containment. Listing livestock as feral game statewide could be devastating to farmers. Any cow found wandering on public land could be shot as feral, without an attempt to contact the owner and notify him his cow is loose. Please take no action on this proposal.

Sincerely,

Steve Runyan

Submitted By  
Suzy Crosby  
Submitted On  
2/29/2016 6:48:02 PM  
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[scrosby@ak.net](mailto:scrosby@ak.net)  
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Wasilla, Alaska 99687

I want to express my extreme disapproval of Proposal 91 (Sean Lund's request to include cows in the definition of feral game). This is a thinly disguised attempt by Mr. Lund to make cattle rustling an allowable action, or at least an unpunishable offense. The obvious intended scenario -- Mr. Lund and a couple of friends go to an area where cattle are grazing in a pasture. Lund stays out of sight while the friend opens the gate or cuts the fence and herds a cow or two outside of the pasture. The friend then disappears while Lund shoots the "feral" cow. He and the other friend butcher the cow and load it up, then they all go home and pat themselves on the back for getting a winter's worth of meat in their freezers with so little effort. Even if stopped and questioned, friend # 1 can just say he didn't realize the gate was open (or needed to be shut), and friend # 2 can say they were just walking along and saw and shot a feral cow.

If this piece of incredible stupidity were passed cattle owners would have to either post a night guard or install extensive surveillance equipment and monitor it around the clock. Violence would be almost inevitable in the event of a confrontation between an owner and a would-be feral cow harvester (i.e. cattle thief). Raising large livestock in Alaska is fraught with enough challenges as it is, please do not add one more. Please TAKE NO ACTION on Prop. 91.

March 3, 2016

Dear Board of Game:

I am writing to express my intense opposition to Proposal 90, and I ask you to follow the advice of the AK Dept. of Fish and Game, the AK Dept. of Law, the AK Division of Ag, and the AK Farm Bureau and TAKE NO ACTION on this proposal.

The author of Proposal 90 is asking you to remove domestic sheep and goats from the so-called "Clean List", for the purported reason of taking "preventive" measures to avoid contact and/or disease transmission to wild sheep. He proposes a "simple" permitting process to allow goat and sheep owners to continue to own their livestock. However, according to the ADF&G, animals which are not on the clean list CANNOT BE issued a permit, and would simply become illegal to own, buy, sell, import, or export. It is estimated that there are over a thousand sheep and goats in south central Alaska, providing their owners with milk, meat, fiber and in many cases, income. Some are 4-H projects, and others are beloved pets and companions. To date there has never been a single documented case of disease transmission between domestic and wild stock. The extreme terms of this proposal are an example of appalling government overreach, and its passage would have a devastating impact on the lifestyles and livelihoods of hundreds of Alaskans, including the feed stores, hay farmers, veterinarians and others with whom the owners do business. Those who depend on fresh goat's milk per doctors' orders, or as the only milk which they or their children can digest, would be particularly hard hit.

The proposal goes on to say that once permitted (an impossibility under Alaska's existing law), owners within 15 air miles of Dall sheep "habitat" would be required to build a "department-approved" secondary fence with a 30 to 50-foot buffer to prevent contact between livestock and wild sheep. Under these requirements, a seemingly spacious one-acre pasture would be reduced to a narrow alleyway in the midst of an unusable no-man's land. Because sheep and goats are so adaptable to smaller spaces and even backyards, that restriction alone would eliminate many owners' ability to keep their animals at all, due to not having enough acreage, let alone the capability for building such a fence.

Another restriction called for by the proposal is testing for diseases which are not even on the WSU's (Washington State University -- the lab most heavily used for testing both domestic and wild sheep) list for domestic animals. Research has definitively proven that both of the infective agents (*M. hemolytica* and *M. Ovipneumoniae*) that have been associated with the pneumonia that has caused bighorn sheep die-offs are endemic ( i.e., naturally occurring) in both wild and domestic sheep and goats, with disease outbreaks most likely to occur when the animals are under added stress due to weather, predation, age, and poor nutrition.

Unlike the Rocky Mountain States where huge commercial herds are free grazing on public lands with potential contact with Bighorn Sheep, the majority of Alaska's domestic sheep and goats are located many miles from wild sheep populations and virtually all are living inside fenced pens. The notion of accidental contact is utterly ludicrous due to the numerous impassable barriers such as oceans, rivers, highways, towns and subdivisions. Until there is proof that Dall sheep are swimming across Knik Arm or the Matanuska River, or crossing Wasilla's sprawl of highways, houses and strip malls to gain access to local livestock this proposal needs to be seen as the arrogant and self-serving hogwash that it is. If passed it would provide no guarantee of improved health for wild

herds, while meantime devastating an entire community whose lives are intertwined with and dependent on their animals.

Besides causing a severe economic burden to Alaskan sheep and goat owners and the businesses that provide feed and care for them, the passage of Prop. 90 would also have significant cost impacts to the State of Alaska. whose nearly \$4 billion budget shortfall is forcing lawmakers to choose between cutting essential services, instituting a state income and sales tax, and reducing or eliminating the Permanent Fund Dividend program. The last thing the state needs is a new regulatory compliance program to administrate, for the sake of avoiding a hypothetical crisis that has neither occurred, nor been proven to likely occur in the future. It is both irrational and unreasonable to apply out-of-state parameters . Any valid risk assessment whose findings are to be used in Alaska must be done in Alaska, taking into consideration the unique terrain and topography, and adhering to standards set by the National Academies of Science.

Finally there is the matter of the personal freedom of private citizens to raise their own food on their own land. At no time or place in the history of our nation has there ever been a measure imposed on any segment of the population that would so drastically impair the capability of families to provide for their own needs. The passage of this proposal would set a disturbing precedent that could be used to push even more restrictive measures elsewhere, or with other livestock species.

Alaska's food supply is tenuous at best, and extremely vulnerable to any interruption in service. Our government should be encouraging more residents to take steps toward self-sufficiency rather than standing in the way of those who are already helping to provide food for themselves and their neighbors. The fact should not be overlooked that in any food emergency caused by a break in the supply line these domestic animals would provide a short-term food supply and a buffer against poaching.

I ask you to not pass Proposal 90 due to the severe impact it would have on individual domestic goat and sheep enthusiasts and small farm operations. The Proposal has not been well vetted, it is fundamentally flawed in its underlying assumptions and proposed requirements, and there has been a blatant and deliberate disregard for public process. Neither the State nor individual livestock owners can afford to comply with the burdensome requirements of this proposed program.

Please heed the counsel of other state agencies (ADF&G, DOL, Division of Ag, and the AK Farm Bureau) and TAKE NO ACTION on Proposal 90.

Thank you for your consideration.

Suzy Crosby

Submitted By  
Taryn Holmes  
Submitted On  
2/29/2016 6:43:56 PM  
Affiliation  
  
20 February 2016

Beliefs have consequences. The Wild Sheep Foundation (WSF) is asking Alaskans to believe that a pneumonia outbreak among Alaskan wild sheep is imminent. Yet, in Kevin Kehoe's (president, WSF) words, "Although the threat is real, there is no evidence that the current reduction in Alaska's Dall sheep population is due to widespread pneumonia" (Alaska's Wild Sheep Need Proactive Protection From Pneumonia, Alaska Dispatch News, 2-11-16). Studies released from the Alaska Department of Fish and Game (ADFG) indicate predation, avalanche, and starvation are leading causes of death among Dall's sheep in Alaska.

The exact cause of pneumonia-related die-offs among wild sheep in other states has not been scientifically determined. Researchers agree that ruminant pneumonia is a complex disease with a multitude of factors, including stress. Not all animals, wild or domestic, that carry strains of respiratory bacteria, including major strains of pneumonia, actually *have* pneumonia. These strains of bacteria are endemic to all small ruminants in North America; they are found in *both* wild and domestic sheep, *including* Dall sheep populations currently in Alaska. There also remains no documentation of direct contact between wild and domestic sheep or goats in Alaska. Should we then take hurried measures to prevent a perceived crisis, based on assumptions made without applying a broad spectrum of science?

The WSF claims that studies indicate transmission has occurred between domestic and wild sheep and repeatedly cite *transmission* as a cause. Yet, neglect to mention how many of these studies were WSF funded and conducted under experimental conditions. To infer that research proves pneumonia transmission between domestic livestock and wild sheep when there is scientific, third-party evidence to imply otherwise is misleading. Professor Mark Thurman, DVM, Professor Emeritus Veterinary Infectious Disease Epidemiology, UC, Davis states, "...we cannot say that diseases like pneumonia are 'transmissible' because they are caused in part by factors that are themselves not transmissible, such as weather, stress, nutrition, etc. Attempts to model complex diseases, like most respiratory diseases, as transmissible events would illustrate a lack of understanding of disease pathogenesis and epidemiology." (Predictive Models in Policy and Decision Making 5). There has not been a fair representation of this scientific data at the local Alaskan forums concerning this topic.

The WSF is calling for the AK Board of Game to "Eliminate domestic sheep...and goats...from the "Clean List" and require a permit for possession with stipulations if located within 15 air miles of all sheep habitat" (ADFG Proposal 90); an unjustified, sweeping action that will restrict Alaskans from possessing, importing, exporting, buying, selling, or trading sheep and goats without an ADFG permit; an action that would have long-term detrimental effects not only on the genetic diversity of Alaska's domestic livestock, but on hobby farmers and the agricultural economy throughout Alaska. Due to diverse geography and the already high expense of raising livestock, sheep and goat farming in Alaska would not likely recover from such severe control in the name of resource management.

The AK Board of Game is involved "with setting policy and direction for the management of the state's *wildlife* resources..." (ADFG). Requesting a government agency to manage *private property* is an unsubstantiated measure and this blanket course of action would establish a detrimental precedent for the ADFG to regulate domestic livestock. A large portion of this proposal appears to reach dangerously beyond the scope of the AK Board of Game's management requirements to adopt regulations as described in AS 16.05.255 Sec. 16.05.255. (Regulations of the Board of Game).

In a recent opinion article, Kevin Kehoe expressed the WSF's intention to pursue domestic livestock regulation, "Whether via regulatory mechanisms through the Alaska Board of Game or legislative means via Alaska's Legislature..." (ADN, 2-11-16). Proposal 90 has not been well-publicized and Alaskans have the right to know of and respond to a proposed policy that would effect generations to come. By pursuing Proposal 90 or related legislation, the WSF will not be creating an opportunity for genuine collaboration with the Alaskans that would be directly effected, but will be forcing livestock owners to take a defensive stand to protect what they already know to be a sustainable investment. This proposal will not allow Alaskans to maintain traditional agricultural practices and according to scientific data, may not likely protect wild sheep from a pneumonia outbreak. An overzealous foresight to draft unnecessary prevention plans is actually shortsighted. There are other ways to achieve a truly collaborative effort in what is already a mutual goal.



Livestock owners in Alaska are not just farmers, they are wildlife conservationists, scientists, naturalists, photographers, sportsmen, hunters and trappers. They understand the complexity of disease prevention as they strive to respect wildlife while operating responsible, bio-secure farms to protect their own livestock. Instead of rushing into regulatory or legal propositions, a stronger approach is for the WSF and ADFG to learn from the agricultural producers what they already know about disease and ways they are already implementing safety precautions for their herds and the wild populations. The WSF will find many producers employ voluntary health screening, predator-proof fencing, Livestock Guardian Dogs, and go to great lengths to keep their herds healthy.

If the WSF would withdraw Proposal 90, and instead invite agricultural representatives to the table for an honest, collaborative effort, there is a chance to diffuse the divide that is already escalating. An alliance would be much more valuable. The end result could be beneficial for all Alaskans and the wildlife and livestock we seek to protect. An agricultural representative on the ADFG Dall Sheep Working Group could be a crucial step in this direction. Alaska would become a model for other states to follow, instead of one more example of what citizens are quickly labeling, government overreach. Alaska's unique habitat calls for a variety of effective methods to maintain and improve animal health. There is time to respectfully build a working relationship between all Alaskans who advocate science-based management.

Alaskan agricultural producers and hobby farmers will continue to demand WSF and ADFG uphold scientific integrity. The WSF claims they are advocates of science-based wildlife management. Yet, there is a preponderance of scientific evidence that clearly supports pneumonia among wild sheep is not fully understood and that direct interaction between ruminants, wild or domestic, does not invariably result in disease. Only the best available science should be utilized to formulate wildlife and livestock management policies, and the time should be taken to do so.

Inadequate research is bad science, and science without critical analysis creates fallacious reasoning, ultimately ending in bad policy. There's no justification to change the way Alaskans maintain food independence based on speculation that would have long-lasting consequences on Alaska's agricultural sustainability. The WSF now has the opportunity to be proactive and show Alaskans that they will actually take the time to seek collaboration and fair representation, uphold scientific integrity, and indeed support multiple-use resource management.

cc: Kevin Kehoe, President AK Chapter WSF

Submitted By  
Taryn Holmes  
Submitted On  
3/4/2016 8:24:57 AM  
Affiliation

Please vote **NO** on Proposal 91. Feral domestic animals are already defined as "game" (19).



Submitted By  
James Ingram MD  
Submitted On  
2/19/2016 11:48:59 AM  
Affiliation

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**PROPOSAL 92 - 5 AAC 92.037. Permits for falconry.** Modify the allocation provisions for nonresident falconry permits.

I am in support of Proposal 92-5

A harvest of any animal should be based on science not politics. The species of animals currently harvested in Alaska is consistent with this principle with few exceptions.

The following are facts related to the raptor take by falconers:

1. Falconers only take juvenile ( 1st year ) raptors because they have a 50-70% mortality in the wild. Thus the survival of the individual bird taken is improved.
  2. A raptor taken while in the nest( eyas) improves the survival of the other siblings that remain in the nest.
  3. USFWS studied raptor harvest by all falconers nationally over several years and found that there was **zero impact by falconry take on raptor populations.**
  4. The raptors utilized in falconry are non threatened and non endangered species and are classified as species of least concern by the IUCN red list and Birdlife international.
  5. Peregrine falcons in particular, were removed from the endangered species list in 1999( 17 years ago ) and the IUCN states:
    - This species has undergone a large and statistically significant increase over the last 40 years in North America (2,600% increase over 40 years, equating to a 127% increase per decade; data from Breeding Bird Survey and/or Christmas Bird Count: Butcher and Niven 2007). Note, however, that these surveys cover less than 50% of the species's range in North America"
1. The USFWS EA on peregrines showed that in 2003 Alaska had more nesting pairs then the entire contiguous western U.S.
  2. Based on 2003 population data ( over a decade old, which now may be 100% higher) the USFWS study diagramed a safe harvest which showed that Alaska was allowed a take quota of 44 peregrines with 11 other western states total allowable take of 57, which totals 101 juvenile peregrines.
  3. According to USFWS, Alaska supports the entire US population of breeding Gyrfalcons. Thus if an falconer wants an eyas Gyrfalcon, Alaska is the **only place** for an American citizen to obtain one.

The USFWS has no quotas on the number of raptors that falconers are allowed to take nationwide. The same applies to the individual states as well as Alaska for resident falconers. There is one exception, the peregrine falcon. This exception is not based on science, but politics, because the peregrine falcon populations are huge and probably bigger than other raptor species utilized for falconry.

**Texas should be a model for Alaska** in regards to raptor take by falconers both resident and nonresident. Texas is less than half the size of Alaska ( 40% by square miles). Texas has 220 resident falconers, probably 10 times the falconers that Alaska has. Texas law is consistent with federal law and has no restrictions or quotas on the species of raptor harvested by falconers, except the peregrine. The law allows for only harvesting juvenile raptors, and species consistent with the falconers license. Falconers are only allowed to take 2 wild raptors in any 12 month period. The only quota in Texas is the peregrine, which USFWS has allowed a take of 10 juvenile birds per year. Each year, in Texas, the entire allowable quota is harvested by both resident and nonresident falconers. In addition, there is no restriction on the number of nonresident falconers who have access to Texas raptors. Nonresident falconers abide by the same state harvest laws



as resident falconers. In Texas, with no nonresident restrictions, each year approximately 4 peregrine falcons and 10 other species of raptors are harvested by nonresident falconers, a total of 14 birds. The majority of US falconers have easier access to Texas than Alaska, and these numbers prove that the small numbers of juvenile raptors harvested will have no impact on raptor populations. This fact was proven on a national scale by USFWS by Allen and Milsap, Final Environmental Assessment: Take of Raptors From the Wild Under the Falconry and the Raptor Propagation Regulations, USFWS, June 2007. Also, between 8 and 10 resident Texas falconers help and assist nonresident falconers to be successful in their attempts to harvest.

It is safe for Alaska to harvest the maximum number of peregrines USFWS allows. It is also safe for Alaska to allow a non resident falconer to take raptors under the same conditions as Alaska falconers. Legal raptor harvest by nonresident falconers will benefit Alaska financially just like other nonresident hunters and fishermen do when they come to Alaska.

February 23, 2016

Alaska Board of Game  
Attn: Kristy Tibble, Executive Director  
Address: P.O. Box 115526 Juneau, AK 99811-5526  
e-mail:kristy.tibble@alaska.gov

Subject: Proposal to increase the allowable harvest of raptors by nonresident falconers

I have read the American Falconry Conservancy's (AFC) proposal to allow an increase in the allowable take of raptors by non-residents and I am writing this letter in support of their proposal. I am a licensed falconer of over 25 years. I was excited to hear that Alaska finally allowed take of raptors by non-residents last year. I was very disappointed to hear that the Alaska Board of Game authorized such a minimum number of raptors to be taken by non-residents. I was disgusted to learn that the Alaska Department of Fish and Game reduced that already minimal number with what they viewed as administrative discretion. The set limit of 3 raptors allowed to be taken by non-residents is not supported by any biological measure.

This proposal to modify existing Alaska provisions regulating nonresident harvest of raptors has been presented by AFC in order to ensure reasonable access to a healthy resource and provide equal opportunity for all interested parties. I have an in depth knowledge regarding the biology, conservation concerns, and natural history of raptors in North America. I served as Program Director of the Teton Raptor Center for five years and have held positions at other zoological facilities involving raptor care and conservation for more than a decade. I believe that the proposal put forward by the AFC is biologically supported and a very conservative request for access to a plentiful wildlife resource in Alaska. I am also an attorney and believe that the proposal presented by AFC is legally supported by the principles of wildlife management and access which the Alaska Board of Game utilizes in evaluating take of wildlife in all other arenas.

I look forward to seeing the recommendations of the proposal incorporated into take allowances in the near future.

Sincerely,



Jason C. Jones  
PO Box 1101  
Wilson, WY 83014

Submitted By  
Lars Sego  
Submitted On  
2/22/2016 11:59:37 AM  
Affiliation  
Master Falconer

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Albuquerque, New Mexico 87109

**PROPOSAL 92 - 5 AAC 92.037. Permits for falconry.**

**I support the proposal for non-resident eyass falcon take in Alaska.**

**I am an avid lifelong master falconer and have been to Alaska several times previously to hunt and fish in your beautiful state. I have spent tens of thousands of dollars in your state's economy on; guides, lodging, food, airfare, bush pilots, gear, etc. I would like to do the same to take an eyass Gyr falcon at some point in the future. Due to the time and expense required for such an undertaking, it takes planning and preparation but there is no need to start the process unless we know that Alaska has some sort of system in place to issue non-resident eyass take permits even if it is a draw.**

**I would like to come and take an eyass gyr falcon from Alaska in the future if and when you open your state up to non-resident take for the same.**

**We have non-resident take in New Mexico and I have helped other falconers from out of state, when they have proper permits, to take eyass birds from NM. It is good for the states economy to have such a policy. I hope that Alaska would participate in kind with reciprocity for falconers from states that allow non-resident eyass take for falconry.**

**Sincerely,**

**Lars Sego**

Submitted By  
Todd Duffin  
Submitted On  
2/23/2016 2:18:10 AM  
Affiliation

February 23, 2016  
Alaska Board of Game  
P.O. Box 115526 Juneau, AK 99811-5526

Subject: Proposal to increase the allowable harvest of raptors by nonresident falconers

I am writing this letter in support of the American Falconry Conservancy's (AFC) proposal to allow an increase in the allowable take of raptors by non-residents. I have reviewed the proposal by AFC and the requested allowable take limits they have included in the proposal. I agree with their recommendations and reasoning. I believe that non-resident falconers have not had a fair access to the raptors of Alaska. It also appears that access to this resource has been limited for reasons not supported by science or conservation principles. I have been a falconer for 20 years and have never had the opportunity to take a wild Gyrfalcon but would like to. Alaska is the only state in the U.S that can provide access to nesting Gyrfalcons. It seems unfair that residents of AK have unlimited access to this resource and the remaining residents of the U.S. are excluded completely.

I support the AFC proposal to increase allowable non-resident take of raptors and hope the Board accepts their recommendations.

Thank you,  
Todd Duffin

Submitted By  
Alaska Falconers Association  
Submitted On  
3/3/2016 9:39:54 PM  
Affiliation  
Alaska Falconers Association

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Mr. Ted Spraker, Chairman

Alaska Board of Game

March 3, 2016

Board of Game Members,

For nearly forty years, the Alaska Falconers Association has been the voice of practitioners of this ancient art in the far north. No other group has so consistently advocated for falconry and for the health of the populations of wild raptors and their quarry. The current suite of regulations that are detailed in the Alaska Falconry Manual #9 is a result of the hard work and cooperation between the Alaska Falconers Association, the Alaska Department of Fish and Game, and the Board of Game. This set of regulations is a perfect example of Alaska's system of wildlife management working for the benefit of the wild raptors and the falconers who practice the art of falconry. We are grateful for the opportunity to comment on this year's Statewide Cycle B proposals.

While there are a number of reasons to avoid changing the non-resident raptor take scheme, we believe the most significant reason is that "it is simply too soon to do so at this time". **The Alaska Falconers Association opposes Proposals 92 and 93.**

Just last year, following a multi-year discussion brought on by an Outside proposal involving considerable public testimony and lengthy deliberation, the Board crafted a non-resident raptor take system. The new program was the first-ever foray into the realm of non-resident raptor take in Alaska's history. Our group had never before seen a falconry proposal so complicated or controversial as to stretch across multiple Board deliberation cycles. There were many details to consider and a frustrating lack of solid scientific information to inform the discussion. But the Board thoroughly examined all the angles, listened to wide-ranging public testimony, and carefully, and conservatively built a new permitting system.

That new system has been in place for not quite one full annual permitting cycle. It is not time to start the conversation all over again, especially to expand take from passage birds only into the complex and contentious world of taking eyasses. There are many aspects of eyas take that carry ramifications that are worthy of judicious consideration.

We believe the new system should be allowed to stand unaltered long enough to establish a baseline of non-resident interest, follow-through, and rate of success. When trend lines begin to emerge, the Board may or may not decide to discuss changing the system it created. But one cannot establish and assess a trend from a single data point, and that's all we have in 2016.

Whether the object of desire is a raptor, a bison, or a Dall sheep, it's a safe bet Outsiders will always want more permits. We urge the Board to resist changing regulations just because non-residents want more. Scientific data and reasonable, legal apportionment between residents and non-residents should rule the day. In instances where one or both are unavailable or difficult to determine, we urge the Board to act deliberately and conservatively, as it has in the case of non-resident take of Alaska raptors. We have a hard-fought system in place. Let's leave it alone for a while and see how it works.

If the Board were to make any changes at all, we recommend making a regulation prohibiting or at least issuing a clear statement opposing guiding non-resident falconers for pay. Without a detailed system of establishing competence, issuing permits, and monitoring permittees and their activities, guiding for pay creates a financial incentive to remove raptors from the wild, and all the attendant problems that brings. You know how complex Alaska's big game guiding business is. There is interest in raptor guiding, which is ill advised for a lot of reasons. At minimum, no guiding should be allowed without first going through the rigorous examination and public discussion that surrounds the big game system. If an Alaska falconer wants to help a non-resident friend trap a passage raptor, fine. But it should not be legal to hire oneself out to a paying customer, certainly not without a detailed Board discussion about all that entails.

Thank you for considering our views.

Sincerely, William R. Tilton, President  
Alaska Falconers Association

Submitted By  
Dale Hall  
Submitted On  
2/23/2016 3:04:06 PM  
Affiliation  
Mr.

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Soldotna, Alaska 99669

Respectfully,

I am a 35 year resident and Master Class Falconer, My children have been born and raised here in the State of Alaska.

**I am for not for Propsals 92&93!!**

I am not for changing anything to the FALCONRY Regulations at this time, ,I would like to remind the Board that the state was going to ease into a NRT to see how it worked out for all. Doubling, tripling, or completely opening up take without limits in the second year is far from conservative.

I also have a question for the Board, Whats wrong with just Alaska Residents being the only ones to have access to Eyasses Falcons? We live here all year round. Why can't we have a small privilege to be the only ones to harvest Eyasses Falcons in Alaska?

I would also like to see the Board take Falconry Regulations every 6 or 8 years instead of changing everything so often.

If the Board is going to change things again, I would like to see a NON-RESIDENT pay 2500.00\$ to 3000.00\$ for a permit.This may seem high, But, I will bet you, will sell everyone.

Please leave the Regulations the way they are for now.

Thank you

--Dale Hall--

Submitted By  
Eric Fontaine  
Submitted On  
3/4/2016 2:08:19 PM  
Affiliation

Dear Alaska Board of Game Members,

My name is Eric Fontaine. I am a Master Falconer and a 51-year Alaska resident living in Anchorage. I was raised in Alaska; attended public schools here, and graduated from college here. I now raise my own family here. I have been a lifelong hunter and fisherman. I submit this letter to the Alaska Board of Game (Board) with written comments pertaining to **Proposals 92 & 93**.

**Please reject Proposals 92 & 93.**

Proposals 92 & 93 seek to significantly increase the take of wild raptors in Alaska by nonresidents for falconry purposes. Two years ago The BOG passed the very first raptor take by nonresidents in Alaska. At that time a conservative philosophy of allowing up to 5 post fledgling (passage) birds was adopted. No chicks were to be taken from the nest. ADF&G used their discretion and further restricted the take to 3 passage raptors for the purpose of evaluating demand and possible impacts. In 2015 there were 23 nonresident applications submitted for the 3 permits. This high number of applications demonstrates the demand and potential pressure that could be placed on this resource. After a single year of take, Proposals 92 & 93 seek to not only more than triple 2015's take, but to allow the take of nestlings. A single year of take does not provide sufficient background to justify such an increase at this time.

Of primary concern in taking nestlings is the repeated take at specific nest sites. Gyrfalcons and peregrine falcons are particularly vulnerable because they use traditional locations for nesting. These are frequently geologic formations that have existed and been used for breeding/rearing sometimes for centuries. Alaskan falconers have a history of sparingly removing nestlings so excessive pressure hasn't impacted any breeding pairs' site fidelity (abandonment). If Proposal 92 or 93 are adopted this could change. Both of these proposals seek to take more birds each year than Alaska's falconers have ever taken in any year. I'm also concerned that nonresident falconers may visit and revisit traditional sites excessively with detrimental effects on the breeders. This situation could be exacerbated by the sharing of information such as GPS coordinates through social media because falconers, both nationally and worldwide, are very well connected. Additionally, some historic nest sites are much easier to travel to and others are much easier to climb into making them more attractive destinations for take.

I could support a take of nestlings and a modest increase in the number of take permits by nonresidents if adequate protections for the resource were incorporated into a proposal. Neither of these proposals have such protections so I respectfully urge the Board to reject Proposals 92 & 93.

Thank you for your time and the opportunity to comment.

Sincerely,  
Eric Fontaine



Submitted By  
Gary Hampton  
Submitted On  
2/29/2016 3:28:31 PM  
Affiliation

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Address  
PO box 83292  
Fairbanks, Alaska 99708

Dear BOG,

My comments are directed at proposals 92 and 93.

First non residents should never have the same falconry privileges as Residents.

Second I do agree to a five bird passage take and a five bird eyes take for non residents.

Third , sensitive nesting areas for eyes take for non residents should be off limits.

Thanks

Gary Hampton

March 4, 2016

**I strongly oppose both proposals 92 and 93.**

This is in response to proposals submitted to the Alaska Board of Game.

**I vote to maintain the status quo, allowing a nonresident take of 3 passage birds only. Do not expand non resident take at this time.**

The push for opening non-resident eyass take in Alaska is to primarily gain access to the gyrfalcon. However, there has been a reported history of several AFC officers, founders, associates, and other nonresidents conducting or attempting illegal falcon take in Alaska. There are reports of several nonresidents having come to Alaska and conducting illegal take and smuggling of gyrfalcons. The lack of stewardship for the resource as demonstrated by nonresidents has great potential to adversely impact this limited resource.

My opposition to proposals 92 and 93 are because the issues are wrongly *presented as allocation issues*, **but in fact proposals 92 and 93 are conservation issues**. The take or harvest of eyass nestling raptors is much different than other forms of hunting, and fishing harvests. The birds are restricted to one square meter of habitat during the eyass take season and known nest sites are potentially repeatedly disturbed and the young removed. With the limited population of certain genetic morphs of gyrs, and history of nonresidents harvesting illegally regardless of the law, gyrs may be adversely impacted by nonresident harvests. Current proposals will more than double the present gyr falcon take.

**When just last year the first nonresident passage gyr season took place, it was agreed that we would advance cautiously to study the effects and impacts to the resource and identify enforcement issues.**

**This is why I feel we should maintain the status quo, since only one harvest season has occurred and we need to proceed cautiously in giving nonresidents access to the resource. Proposals 92 and 93 more than double the rate of resident harvest of the past 25 years.**

Sincerely,

**Kurt Schmidt**





Submitted By  
Lee Merrick  
Submitted On  
3/4/2016 4:27:18 PM  
Affiliation

I would encourage the board to not approve proposals 92 and 93 regarding non resident falconry take.

Submitted By  
Paul Stitt  
Submitted On  
3/3/2016 10:22:45 AM  
Affiliation

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Address  
PO BOx 80231  
Fairbanks, Alaska 99708

Regarding any proposed modifications to extant non-resident falconry permitting procedures:

As a practicing falconer in the state of Alaska, I support no additional changes until such a time there can be a demonstrated year over year record of regulatory success upholding the **current and still new**, non-resident take falconry regulations. At that time it can reasonably be determined whether or not adding to the legal take limit for non-residents is in the best interest of the resource and sustainable from a regulatory point of view.

I do not support either permit proposals 92 or 93.

Submitted By  
Randall Compton  
Submitted On  
3/4/2016 9:40:59 AM  
Affiliation  
Alaska Falconers Association

As a practicing falconer for the past 47 years I support no additional changes until there can be demonstrated year by year a record of regulatory success upholding the new non-resident take falconery regulations.

At that time it can reasonably be determined whether or not adding to the legal take limit for non-residents is in the best interest of the resources and sustainable from a regulatory point of view.

I therefore do not support either permit proposals 92 or proposal 93. Regarding non-resident falconry permitting regulations:

## Proposal #92

Public comments for the additional number of raptors taken and access to eyass (chicks still in the nest) raptors being trapped for Non- Resident Take (NRT) by outside falconers.

I am strongly opposed to proposal #92

As an Alaskan Master Class falconer and one of the few Alaska licensed raptor propagators, I believe this issue is the most heated item inside the falconry community and the most important issue the Alaska Board of Game has ever had to address regarding the raptors of Alaska. Approximately only 1/10 of the residents falconers are for the NRT proposal #92. The other 9 out of 10 Alaskan Falconers are opposed to this proposal. For those of us who have lived there lives with such a high commitment surrounding the raptors we love I could write pages on the subject. However I will attempt to be brief in my comments.

Biologically there is much evidence that the population would not be effected on a passage (birds that have already left the nest and are hunting independently from their parents) bird take at all. I would have no reason to object to a NRT for passage birds no matter what the number was. Papers have been written and plenty of documentation supporting there is no impact on the wild population of raptors from the falconry community. With mortality rates on first year birds in the 80%+ this would be a worth while endeavor to actually decrease this mortality rate by the falconry community. However the trampling of the gyr falcon nest sites in western Alaska is or great concern to me and should also be to the biologists here in Alaska.

The falconers of the world have a grand prize that all of them wish to obtain at some point in their falconry career. This is the white gyr falcon. There are few places in the world that support a wild breeding population of these birds. In the USA Alaska is the only place that has this resource. In the past falconers from the lower 48 have come to Alaska to harvested white gyr falcon chicks from nest sites, specifically out of western Alaska under legal and illegal means. Yes we already have had poaching and smuggling of Alaska gyr falcons. There is a huge interest in non-residents to obtain gyr falcons this is undisputable. It is my understanding was last year (5) permits were allowed for passage birds to be trapped by non-resident falconers and 23 falconers from outside applied for these permits. Of these 23 applicants I understand 1/3 of the applicants were non-resident propagators wishing to increase their genetics strains. I know of at least one large raptor breeders from outside who was in Kotzebue last breeding season performing a gyr falcon recon mission.

This resource needs to be protected as it is the only place in the USA that has a wild breeding stock of gyr falcons. A miscalculation or a trail period for allowing non-resident falconers to enter the gyr falcon nest sites could cause devastating results to this fragile

resource. Several points I would like to make in consideration of not allowing this proposal to be accepted are as follows:

1. The opening up of non-resident take for Alaska *passage* raptors was from my understanding a temporary situation that would be reviewed in the future for possible changes after there was data to be reviewed. The only review we have from this last year. This is hardly enough data to draw from to make any changes to the NRT.
2. The non-resident falconer has the ability through the current regulations to obtain a gyr falcon through trapping a passage bird. I have a picture of one of these birds that was trapped last year and it was a nice white bird. So the non-resident falconer who desired to white gyr falcon can obtain one through the existing regulations without the danger of them disrupting the fragile nest sites.
3. Fragile and desired resources have always been protected by the Department. Bison and Musk Ox hunts for example have always been coveted by the hunting community. As we see in the regulations there are no non-resident Musk-ox hunts available in the Nome area. Bison hunts for non-residents are a "once in a lifetime" permit. Very restrictive guidelines have been put into place for these coveted hunts and resident hunters have always have had a higher percentage chance to obtain these permits compared to the non-resident. I would suggest this same philosophy be instituted for raptor take in Alaska. No nesting bird take be allowed for Non-residents.
4. As an x-Alaska State Trooper I understand the difficulties of attempting to patrol bush Alaska. The areas that the nest sites are located in the Seward and Lisbourne Peninsulas and have no observable law enforcement. With the limited resources the State has with a budget crunch that we have not seen in decades there will be further demands on law enforcement to spend their patrol dollars wisely. Having a brown shirt Trooper fly the nest sites on patrol out of Nome and Kotzebue is not going to happen. Open this resource for NRT and you will have a free for all with no oversight.

Again to summarize I would ask that all nest site NRT not be allowed to protect this fragile resource that cannot recover from the kind of issues that could occur if non-residents were allowed to access the nest sites. I would have no problem with an unrestricted take of passage birds for NRT.

Thank you for your consideration on this extremely important issue.

Steve Bergh  
18727 Old Glenn Hwy  
Chugiak, AK 99567



## Proposal #93

Public comments for the additional number of raptors taken and access to eyass (chicks still in the nest) raptors being trapped for Non- Resident Take (NRT) by outside falconers.

I am strongly opposed to proposal #93 for the same reasons I oppose proposal #92.

As an Alaskan Master Class falconer and one of the few Alaska licensed raptor propagators, I believe this issue is the most heated item inside the falconry community and the most important issue the Alaska Board of Game has ever had to address regarding the raptors of Alaska. Approximately only 1/10 of the residents falconers are for the NRT proposal #92. The other 9 out of 10 Alaskan Falconers are opposed to this proposal. For those of us who have lived there lives with such a high commitment surrounding the raptors we love I could write pages on the subject. However I will attempt to be brief in my comments.

Biologically there is much evidence that the population would not be effected on a passage (birds that have already left the nest and are hunting independently from their parents) bird take at all. I would have no reason to object to a NRT for passage birds no matter what the number was. Papers have been written and plenty of documentation supporting there is no impact on the wild population of raptors from the falconry community. With mortality rates on first year birds in the 80%+ this would be a worth while endeavor to actually decrease this mortality rate by the falconry community. However the trampling of the gyr falcon nest sites in western Alaska is or great concern to me and should also be to the biologists here in Alaska.

The falconers of the world have a grand prize that all of them wish to obtain at some point in their falconry career. This is the white gyr falcon. There are few places in the world that support a wild breeding population of these birds. In the USA Alaska is the only place that has this resource. In the past falconers from the lower 48 have come to Alaska to harvested white gyr falcon chicks from nest sites, specifically out of western Alaska under legal and illegal means. Yes we already have had poaching and smuggling of Alaska gyr falcons. There is a huge interest in non-residents to obtain gyr falcons this is undisputable. It is my understanding was last year (5) permits were allowed for passage birds to be trapped by non-resident falconers and 23 falconers from outside applied for these permits. Of these 23 applicants I understand 1/3 of the applicants were non-resident propagators wishing to increase their genetics strains. I know of at least one large raptor breeders from outside who was in Kotzebue last breeding season performing a gyr falcon recon mission.

This resource needs to be protected as it is the only place in the USA that has a wild breeding stock of gyr falcons. A miscalculation or a trail period for allowing non-resident falconers to enter the gyr falcon nest sites could cause devastating results to this fragile

resource. Several points I would like to make in consideration of not allowing this proposal to be accepted are as follows:

1. The opening up of non-resident take for Alaska *passage* raptors was from my understanding a temporary situation that would be reviewed in the future for possible changes after there was data to be reviewed. The only review we have from this last year. This is hardly enough data to draw from to make any changes to the NRT.
2. The non-resident falconer has the ability through the current regulations to obtain a gyr falcon through trapping a passage bird. I have a picture of one of these birds that was trapped last year and it was a nice white bird. So the non-resident falconer who desired to white gyr falcon can obtain one through the existing regulations without the danger of them disrupting the fragile nest sites.
3. Fragile and desired resources have always been protected by the Department. Bison and Musk Ox hunts for example have always been coveted by the hunting community. As we see in the regulations there are no non-resident Musk-ox hunts available in the Nome area. Bison hunts for non-residents are a “once in a lifetime” permit. Very restrictive guidelines have been put into place for these coveted hunts and resident hunters have always have had a higher percentage chance to obtain these permits compared to the non-resident. I would suggest this same philosophy be instituted for raptor take in Alaska. No nesting bird take be allowed for Non-residents.
4. As an x-Alaska State Trooper I understand the difficulties of attempting to patrol bush Alaska. The areas that the nest sites are located in the Seward and Lisbourne Peninsulas and have no observable law enforcement. With the limited resources the State has with a budget crunch that we have not seen in decades there will be further demands on law enforcement to spend their patrol dollars wisely. Having a brown shirt Trooper fly the nest sites on patrol out of Nome and Kotzebue is not going to happen. Open this resource for NRT and you will have a free for all with no oversight.

Again to summarize I would ask that all nest site NRT not be allowed to protect this fragile resource that cannot recover from the kind of issues that could occur if non-residents were allowed to access the nest sites. I would have no problem with an unrestricted take of passage birds for NRT.

Thank you for your consideration on this extremely important issue.

Steve Bergh  
18727 Old Glenn Hwy  
Chugiak, AK 99567

Submitted By  
Timothy Sell  
Submitted On  
2/29/2016 11:01:53 AM  
Affiliation

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Anchorage, Alaska 99516

Comment on proposal #92. I am against this proposal. As a longtime Alaskan falconer I disagree that Non-residents should have the same rights, privileges and quota takes that residents now enjoy. The proposal is much too generous. Thanks you, Tim Sell

Submitted By  
Timothy Sell  
Submitted On  
2/29/2016 11:10:01 AM  
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Concerning proposal #93 on Non-resident raptor take. I have been a licensed falconer in Alaska since 1984. I favor this proposal. I understand that some of the local falconers are adamantly opposed to it because of the effect that it may have on their personal falconry experience, but I believe that the state should have an eyass raptor non-resident take. I would limit the take to 5 eyasses and 5 passage raptors. I think areas that are of concern to falconers or local biologist should be closed to non-resident take but remain open to resident falconers. Thanks BOG members for your work on our behalf! Tim Sell

Submitted By  
Bill Murrin  
Submitted On  
2/23/2016 4:47:25 AM  
Affiliation  
American Falconry Conservancy

Regarding: Proposal to increase the allowable harvest of falconry raptors for non-resident falconers:

The harvest of wildlife should be based on biology and not special interests. Alaska has a handful of falconers who have a special interest in barring, or at least limiting, access to Alaska raptors since they profit by the sale of domestic bred raptors - in particular, gyrfalcons (gyrs). Gyrs do not breed in the lower 48 and they are a highly prized raptor, therefore big money is at stake for these few raptor breeders and they've been ruthless in their attempts to bar non-residents from access to wild gyrs. I know this is true because I started the effort to open non-resident take 10 years ago with a now deceased falconer, Chad Cyrus. We were both verbally abused by these few falconers in the falconry community, so we decided to work on non-resident take under the radar and simply guide others. Our efforts proved successful, but these few Alaska falconers were successful in placing severe restrictions on harvest numbers to protect their interests to the degree they could. They managed to place greater restrictions on harvest than the Board of Game provided for. I feel that the Board should inquire as to why this was done. Fish & Game should not be influenced by special interests like this, especially since the resource is more than plentiful.

I would ask that the take of raptors be expanded to the level that the resource allows and that raptors be treated like all other wildlife resources, and not be treated specially as they now are due to these special interest money-making pressures. I am not against individuals like these Alaskans making money off of wildlife, but I am against them prohibiting access to wildlife to protect their pocketbooks.

Expanding harvest to sustainable levels would increase Fish & Game revenue which could be used to invest in raptor research to better understand just how extensive raptor numbers are. This would allow for further expansion of harvest which would increase revenue even more. It's a win-win for Alaska, but the special interests will do all they can to prevent this from happening. This demonstrates that they do not have the interests of raptors at heart, as they claim, but rather, their interests are selfish. Please do not allow these few individuals to influence Fish & Game's management of raptors. In this way, raptors will win and Alaska will win.



## CHUGACH STATE PARK CITIZENS' ADVISORY BOARD

HC 52 Box 8999, Indian, Alaska 99540 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 8, 2016

Re: February 2016 Board of Game Proposals

I am writing on behalf of the Chugach State Park Citizens Advisory Board regarding regulatory proposals that will affect Chugach State Park. Please consider these comments during the upcoming Alaska Board of Game meeting.

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:

1. To protect and supply a satisfactory water supply for the use of the people;
2. To provide recreational opportunities for the people by providing areas for specified uses and constructing the necessary facilities in those areas;
3. To protect areas of unique and exceptional scenic value;
4. To provide areas for the public display of local wildlife; and
5. 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 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 February 2016 Board of Game regulatory proposals that will affect the park's wildlife and users. Our recommendations passed unanimously during our February 8, 2016, meeting.

**Proposal 117 – Support.** This proposal would reauthorize antlerless moose seasons in Unit 14C, some of which are in Chugach State Park. We support antlerless moose seasons in the park to maintain moose populations near the low end (1,500 moose) of the subunit's population objective to avoid overbrowsing of winter range and subsequent die-offs.

Thank you for the opportunity to respond to the regulatory proposals submitted for the February 2016 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: Dave Battle, ADFG

Submitted By	Brian Simpson	Board of Game Comments
Submitted On	P.O. Box 61210	ADF&G
Affiliation	Fairbanks, AK 99706	Boards Support Section
Phone	907-322-9841	P.O. Box 115526
Email	Email: <a href="mailto:noainc@mosquitonet.com">noainc@mosquitonet.com</a>	Juneau, AK 99811-5526
Address		<a href="http://www.boardofgame.adfg.alaska.gov">www.boardofgame.adfg.alaska.gov</a>
		03/04/16

**Proposal #135: SUPPORT**

I support increasing the DB690 non-resident brown bear permits in Remainder of Unit 22 (which consists of the subunits of 22D and 22E) up to **21**, from the current cap of up to [12].

Upon careful consideration given to this proposal I request the BOG **Amend** the proposal and consider increasing the permits up to **24** [12].

**Overview:** DB690 permits are applied for and issued through the statewide draw permit system, and in order for a non-resident to have a valid permit while actually hunting must plan the hunt from at least 10 months (or longer) in advance for a fall hunt to 18 months or longer for a spring hunt. The non-resident hunter must purchase an \$85 hunting license and \$500 bear tag for the hunt. The resident hunter only needs a valid hunting license with no tag required, and can plan a hunt on a moment's notice.

Once issued a permit is non transferrable, which results in a lower actual harvest of bear than the number of permits available. Going through the lengthy process to have a valid permit during a hunt increases hunter opportunity and revenue to the state, it does not correlate to a one bear harvested for each bear permit increase in harvest.

During the past 16 years the average DB690 permit harvest has been 5 bears for each 12 permits issued, or 42% of the permits result in a harvested bear.

Assuming the BOG increased the permits available to 21 the projected average harvest would increase to 9 bears, and if 24 permits were issued the harvest would increase to 10 bears.

**Support:** Local residents in the communities within Remainder of Unit 22 are very supportive for harvesting bear. The only concern I have ever heard in the past 25 years is why as a guide, we are not harvesting more.

**Conservation:** The subset of non-resident hunter bear harvest in Remainder of Unit 22 percentage of boars harvested is higher than the subunit total, which when including resident hunts is 78%. The ADF&G management goal is a 50% floor.

My personal ancillary observations, from a 25 year period in the subunit in question, is an overall increase in bear population with the high boar harvest percentage also increasing.

The majority of harvests occur in the spring. Removing large boars during the spring calving season when the moose and caribou are at their most vulnerable is a very valuable management tool. Removing large boars in the spring also helps in bear cub survival, which helps stabilize the overall bear population in the subunit.

**Rural Economy:** The local economy is extremely depressed, and providing guided services to non-residents has become a dependable and essential source of income to local residents. This includes wages, equipment leases, lodging, groceries, gas, and a market for local handicrafts, fur items and artwork, which helps distribute the economic benefits throughout several communities.

**Summary:** Proposal 135 is a sound proposal for resource management, resource conservation and is beneficial to the local residents of the area in question. I urge the BOG to increase these permits.

Sincerely,

Brian Simpson



Submitted By  
Christopher O. Lake  
Submitted On  
1/22/2016 9:23:26 AM  
Affiliation  
Alaska Resident

**Subject: Opposition to Proposal 136 – Establish winter draw and registration hunts in unit 16B**

Dear Chairman Spraker and members of the board:

My name is Chris Lake and I am writing to you in regards to proposal 136 for GMU16B. My family and I have hunted and fished in this area for over thirty years. I am very concerned about some of the changes to be made that will shorten the traditional fall moose hunt by five days which would have the season ending on the 20th instead of on the 25th as it is now. I am asking the board to leave the fall moose hunt end date on September 25th.

I am also concerned about the proposed additional winter hunts. Just 10 or so years ago the area went from a Harvest License to Tier II because there were so few bulls. Now there are too many? In researching I found the last time moose were counted in 16B was in 2010/11. We had a winter with record snow since then, not to mention predation, and I would encourage the board to hold off on additional hunts until updated population studies have been done.

Respectfully,

Christopher Lake

Alaska Resident hunter



Michael W. Williams  
7362 W. Parks Hwy #501  
Wasilla, AK 99623

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



**SUBJECT: OPPOSITION TO PROPOSAL 136 – ESTABLISH WINTER DRAW AND REGISTRATION HUNTS IN UNIT – 16B**

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I have lived full time for the past 22 years in east unit 16B (Alexander Creek drainage). I also served 6 years on the Yenlo Advisory Committee. I am writing today because of my concerns over the changes to the moose hunting regulations that the ADF&G is proposing for unit 16B.

I cannot speak for all of unit 16B, but to increase hunting pressure in eastern 16B could be devastating. Most winter moose hunters ride snowmachines and look for moose along the Alexander Creek drainage. Rightfully so, it is easy to access and generally well populated with moose in the winter. The problem is a Dec-Mar hunt means bulls have dropped their antlers and as a result must be looked at very closely to determine sex. That results in every moose in the drainage being constantly harassed throughout the entire season. It is my fear that pregnant cows will be harassed to the point that there will be significant cow/calf mortality. These moose winter in the drainage...especially in heavy snow years because of more browse and less snow depth. They do not leave the drainage all winter which means constant inadvertent harassment by hunters. Also, for those without experience the accidental killing of cows is likely.

Having lived here for over 22 years I know that the Alaska Fish & Wildlife Troopers are not manned to police an onslaught of hunters. We are lucky if we see a trooper every couple of years.

Before the crash in the moose population 16B had a fall season running from Aug 20-Sep 30 for any bull 36" plus and no brow tine restrictions. These regulations worked well for years. Why are we not returning to the previously functioning regulations rather than something new that could cause serious damage to the moose population?

For several years when the moose were being intensively managed by ADF&G an annual moose count was conducted in November around Thanksgiving. Our farm (EagleSong) located on Trail Lake was used as a refueling and rally point. There has not been a survey of that magnitude done in several years. It appears to me that moose numbers are on the increase, but when was the last survey completed? Shouldn't we know for sure what we have before we arbitrarily increase harvest numbers?



I believe this proposal is poorly thought through and coupled with a couple of "average winters" will be devastating to the resident moose population...at least in eastern 16B. The moose population in 16B was successfully managed for years without such a proposal as this. I see no good reason to justify implementing such a regulation now.

Respectfully,

Michael W. Williams

Submitted By  
walter d nesbett  
Submitted On  
1/29/2016 2:46:48 PM  
Affiliation

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SUBJECT: OPPOSITION TO PROPOSAL 136 – ESTABLISH WINTER DRAW AND REGISTRATION HUNTS IN UNIT – 16B

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Chairman Spraker and Members of the Alaska Board of Game,

My name is Walt Nesbett and I'm a 63 year-old lifelong Alaskan. I have harvested fish and game in unit 16B, mainly from our family's remote fly-out cabin, since I was old enough to climb into the back seat of my dad's Super Cub. I am writing today because of my concerns over the changes to the moose hunting regulations that the ADF&G is proposing for unit 16B.

My first concern is the possible loss of hunting dates to the traditional fall hunting season. The ADF&G's proposal 136-5AAC 85.045(14) that I read stated the fall season would end on September 20th. This would mean a five day loss to the fall season, because for the last 3 years, we have been allowed to hunt until the 25th. Upon reading this in the proposal, it seemed to me that the proposal was disenfranchising the traditional fall hunter to the advantage of the winter snow machine hunter. The proposal creates a brand new winter hunt while at the same time reducing the length of the fall season. I called the ADF&G's area biologist for 16B and expressed my concern about the reduction in fall hunting dates. He was sure that the season ended on the 20th of September. Only after checking did he admit the season ran until the 25th. He then assured me there would be no change to the fall hunting dates. I will watch to see if the date change gets made to the proposal.

I am also concerned that the numbers, as related to the overall moose count and the bull-to-cow ratios, are from surveys that appear to be four to five years old. These numbers are important because they form ADF&G's argument for significantly liberalizing the harvest. The latest survey report I found online showed the middle section of 16B had not been surveyed since 2011 and the south section since 2010. How can the ADF&G justify making such a radical change to the moose hunting regulations (liberalized winter hunts, possible antlerless harvest) on such dated information? The winter of 2013 saw record snowfall in 16B, and factoring in predator kills, who knows what the actual moose count is in the unit. In addition, the past two seasons have seen hundreds of any bull tags issued to intentionally reduce the bull to-cow-ratio. However, there has been little to no effort to measure whether there are fewer bulls now. I would additionally like to point out that nowhere in the proposal did the ADF&G state their position relied on such dated survey information. The state can and should do better than this.

The ADF&G is also not clear in its proposal how it plans to set up and monitor the harvest in the winter open registration hunts. Unless these permits are issued for very specific sub-units within 16B and monitored closely, I fear the majority of the bulls will be killed as close to the major river arteries as snow machine hunters can find them. This, of course, defeats the whole purpose of the ADF&G's proposal, and could ultimately lead to more restrictive hunting regulations for everyone down the road.

In closing, I would ask the Board of Game to instruct the ADF&G to slow down on implementing this proposal. Get a current survey of unit 16B, including moose counts and bull-to-cow ratios. Find out if the any bull tags have worked. Formulate an in-depth plan on managing and monitoring any winter registration hunt in order to avoid a possible severe reduction in hunting seasons.

Respectfully,

Walt Nesbett

January 4<sup>th</sup>, 2016

State of Alaska  
Department of Fish & Game

I would like to address Proposal 138 – 5 AAC 85.055 Hunting Seasons and bag limits for Dall Sheep.

This proposal recommends a change for non-resident sheep hunters on state and BLM lands to drawing permit hunts. This proposal is of tremendous concern to me as a family of Guides who have been guiding in the Wrangell Mountains since 1962, I'm not clear if this would affect my families guide area since I am in the Wrangell St. Elias Preserve and am not on State or BLM land but as a guide I feel this proposal is inequitable for other guides in the State of Alaska. I realize as we all recognize that the sheep population has been decreasing and over crowding has become an issue.

It seems that this proposal was based on a quote from the Board of Game Chairman who expressed two major concerns – that of conservation of the resource and crowding. As stated in this proposal “currently non-resident guided sheep hunter’s take 40% of the total statewide sheep harvest” what this leaves out is that in 2014 there were a total of 1062 registered Big Game Guides in the state, covering all units. Of that number approximately 2800 sheep were taken by non-residents.. Basically that equates to 2.6 sheep per guide, These number do not reflect how many of these non-resident hunters were not accompanied by guides but instead by family members. I realize some guides do not hunt sheep but the broad statement made in this proposal alludes to this number only being taken buy guided non-resident hunters. When you look at the figures I don’t believe the “guides” are the major problem in regards to the decline in sheep populations or over crowding.

I have given this some thought and have observed 5 different air taxi services just in the area we guide in. Since we are in the Preserve and have a Federal Concessionaire’s Permit we don’t guide anywhere but in our unit. We have no other guides who hunt in this unit other than those with a concessionaire’s permit. These numbers are less than 10 guides, however we are also experiencing over crowing. This is strictly do to the air taxi services bringing in residents and there non-resident relatives to hunt, the air taxie services do not seem to have any regards to how many residents/relatives they drop off in a specific area nor do they have any restrictions on whether or not other hunters have already been dropped in the same location by another service. This huge influx of hunters continues to have an impact on the sheep population.

Something else I must point out is that even though a hunter may well be a resident of the state that does not guarantee their success or ensure they have the necessary hunting skills to take a Dall sheep. Many hunters may only be a resident for a few years and tackle a sheep hunt. It requires specific skills that not all resident hunters possess. Thus the lower success rate of resident vs non-resident guided hunts. Registered guides who are in the business of guiding for Dall Sheep have many years of experience and thus a tremendous amount of skill when it comes to stalking Dall sheep. Frankly, a lot of resident hunters just do not have that skill as many do not stalk/hunt sheep on a yearly basis.

In addition, the quote in this proposal is very misleading. It states “Because guides are well equipped, they have large camps, wall tents, a string of horses, aircraft, they’re set up, I mean this is their business,” Yes, it is a business for guides. However, not all guides have aircraft, In the game unit where I hunt there are approximately 8 guides, of those only 3 have aircraft. However, the air taxis services drop off sheep hunter after sheep hunter and have no regard for those who rely on guiding for their livelihood.

So with this said, I do believe that overcrowding is a concern, all residents have a right to hunt where they choose, however this often puts them in areas where other resident hunters are also hunting. Sheep populations are declining. When the bear population declined changes were made to prevent over harvesting of the grizzly bear. A limit of one grizzly every 3 or 4 regulatory year for most units turned that decline around. I propose we do the same for sheep.

If non-resident sheep hunters were required to go to a draw permit hunt there would be no possible way for a guide to plan ahead for the upcoming hunting season. This would absolutely reduce state revenue from non-resident hunters, however, if the State were to change the regulations to one sheep every 3 or 4 regulatory year this would reduce pressure on the sheep and decrease crowding.

Sincerely,

Sheila Vaden  
Solo Creek Guide Services, LLC

Submitted By  
Virginia De Vries  
Submitted On  
3/4/2016 6:30:55 AM  
Affiliation

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Willits, California 95490

Dear Board of Game:

I support proposal 141 with the addition of the four modifications as detailed in the comments submitted by the Alaska Wildlife Alliance and the Denali Citizens Council. Since you know what these modifications are, I see no need to belabor them. I would like to refer to the National Geographic issue of February 2016 on Denali and more specifically to the information of trapper Coke Wallace of which I'm sure you are familiar. To quote the article on page 69, "In 1999 Wallace shot a collared alpha female in the Grant Creek pack which had been highly visible to visitors on the Park Road. In 2012 he dragged a horse carcass to a site where wolves were active and set traps and snares around it. When he returned a few days later, he'd trapped a pregnant female belonging to the East Fork pack. The kill documented by a neighbor and later confirmed by Wallace, landed him in the Los Angeles Times and generated both death threats and a boost for his guiding business. That same year Wallace caught the only remaining breeding female in the Grant Creek pack, which often roamed just outside the park boundary. The pack consequently produced no pups and fell from 15 members to 3."

"That was the third time I ruined millions of people's Denali National Park viewing experience, Wallace quips."

The Board of Game should be concerned about these millions of people who come to Alaska to see rare wild game such as wolves. Tourism is extremely important to Alaska and so should its wildlife be, especially with the decline of oil revenue. As someone who comes to Alaska regularly, I urge you to protect this dwindling resource by passing proposal 141 with the four above mentioned modifications.

Submitted By  
Austin Kinser  
Submitted On  
3/4/2016 9:47:47 AM  
Affiliation

To Whom It May Concern,

I am writing to show my support for the reduced wolf hunting season in the Wolf Townships/Stampede corridor for the 2016 hunting season and beyond. As an employee working deep in the park over the last 6 summers, I can tell you that the hunting wolves in this area makes an enormous impact on the number of wolves seen by visitors to the park. I personally went from seeing wolves on a weekly basis to seeing one or two a summer following the killing of two females(one pregnant) a few years ago. While I feel that people should be able to hunt and trap, I also feel that one or two people harvesting wolves in this area at such a critical time is doing a huge disservice to the hundreds of thousands of visitors to Denali NP&P. For the benefit of the wolves, the park and everyone (excluding the **one** person who harvests the wolf) who visits Denali, it is critical to close this area to wolf hunting or at the very least, shorten the season so that they have a chance to reproduce and maintain a healthy population.



Submitted By  
Becky Irish  
Submitted On  
3/2/2016 7:00:02 AM  
Affiliation

Phone  
907-750-5475  
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Address  
PO Box 175  
Denali, Alaska 99755

I respectfully ask that you approve Proposal 141 to shorten the wolf hunting season on state lands north of Denali National Park. Currently, the wolf hunting season runs from August 10-May 31st. Proposal 141 shortens it to run from Aug 10 - April 15th. I am in full support of shortening the hunting season.

I am Becky Irish and I have lived in McKinley Village for 18 years; I own my home in what I believe is the most beautiful place on the planet. I am a military veteran having retired from Clear AFS after serving 20 years in the Air Force. I am also a wilderness tour guide in Denali National Park and Preserve and have driven the Denali Park Road for the past 16 years. I interact with literally thousands of tourists throughout the summer who ride my tour bus into the park. Their primary reason for visiting DENALI is to see wildlife in their natural environment. Their primary reason for visiting ALASKA - is to see wildlife in their natural environment. Visitors feel disappointed on days with low wildlife sightings; they feel cheated when I tell them wolf numbers are at such low levels that they probably will never see one. Last summer, I drove 120 miles per day into the park, 4-5 days per week, and my tour bus saw TWO WOLVES the entire summer. My visitors walked away with a feeling of a wasted trip to Alaska, they felt as though the tourist brochures portraying bears and wolves gave them false hope of experiencing a wild place. For many of my visitors - the Denali Park Road is the "wildest" place they may ever experience in their lives. If you were to talk to the old timers around here who have driven buses into the park for 30 or 40 years, they will tell you wildlife sightings now a days are fewer and farer between. The Denali Park Road really is one of the last places left on the planet where a visitor can ride on a bus for a day and have the opportunity to view grizzly bears, wolves, moose, caribou and sheep. That's what draws the visitors here - to view wildlife. And I think we can all agree that Alaska benefits financially from summer tourists.

This is the time to protect Denali wolves when more hunters are on state lands north of the park for bear baiting (season starts April 15th). I believe it is also important to protect wolves during a time when more pregnant females are afield. The risk to the wolves is not theoretical. Two wolves from the East Fork Pack were killed near a bait station last spring, one of them a pregnant female. These deaths resulted in an emergency hunting closure by the Alaska Department of Fish and Game.

I want to remind the Board of Game, that although Proposal 141 is helpful, a comprehensive, no-hunting /trapping closure of lands in the Stampede and Nenana Canyon areas is the only solution for long-term protection of Denali wolves.

I believe that there are members of the Board of Game who would support this.

Submitted By  
Ben Seymore  
Submitted On  
3/4/2016 10:07:41 PM  
Affiliation

Dear Honorable BOG Members

As a former Alaska resident I look forward to the day when i can return to Denali NP and View the the Grey Wolf in its natural state, (making its daily living unmolested in Denali NP) protected, As was intended by the founders of Denali in 1917. And to get my Trophy shot. Not with a firearm, but with a camera. I might even choose to hire a guide to go into the stampede wolf townships to get that picture of a lifetime of a Denali wolf crossing the park boundry to feed his/her family. Please help make this a real possibility for me and thosands of other people that shoot with camera's and not bullets. I urge you all to vote YES for NPS PROPOSAL 141 And to see the prudent and wise resource decision to close the hunting and trapping at the earlier date of April 1. And to go into effect 2016. There is simply no more time to waste, to save the dwindling number of Wolves in the eastern portion of Denali NP. A DENALI NP WOLF IS WORTH A LOT MORE \$ TO THE ALASKA ECONOMY ALIVE & HEALTHY THAN IT IS DEAD WITH ITS HIDE SALTED ON A SKIN STRETCHER.  
SINCERELY/ I AM LOOKING FORWARD TO PLANNING MY PHOTOGRAPHIC TROPHY HUNT.

Submitted By  
Beth Sturgeon  
Submitted On  
3/2/2016 3:27:54 PM  
Affiliation

Phone  
4019329543

Email  
[sturgeon.beth@gmail.com](mailto:sturgeon.beth@gmail.com)

Address  
60 Buena Vista Drive  
North Kingstown, Rhode Island 02852

Having worked as a bus driver in the park for almost 2 decades, I can tell you that seeing a wolf is always a special moment, one that I never get tired of having. Unfortunately, these moments are happening less and less, please do everything you can to protect what's left of the Denali wolves.

Submitted By  
bob tourtelot  
Submitted On  
3/2/2016 8:04:34 AM  
Affiliation

I have worked as a driver in Denali National Park since 1982. I have had contact with many,many visitors to the park from Alaska and all over the world. Those visitors are drawn to Denali because it is an intact environment that provides possibilities for experiencing wilderness that is difficult to find else where. Wolves are an integral part of this experience and their protection in areas surrounding the park from hunting and trapping , particularly during denning, is essential. Please use Proposal 141 to create a shorter period of vulnerability for the Park wolves.

Submitted By  
Catherine Smith  
Submitted On  
3/3/2016 7:41:34 AM  
Affiliation

Dear Madam or Sir,

Please shorten the hunting season on wolves as stated in proposeal #141. Wolf sightings in Denali have significantly decreased following the death of an alpha member of a Denali wolf pack. Wolf packs have social structures and choas ensues when specific members of their pack are killed. Please take tourism into consideration when making these decisions. We now go to Yellowstone if we want gauaanteed wolf sightings--a loss to Alaska. As ou well know, wolves are apex predators. They improve the health of ungulates and habitat. Please consider adding a buffer zone around the park for these far ranging animals who are so important for healthy ecosystems.

Thank you,

Cathy and Mike Smith

**From:** [Cheryl & Mark Lovegreen](#)  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Subject:** Proposal 141  
**Date:** Wednesday, March 02, 2016 3:09:08 PM

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I write to encourage the board to approve Proposal 141 to shorten the season for wolves. This proposal would increase the survival rate for pregnant females, leading to more opportunities for scientific study of wolves and for the positive growth of the tourism industry to take place. These actions would help residents throughout the state.

Thank you for your time,

Cheryl Lovegreen

Submitted By  
Christine Byl  
Submitted On  
3/2/2016 7:46:52 PM  
Affiliation

Thanks for your consideration. I am writing in support of Proposal 141 by the NPS, to shorten the trapping season for wolves, with an end date of April 15.

I live in the Wolf townships, off Stampede Road. Based on the low numbers of Denali's historic Wolf packs and the human-caused deaths last spring, I requested an emergency closure of the Wolf Townships to wolfhunting/trapping for the spring season and was thrilled when such closure was made. I support the full reinstatement of the wolf buffer as a permanent solution, but in lieu of that right now, permanently shortening the season to end on April 15 will go a good way to protecting vulnerable alpha females in breeding season. Protection of this wolf pack is not about an anti-trapping vendetta. Denali's wolves are an incredible resource, a tourism bedrock that helps draw economic benefit to the Borough, and this wolf pack has special scientific significance in that it has been studied for over 50 years and is a symbol of stellar wildlife research. Please protect this distinctly Alaskan resource and honor Alaskans' right to be heard.

Thank you.

Submitted By  
Christine Richards  
Submitted On  
3/2/2016 10:54:57 AM  
Affiliation

To the Board:

PLEASE consider not only approving this change, but adapting it to end both hunting and trapping season earlier, on April 1st or March 15th. I have lived and worked in Denali since 2006, and in that time a wolf sighting from the park road or while hiking in the backcountry has become a rare event. I used to see several per season (I only go into the park on days off from work), but last year I don't think I saw any... the year before, only one or two. It's heartbreaking to me every time I hear of a wolf killed, especially when they have been lured outside of park boundaries specifically for that purpose. Denali stands out from our other national parks in that it was created with wildlife preservation as one of its primary goals. This does not only apply to Dall sheep, but to caribou, moose, bear, lynx, and others... including Wolves! I implore you to consider carefully the harm that is being done to this ecosystem, the impact it has on the visitor experience, and the good you could do by shortening the season. You are not taking anyone's rights away by doing this; is there any other animal that can be hunted 10 months out of the year?! (Perhaps there is... I was ignorant of this fact until now, and I am shocked by it.) Please do your duty in upholding the ideals and mission Denali National Park was built on. Please allow both visitors and locals alike the joy and wonder of looking into the eyes of a wolf through the bus window. Please help our wolves; the deck has been stacked against them for far too long. It's time to try to salvage the population after the damage that has been done, and this is a way to begin to attempt that.



Submitted By  
Don Soileau  
Submitted On  
3/2/2016 5:53:24 AM  
Affiliation  
DNP&P Concession Employee

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(907) 440-2296  
Email  
[donsoileau@hotmail.com](mailto:donsoileau@hotmail.com)  
Address  
645 G Street #530  
Anchorage, Alaska 99501

Please adjust the hunting/trapping season to end on March 15th. Better yet, please reinstate the buffer zone that once existed north and east of the park boundary. Thanks!

Submitted By  
Elizabeth DeNiro  
Submitted On  
3/3/2016 6:53:42 AM  
Affiliation

Phone  
509-238-6562  
Email  
[Elizabe754@aol.com](mailto:Elizabe754@aol.com)

Address  
16226 N. Sands Rd.  
Mead, Washington 99021

I support limiting the hunting season on wolves as much as possible. I understand there is a proposal #141 to do that. It is on land adjacent to Denali National Park. Last summer I took a bus ride through Denali which was affiliated with an Alaskan cruise. We never saw a wolf and the bus driver said they almost never did see wolves. To me, wolves are a part of Alaska and belong there. Thank you.

Submitted By  
Gabriel Travis  
Submitted On  
3/3/2016 8:30:52 AM  
Affiliation

Thanks for your consideration. I am writing in support of Proposal 141 by the NPS, to shorten the trapping season for wolves, with an end date of [April 15](#).

I live in the Wolf townships, off Stampede Road. Based on the low numbers of Denali's historic Wolf packs and the human-caused deaths last spring, I requested an emergency closure of the Wolf Townships to wolfhunting/trapping for the spring season and was thrilled when such closure was made. I support the full reinstatement of the wolf buffer as a permanent solution, but in lieu of that right now, permanently shortening the season to [end on April 15](#) will go a good way to protecting vulnerable alpha females in breeding season. Protection of this wolf pack is not about an anti-trapping vendetta. Denali's wolves are an incredible resource, a tourism bedrock that helps draw economic benefit to the Borough, and this wolf pack has special scientific significance in that it has been studied for over 50 years and is a symbol of stellar wildlife research. Please protect this distinctly Alaskan resource and honor Alaskans' right to be heard.

Thank you.

**From:** [Gary Borenstein](#)  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Subject:** Proposal 141  
**Date:** Thursday, March 03, 2016 1:15:24 PM

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I am in support of the adaptation of proposal 141 at the upcoming Board meeting in Fairbanks.

I have lived and worked in and around the Park for over thirty years. I have been a bus driver on the Park road for the last 21 years ( driving over 1000 hours each summer ), and have lived 8 miles south of the Park entrance for the last 18 winters. There has been a distinct lessening of wolf viewing opportunities recently, coincidental with the abolition of the Wolf Townships protected status.

The adaptation of proposal 141 would be a small step in rectifying a situation that has left hundreds of thousands of Park visitors disappointed in the chance of seeing a wolf in its natural environment. Thank you for your consideration of this matter.

Sincerely,  
Gary Borenstein

Submitted By  
George Hamilton  
Submitted On  
3/2/2016 8:25:59 AM  
Affiliation  
Denali NP Tour Driver

As a Wilderness and Kantishna Tour driver in the park wolf sightings, in a very short timeframe, have plummeted. Guests to Alaska, spending hard-earned savings for a once-in-a-lifetime, vacation ask if they will see wolves? Along with Grizzlies and Denali Mountain, wolves are a top viewing priority for guests to Alaska and the Park. Tourism is and can be an ever-growing economic positive for the state, country and world. When guests, to Denali, ask where the wolves are, they are told, diplomatically, but they are told the truth. Which basically boils down to their experience is not a priority, to The State of Alaska, when wolf viewing is considered. They are told about the buffer zone and the "politics" involved in its no longer existing. Also, that it is literally outrageous that one non-caring, uneducated individual is largely to blame for the problem. National Geographic was very honest on this issue and those involved in their recent article "How can six million acres not be enough?" Anything that can be done to show Alaska as a smarter, involved, caring manager of its resources, nature and wildlife will only lead to a more prosperous future, from ant perspective.

Submitted By  
Heike Killet  
Submitted On  
3/2/2016 9:18:17 PM  
Affiliation

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+32496863210

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[heikekillet@gmail.com](mailto:heikekillet@gmail.com)

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34 Rue de la Poterie  
Belgium  
Boussu-lez-Walcourt, Other 6440

**Proposal 141 - Support with the addition of the four modifications as detailed in the comments submitted by the Alaska Wildlife Alliance and the Denali Citizens Council.**

The Denali wolves that den in the northeastern area of the park and cross the boundary onto state land are unique: they are the most easily viewed wolves in Alaska. They are an important financial, cultural and scientific resource and as such deserve special management considerations. More than 500,000 visitors come to Denali each year, spending more than \$5 million in the local economy. High on their must-see lists is wildlife, especially wolves. Currently the park wolf population remains at a near-record low: visitors' chances of seeing a wolf are a near-impossible 4 percent. A significant cause for the decline is hunting and trapping adjacent to the park. Proposal 141 would remove hunting and trapping pressure when the wolves are most vulnerable, during breeding season.

Proposal 141 should be approved with the following modifications: immediate implementation in the 2015-16 regulatory year; expansion to include the entire Stampede Corridor area; closure of the hunting season earlier, on Mar 15 or April 1st; and closure of both the hunting and trapping seasons on April 15.

Thank you very much,

Heike Killet

Submitted By  
Hugh Rose  
Submitted On  
3/3/2016 5:08:27 PM  
Affiliation  
None

Phone  
907-388-2554  
Email  
[hrose@alaska.net](mailto:hrose@alaska.net)  
Address  
620 Yak Rd  
Fairbanks, Alaska 99709

To the Alaska Board of Game:

My name is Hugh Rose and I am a 23 year resident of Alaska who has spent all 23 years working in tourism and photography in Alaska. I lived on the Stampede road for a number of years in the mid-1990's on Regulus Road where I owned a small house while I worked in Denali National Park. I have a scientific background (in geology) and I am versed in science and scientific methods.

The Denali Park wolves are in dramatic decline as evidenced by a 50% reduction in their population over the last few years, in particular since the buffer zone preventing trapping and hunting of wolves on state lands in the Stampede corridor was removed by BOG. I spend significant time in Denali Park every year both as a photographer taking images of OUR amazing National Park that attracts almost a half million visitors every year and MILLIONS of dollars to the local and state economy and accompanying visitors to Kantishna where they expect to see wildlife including wolves in the CROWN JEWEL of American parks. One of the main species that visitors come to see are wolves, which Denali visitors used to see many of, but since the removal of the buffer zone sadly wolf sightings have almost completely ended (look at Park service statistics). Throughtout the first ten years of the 21st century I photographed wolves on every trip into the park, photos which are an important part of my portfolio and important for marketing Denali Park, to the visitors who come with the dream of seeing a wolf. Sadly I have not seen or photographed a wolf in the last 4 summers either while on photo permit or while going through the park to Kantishna. I have to tell tourists the sad story of how we used to see wolves along the park road corridor on almost every trip, but ever since the Alaska BOG decided to take an anti-wolf stance and remove the buffer zone from state lands their chances of seeing a wolf has become nil....

Proposal 141 is the first step in beginning to restore wolves to the Denali Park ecosystem, and the BOG should implement this proposal. I emphasize this is only a start! The BOG needs to reinstate the old buffer zone on state lands and extend it to include all of the Wolf Townships and state lands to the east of Denali Park. In the interest of protecting Denali Park wolves for research purposes and for visitors who contribute more to the local economy than any other source, the BOG needs to act now and shorten the hunting/trapping season on wolves in State lands according to Proposal 141. In addition it has been proven over and over again that top level predators such as wolves and bears are critical for ecosystem health and stability. If it is the goal of the Alaska BOG to maintain species such as caribou and moose for harvest, then wolves need to be part of the overall ecosystem and the only way to ensure this is to afford them protection on state lands adjacent to the park. The boundaries between national park and state are political, not based on wildlife population dynamics.

Proposal 141 is an opportunity for the BOG to act responsibly and show Alaskans and the rest of the country that Alaska actually cares about it's wildlife resources, and wildlife that lives in the National Park most of the year. Wildlife that is watched by tens of thousands of people, both Alaskan and outsiders who bring a significant amount of money to the local economy. For all these reasons I encourage BOG to support Proposal 141 as a first step to protecting Denali Wolves for future generations.

Sincerely

Hugh Rose

Submitted By  
Jeanne Fedel  
Submitted On  
3/3/2016 7:28:20 PM  
Affiliation

**Proposal 141 - Support with the addition of the four modifications as detailed in the comments submitted by the Alaska Wildlife Alliance and the Denali Citizens Council.**

PLEASE support proposal # 141, although do **not** consider this a substitute for a no-wolf-hunting-and-trapping buffer zone adjacent to the park. I realize that the Alaska Wildreness Alliance has astutely been advocating for such a buffer for years - as the wolf population and visitor viewing success have steadily declined. I fully support a no wolf hunting and trapping buffer, but proposal #141 is definitely a step in the right direction. As a teacher who has used the knowledge gleaned from biologists' discoveries of how the wolves help their ecosystems thrive, I applaud every effort made to help protect wold packs.

**Below are the four modifications (as detailed in the comments submitted by the Alaska Wildlife Alliance and the Denali Citizens Council):**

AWA and DCC strongly urge the BOG to expand the scope of Proposal #141 to include the following modifications:

- 1. Apply the shortened hunting season to the remainder of the 2016 hunting season.** If approved in March, by law the change would not take effect until the 2016-17 regulatory year, beginning July 1. This would leave the wolves still vulnerable to killing at bait stations this spring. As evidenced in 2015, the loss of even a single breeding female can exacerbate the population decline among park wolves. Given the liberal harvest limits it is possible that more than one breeder could be attracted to and killed near a bait station.
- 2. Include the entire Stampede Corridor (east to the Parks Highway) in the new regulation.** Wolves migrate through the Corridor in pursuit of prey as far as and across the highway. The entire Corridor is open to bear baiting, and the last easternmost section would be a relatively small addition.
- 3. Change the hunting season closure to an earlier date.** NPS data shows that wolves in the park breed as early as the first week of March. Closing the hunting season on March 15 or April 1 would protect the breeding wolves and therefore hasten a rebound in the population.
- 4. Shorten the wolf trapping season to coincide with the shorter hunting season as indicated in #3, to either March 15 or April 1.** Currently trapping does not end until April 30, and wolves also can be shot at trap lines. There is no harvest limit on trapping. If the trapping season remains unchanged, the wolves - especially the breeders - will remain vulnerable to loss, the very result that this proposal is intended to mitigate.

Thank you for your consideration into this matter,

Jeanne Fedel



Submitted By  
Jessica Toubman  
Submitted On  
3/3/2016 10:05:01 PM  
Affiliation

To the Alaska Board of Game members,

I currently live just outside of Denali National Park and have been working with visitors who come to the park for over 12 years. I am in support of Proposal 141 which would shorten the wolf hunting season in the Stampede area of 20C so it would not overlap with the bear baiting season which begins April 15. I would also support closing the season even earlier, April 1, so pregnant females would be less likely to interact with the increase in hunters who arrive with the warm temps of April.

I have interacted with people who come to Denali Park from all over Alaska and the world to view wild wolves. When I talk to tourists who were lucky enough to see a wolf, they often remember it as a highlight of their trip into the park or even Alaska. The wolf populations within the park right now are low compared to previous decades and losing members of the pack, particularly the pregnant females, may affect the future ability of visitors and locals to experience these animals in their natural habitat.

Thank you for your time and the ability to comment on this proposal.

Submitted By  
Jo  
Submitted On  
3/3/2016 11:16:53 AM  
Affiliation

Phone  
215.640.0300

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

Address  
100 E Glenolden Ave., E21  
Glenolden, Pennsylvania 19036

All species deserve to be protected. Disturbing nature's natural balance has proven to be detrimental to countless ecosystems. You must stop the killing of wolves when they cross from the park onto state land. It's inconceivable that the park wolf population remains at a record-low count of about 50 wolves. You can make the difference.

Submitted By  
Karen Walker  
Submitted On  
3/3/2016 3:31:00 PM  
Affiliation

Phone  
907-278-0628  
Email  
[travelingkaren@hotmail.com](mailto:travelingkaren@hotmail.com)  
Address  
1640 Eastridge Drive #301  
Anchorage, Alaska 99501

Alaska Board of Game:

I am a nature tour guide in Denali National Park and throughout Alaska. In my 30 years guiding visitors around Alaska, Denali has been the one location where visitors had a decent opportunity to see wild wolves. However, we have not had the opportunity to see a wolf in Denali for many years. This tremendously impacts the visitor experience of Alaska's wilderness. The visitors are also appalled to hear that these wolves are being drawn into bait stations just outside the park. The wolf hunting season absolutely should not overlap into the baiting season. The wolf population in Denali National Park has dropped so significantly that this issue needs to be addressed now. It cannot wait another year.

I am requesting your support of Proposal #141 with the following modifications: immediate implementation in the 2015-2016 regulatory year; expansion to include the entire Stampede Corridor area; closure of the hunting season earlier, on March 15; and closure of both the hunting and trapping seasons on April 15.

Please respect the wishes of tourists, wildlife viewers and nature lovers and support Proposal #141 with the modifications at the next board meeting. Thank you.

Karen Walker  
1640 Eastridge Drive #301  
Anchorage, AK 99501

**From:** [Lenora Morford](#)  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Subject:** Support Prop. 141  
**Date:** Friday, March 04, 2016 4:23:33 PM

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Dear Board of Game members:

I strongly support Prop 141 to protect wolves.

I have lived in Alaska for 34 years and I strongly support the Denali buffer and shortening the hunting and trapping seasons to protect wolves on the eastern and northern park boundary of Denali National Park.

I have driven the shuttle bus through the park for 4 seasons during the 1980s. Wolves were more numerous then and I have seen the thrill and importance to visitors of seeing a wolf in the wild.

The significance of visitors witnessing rare and extraordinary sightings and then telling their friends should not be underestimated. The tourist industry is important, and should be supported by all state officials.

You need to protect these wolves. They are important to thousands of people and contribute to the Alaskan economy. That is far more important than a few wolf pelts. You have to weigh the greater good.

Please vote to support Prop 141 and eventually restore the Denali buffer zones to the Stampede wolf townships, please!!!

Thank you,

Lenora Morford  
POBox 672263  
Chugiak, AK 99567



Submitted By  
Laura Rains  
Submitted On  
3/2/2016 9:57:30 PM  
Affiliation

Phone  
541-954-5811

Email  
[cliffordsayswoof@aol.com](mailto:cliffordsayswoof@aol.com)

Address  
PO box 50771  
Eugene, Oregon 97405

Stop wolf hunting now!

Submitted By  
Laura Sneddon  
Submitted On  
3/3/2016 1:24:42 PM  
Affiliation

Dear Board of Game,

I'm writing in regards to Proposal 141. I support this proposal with the addition of the four modifications as detailed in the comments submitted by the Alaska Wildlife Alliance and the Denali Citizens Council.

Given the low population number of wolves in Denali National Park, more needs to be done to protect the wolves that currently exist and to foster an environment where future packs can breed and live without danger of being shot or trapped. The wolves in the park are not only an ecological asset to nature, but a financial one for the state given the number of tourists and visitors who come to the area with the intent of seeing these animals. If they are not protected and their population decreases rather than increases, nature and wildlife enthusiasts will be saddened and the state will see negative financial repercussions.

For these reasons, please approve Proposal 141, but with the following modifications: immediate implementation in the 2015-16 regulatory year; expansion to include the entire Stampede Corridor area; closure of the hunting season earlier, on Mar 15 or April 1st; and closure of both the hunting and trapping seasons on April 15.

Lastly, it's important to point out that even if Proposal 141 is passed with all of the requested modifications, it is **NOT** a substitute for a no hunting/trapping buffer zone adjacent to the park. The implementation of a buffer would provide much more protection and should ultimately be considered and enacted since Proposal 141 will not provide as much protection as a buffer and it is supported only as a partial, interim solution to offer a measure of protection to breeding wolves.

thank you,

Laura Sneddon

Los Gatos, CA

Submitted By  
Lee Ann Stiff  
Submitted On  
3/3/2016 7:14:28 AM  
Affiliation  
  
Phone  
8054521254  
Email  
[lstiff66@aol.com](mailto:lstiff66@aol.com)  
Address  
306 W Summer Street  
Ojai, California 93023

**Proposal 141 - Support with the addition of the four modifications as detailed in the comments submitted by the Alaska Wildlife Alliance and the Denali Citizens Council.**

\* The Denali wolves that den in the northeastern area of the park and cross the boundary onto state land are unique: they are the most easily viewed wolves in Alaska. They are an important financial, cultural and scientific resource and as such deserve special management considerations. More than 500,000 visitors come to Denali each year, spending more than \$5 million in the local economy. High on their must-see lists is wildlife, especially wolves.

\* Currently the park wolf population remains at a near-record low: visitors' chances of seeing a wolf are a near-impossible 4 percent. A significant cause for the decline is hunting and trapping adjacent to the park. Proposal 141 would remove hunting and trapping pressure when the wolves are most vulnerable, during breeding season.

\* Proposal 141 should be approved with the following modifications: immediate implementation in the 2015-16 regulatory year; expansion to include the entire Stampede Corridor area; closure of the hunting season earlier, on Mar 15 or April 1st; and closure of both the hunting and trapping seasons on April 15.

\* Proposal 141, even if passed with all of the requested modifications, is **not** a substitute for a no hunting/trapping buffer zone adjacent to the park. It will not provide the same protection as a buffer and it is supported only as a partial, interim solution to offer a measure of protection to breeding wolves.

\* Without these changes in regulations, it is entirely possible another breeding female will be killed this spring. The result - as the NPS documented in 2015 - will be continued low wolf population counts and dismal prospects for visitors who come to Denali with the hope of seeing a wolf.

\* The Alaska Department of Fish & Game acknowledged that instances of wolves from the park being attracted to and killed at bear-baiting stations was an unforeseen consequence of a recent change in those regulations. Given the resulting impact on the area's already-low wolf population, the BOG has the duty to revisit the issue and correct the problem.

Submitted By  
Linda Shaw  
Submitted On  
3/4/2016 5:11:42 AM  
Affiliation

Phone  
907-790-2281  
Email  
[linda.rose.shaw@gmail.com](mailto:linda.rose.shaw@gmail.com)  
Address  
9684 Moraine Way  
Juneau, Alaska 99801

Dear BOG,

Please support Proposal 141 to shorten the wolf hunting season on State land adjacent to Denali National Park. I further support the addition of four modifications being proposed by the Alaska Wildlife Alliance and Denali Citizen's Council. Briefly these modifications are:

1. Apply the shortened hunting season to the remainder of the 2016 hunting season.
2. Include the entire Stampede Corridor (east to the Parks Highway) in the new regulation.
3. Change the hunting season closure to an earlier date.
4. Shorten the wolf trapping season to coincide with the shorter hunting season as indicated in #3, either March 15 or April 1.

I support these proposals because current management of the Stampede Corridor is devastating the wolf, and thereby ecosystem of Denali National Park. As an Alaskan who visits the Park, I am fed up with a small number of trappers and hunters compromising my ability to enjoy what should be a crown jewel of Alaska and the National Park System. I urge you to consider the interests of all Alaskans, and indeed the many visitors to Denali National Park who stimulate the Alaskan economy by adopting these measures to restore the ecological and economic value of Denalit National Park.

Thank you for the opportunity to comment.

Linda Shaw  
Juneau, Alaska



Submitted By  
Linda Wagner  
Submitted On  
3/4/2016 8:39:15 AM  
Affiliation

Phone  
615-833-5196  
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[lswagner@comcast.net](mailto:lswagner@comcast.net)

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141 Neese Dr, V452  
Nashville, Tennessee 37211

Proposoal 141 -Support with the addition of the four modifications as detailed in the comments submitted by the AlaskaWwildlife Alliance and the Denali CitizensCouncil. Please work with the National Park Service to sustain the existing wolf numbers within Denali National Park. Remove hunting and trapping threats that wolves are susceptible to during their breeding season when they move from park boundary lines into adjacent state land. The wolves are lured by bair bait stations and end up being hunted.

Beginning with the 2015-2016 regulatory year, expand expand protected area to all of the Stampede Corridor. End hunting season earlier at March 15 orkApril 1 and end hunting and trappingseasons on April 15. The Alaska Department of Fish and Game has noted the increased wolf mortality due to being ured by bear baiting sites and being killed. Ultimately, a buffer zone along park boundaries will be implemented. Park wolves numbers are dwindling . Alaska tourism depends on the 5 million dollars the 500 thousand tourists to the park spend just to see these wolves and other wildlife. Please support Proposal 141. Thank you for reviewing my comments.

Submitted By  
Louise Kane  
Submitted On  
3/2/2016 9:55:35 PM  
Affiliation

Phone  
508-237-8326

Email  
[louise@kaneproductions.net](mailto:louise@kaneproductions.net)

Address  
PO Box 148  
Eastham , Massachusetts 02642

I do not want to see wolves hunted on public lands. There are several proposed rules that I support now including restricting hunting seasons on wolves and protecting them in Denali. All American's have a right to be concerned about heavy handed, arahaic predator policies. Alaska stands as a shining example of how out of step some states are in enacting fair and biologically intelligent policies. Please don't hunt wolves and other predators. There is no valid managemnet purpose. and trapping has to go.

Submitted By  
Lynn Driessen  
Submitted On  
3/4/2016 1:18:55 PM  
Affiliation

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(920)832-5149  
Email  
[lawlady9@hotmail.com](mailto:lawlady9@hotmail.com)  
Address  
312 East Calumet Street  
Appleton, Wisconsin 54915

I strongly support Proposal 141 with the addition of the four modifications as detailed in the comments submitted by the Alaska Wildlife Alliance and the Denali Citizens Council.

The Denali wolves that den in the northeastern area of the park and cross the boundary onto state land are the most easily viewed wolves in Alaska and draw more than 500,000 visitors to Denali each year. Those visitors are eager to view wildlife, particularly wolves, and spend more than \$5 million in the local economy. Thus, the Denali wolves are an important financial, cultural and scientific resource that deserve special management considerations.

It is concerning that the park wolf population remains at a near-record low, greatly reducing the opportunity to see a wolf. Hunting and trapping adjacent to the park contribute significantly to that population decline. Proposal 141 would remove hunting and trapping pressure during breeding season, when the wolves are most vulnerable.

Proposal 141 should be approved with the following modifications: 1) immediate implementation in the 2015-16 regulatory year; 2) expansion to include the entire Stampede Corridor area; 3) closure of the hunting season earlier, on March 15 or April 1; and 4) closure of both the hunting and trapping seasons on April 15.

Even if Proposal 141 is passed with all of the requested modifications, it is **not** a substitute for a no hunting/trapping buffer zone adjacent to the park. It will not provide as much protection as a buffer, and I support it only as an interim solution to offer at least some protection to breeding wolves.

Absent these regulation changes, it is quite possible that another breeding female will be killed this spring. As the NPS documented in 2015, this would result in continued low wolf population counts and bleak prospects for visitors to view a wolf in Denali.

The Alaska Department of Fish & Game has acknowledged that wolves from the park are attracted to and killed at bear-baiting stations as an unforeseen consequence of a recent change in those regulations. The BOG has a duty to revisit the issue and correct the problem, as it has impacted the area's already-low wolf population.

I urge the Board of Game to vote "YES" to approve a shortened hunting season adjacent to Denali National Park to help protect wolves. It is heartbreaking that the park wolf population remains at a record low of approximately 50 wolves.

Submitted By  
Melanie Heacox  
Submitted On  
3/2/2016 9:49:48 AM  
Affiliation

~~Date: March 2, 2016

To: The Alaska Board of Game

Re: Proposal 141, an ACR for the Statewide Regulations Meeting in March 2016

From: Melanie Heacox, concerned citizen

Thank you for the opportunity to comment on a population of wolves that have international significance for both tourism and scientific study. I appreciate your willingness to discuss this topic during your upcoming meeting. While Proposal 141 is helpful, a comprehensive, no-hunting buffer zone is the only solution for the long-term protection of Denali Wolves. The Board of Game has established buffer zones in the past, and has the authority to do so now and in the future. I feel that buffer zones are the only way to ensure the ultimate protection of vulnerable wolf packs, especially those wolves who den in the eastern portions of the park. This in turn will increase the opportunity that visitors from around the world can view them.

The recent change in hunting regulations allowing for the taking of brown bears at bait stations, along with the lengthening of the wolf hunting season to May 31 has exposed wolves that are attracted to bait stations to increased and unforeseen harvest pressure in the Stampede Corridor within Unit 20C. Two wolves from the East Fork Pack were killed last spring, near a bait station, one of them a pregnant female.

Consider enlarging the size of the area covered by the regulation to include the entire Stampede townships up to the Parks Highway. This incorporates more of the wolves' range directly north of the park, all of which is open for bear-baiting.

Change the date of hunting season closure to an earlier date, to better protect pregnant females. Pregnant wolves can be afield as early as mid-March. Please discuss among yourselves the possibility of closing wolf hunting earlier, to protect these wolves on April 1st or March 15th.

Close wolf trapping earlier, to coincide with the closure of hunting. Under current regulations, trapping does not end until April 30th, there is no bag limit, and wolves can be shot from the trap line, putting pregnant wolves at significant risk. Whatever date you determine for closure of wolf hunting, I recommend that you close wolf trapping on that date as well.

Thank you for your time and willingness to consider these suggestions. Melanie Heacox, a concerned citizen.

Submitted By  
Michael J Boyce  
Submitted On  
3/2/2016 4:13:23 PM  
Affiliation

Phone  
340-513-1943  
Email  
[denalimike@yahoo.com](mailto:denalimike@yahoo.com)

Address  
Mi 229.4 Parks Hwy  
Denali Park, Alaska 99755

To The Board:

As a Denali Park resident, I am writing in support of Proposal 141 to protect Denali wolves. For too long, wolf management in the Denali area has been structured to benefit just the smallest handful of residents, at the expense of large numbers of residents who live and work in and around Denali, as well as the tens of thousands of visitors who visit the Park each year hoping to see a wolf.

For the benefit of residents, visitors, and scientific research, please approve proposal 141, and please extend further protection to these wolves wherever possible.

respectfully,

Michael Boyce



March 4, 2016

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

Submitted via email: [dfg.bog.comments@alaska.gov](mailto:dfg.bog.comments@alaska.gov)

**RE: BOG Statewide meeting – March 2016**

Dear Board of Game members,

Thank you for the opportunity to comment on proposals for the upcoming statewide meeting. Since our founding in 1919, the National Parks Conservation Association (NPCA) has been an independent, nonpartisan voice working to strengthen and protect our nation's natural, historical, and cultural heritage. Together with our one million members and supporters, of which 2,000 reside in Alaska, NPCA works to protect national parks for current and future generations.

For decades, NPCA has been working towards better protection of wolves that live primarily in Denali National Park but occasionally roam outside park boundaries. Re-instating a wolf buffer in the Stampede region remains a critical priority. Additionally, NPCA supports Proposal #141 as an important interim step towards solving this difficult, long standing issue.

**Proposal #141 - Support**

Shortening wolf hunting season so it doesn't coincide with bear baiting season will prevent the unintentional take of wolves that live primarily in Denali National Park.

We support this proposal for the following reasons:

- This change follows through with ADF&Gs emergency closure in spring 2015 for the same purposes.
- This proposal was supported by the Middle Nenana Fish and Game Advisory Committee by a vote of 5-2.
- Tourism is vital to Alaska's economy. The ability to view both predator and prey in a natural ecosystem is a prime motivation that brings visitors to Alaska and especially Denali.

**Alaska Regional Office**

750 W., 2nd Ave, Suite 205 | Anchorage, AK 99501 | P 907.277.6722 | F 907-277-6723 |  
[npca.org](http://npca.org)

- From 2010 to 2015 the number of Denali visitors seeing wolves declined from 45% to 5%.
- Unlike mortality from natural causes, wolf hunting frequently takes the alpha individuals which can result in disruption to pack cohesion and reproduction. This is most likely the reason the East Fork pack did not produce pups in 2015 (for the first time in over 28 years of monitoring) because of the collared East Fork male and pregnant female taken near a bait station that spring.

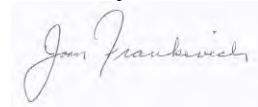
**Proposal #141, suggested modifications**

Additionally, we suggest the following modifications to Proposal #141.

- Apply this change to the remainder of the 2016 hunting season so that this proposal does not need to wait a year to go into effect.
- Extend the boundary to the Parks Highway – this is a relatively small addition that would afford better protection to park wolves and provides a concrete and easily identifiable boundary for hunters.

Thank you for the opportunity to comment.

Sincerely,



Joan Frankevich  
Program Manager

**Alaska Regional Office**

750 W., 2nd Ave, Suite 205 | Anchorage, AK 99501 | P 907.277.6722 | F 907-277-6723 |  
npca.org

Submitted By  
Nicole  
Submitted On  
3/3/2016 6:52:54 AM  
Affiliation

Re: Proposal 141. Visitors come to Alaska to see the beauty and the wildlife. The Denali wolves are a huge draw. Unfortunately, because of the very low population, they are harder and harder to see. This is largely due to trapping and hunting next to the park. Please approve proposal 141, but adjust it so that the hunting season ends earlier, on March 15 or April 1st, and that both hunting/trapping seasons end April 16. Also, it should be implemented for the 2015-2016 regulatory year right away, and should include the Stampede Corridor. Please implement this proposal to lower the damage to the wolves. If another breeding female is killed this season, it will decimate the future wolf population even further. Visitors will eventually stop coming to Alaska to see the wolves, and Alaska's economy will suffer. Thank you for your consideration.



Submitted By  
Patricia Baker  
Submitted On  
3/3/2016 7:43:40 AM  
Affiliation  
Donar

I support proposal 141 in addition to the four modifications as detailed in the comments submitted by the Alaska Wildlife Alliance and the Denali Citizens Council.

Submitted By  
Paula Jampsa  
Submitted On  
3/2/2016 8:41:48 AM  
Affiliation

Please protect the Denali wolves. The movements of these wolves have been plotted and mapped by the National Park Service under its ongoing wolf ecology program, which has collected an unbroken stream of data since the mid-1980s. These data show that, in general, wolves venture a certain distance, then return to the park, and a relatively limited buffer zone on state lands adjacent to the northeast corner of the park could effectively prevent pack disruption without significant loss of hunter/trapper opportunity. The Board of Game has established buffer zones in the past, and has the authority to do so now and in the future. We feel that buffer zones are the only way to ensure the ultimate protection of vulnerable wolf packs, especially those wolves who den in the eastern portions of the park. This in turn will increase the opportunity that tourists from around the world can view them.

Submitted By  
Gretchen Pederson  
Submitted On  
3/3/2016 2:17:21 PM  
Affiliation  
Mrs.

### **I URGE YOU TO SUPPORT PROPOSAL 141:**

I am a wildlife biologist by training and have spent 11 summers and one winter in or just outside of Denali National Park. I support all measures to provide protection to the wolf population in this region.

Tourists come from all over the world hoping to get a glimpse of these elusive predators.

These animals experience particular risks in spring, when more hunters are on adjacent state lands.

There is particular disturbance and disruption to social interactions of these intelligent creatures

if pregnant females are killed. I suggest that you end the hunting season by March 15<sup>th</sup> to offer better protection to these females. Also, the trapping season should end on the same date.

Proposal 141 is a useful tool, but the best solution for wolf management in this area is to have a comprehensive, no-hunting, no-trapping closure in the Stampede and Nenana Canyon areas.

Submitted By  
Robert L. Pederson  
Submitted On  
3/3/2016 2:16:12 PM  
Affiliation  
  
Phone  
5413880742  
Email  
[pandg@nwlink.com](mailto:pandg@nwlink.com)  
Address  
18925 Pinehurst Rd.  
Bend, Oregon 97703

### **I URGE YOU TO SUPPORT PROPOSAL 141:**

I am a wildlife biologist by training and have spent 11 summers and one winter in or just outside of Denali National Park. I support all measures to provide protection to the wolf population in this region.

Tourists come from all over the world hoping to get a glimpse of these elusive predators.

These animals experience particular risks in spring, when more hunters are on adjacent state lands.

There is particular disturbance and disruption to social interactions of these intelligent creatures

if pregnant females are killed. I suggest that you end the hunting season by March 15<sup>th</sup> to offer better protection to these females. Also, the trapping season should end on the same date.

Proposal 141 is a useful tool, but the best solution for wolf management in this area is to have a comprehensive, no-hunting, no-trapping closure in the Stampede and Nenana Canyon areas.

**From:** [Pete and Gretchen](#)  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Subject:** Yes on Prop.141  
**Date:** Thursday, March 03, 2016 2:06:52 PM

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## **WE URGE YOU TO SUPPORT PROPOSAL 141:**

We are both wildlife biologists by training and have spent 11 summers and one winter in or just outside of Denali National Park. We support all measures to provide protection to the wolf population in this region.

Tourists come from all over the world hoping to get a glimpse of these elusive predators. These animals experience particular risks in spring, when more hunters are on adjacent state lands.

There is particular disturbance and disruption to social interactions of these intelligent creatures

if pregnant females are killed. We suggest that you end the hunting season by March 15<sup>th</sup> to offer better protection to these females. Also, the trapping season should end on the same date.

Proposal 141 is a useful tool, but the best solution for wolf management in this area is to have a comprehensive, no-hunting, no-trapping closure in the Stampede and Nenana Canyon areas.

Sincerely,

Robert and Gretchen Pederson  
18925 Pinehurst Rd.  
Bend, OR 97703

Submitted By  
Sarah  
Submitted On  
3/3/2016 9:03:17 AM  
Affiliation

~~Please vote yes to Proposal 141.~~

I also support the addition of the four modifications to Proposal 141 as detailed in the comments submitted by the Alaska Wildlife Alliance and the Denali Citizens Council.

As a visitor to your state, wildlife and scenes are the number 1 reason for my/our visits. Upon our visit to Denali, we were disappointed that we did not see wolves in the wild, something I have dreamt of since being a child. Such a disappointment! The below points, although commonly voiced, are true and share my personal beliefs. They are valid points as to why the proposal and the 4 modifications are needed.

\*The Denali wolves that den in the northeastern area of the park and cross the boundary onto state land are unique: they are the most easily viewed wolves in Alaska. They are an important financial, cultural and scientific resource and as such deserve special management considerations. More than 500,000 visitors come to Denali each year, spending more than \$5 million in the local economy. High on their must-see lists is wildlife, especially wolves.

\* Currently the park wolf population remains at a near-record low: visitors' chances of seeing a wolf are a near-impossible 4 percent. A significant cause for the decline is hunting and trapping adjacent to the park. Proposal 141 would remove hunting and trapping pressure when the wolves are most vulnerable, during breeding season.

\* Proposal 141 should be approved with the following modifications: immediate implementation in the 2015-16 regulatory year; expansion to include the entire Stampede Corridor area; closure of the hunting season earlier, on Mar 15 or April 1st; and closure of both the hunting and trapping seasons on April 15.

\* Proposal 141, even if passed with all of the requested modifications, is not a substitute for a no hunting/trapping buffer zone adjacent to the park. It will not provide the same protection as a buffer and it is supported only as a partial, interim solution to offer a measure of protection to breeding wolves.

\* Without these changes in regulations, it is entirely possible another breeding female will be killed this spring. The result - as the NPS documented in 2015 - will be continued low wolf population counts and dismal prospects for visitors who come to Denali with the hope of seeing a wolf.

\* The Alaska Department of Fish & Game acknowledged that instances of wolves from the park being attracted to and killed at bear-baiting stations was an unforeseen consequence of a recent change in those regulations. Given the resulting impact on the area's already-low wolf population, the BOG has the duty to revisit the issue and correct the problem.

These are sound reasonings. I hope that you agree on this common sense and vote yes to Proposal 141 and include the 4 modifications.

Thank you,

Sarah

Submitted By  
Stephen Bartell  
Submitted On  
3/3/2016 4:11:29 AM  
Affiliation

Phone  
703-627-6961

Email  
[stephen@clearconscience.com](mailto:stephen@clearconscience.com)

Address  
3208 19th Road, N.08 19th Road, N.  
Arlington, Virginia 22201

As a visitor to Alaska, I support Proposal 141 with the addition of the 4 modifications submitted by AWA and Denali Citizens Council.

Thank you for considering my comments.

Submitted By  
Terry Grabow  
Submitted On  
3/2/2016 7:03:23 AM  
Affiliation

I respectfully ask that you approve Proposal 141 to shorten the wolf hunting season on state lands north of Denali National Park. Currently, the wolf hunting season runs from August 10-May 31st. Proposal 141 shortens it to run from Aug 10 - April 15th. I am in full support of shortening the hunting season.

I am Terry Grabow and I have lived in McKinley Village for 30 years; I own my home in what I believe is the most beautiful place on the planet. I am a wilderness tour guide in Denali National Park and Preserve and have driven the Denali Park Road for the past 30 years. I interact with literally thousands of tourists throughout the summer who ride my tour bus into the park. Their primary reason for visiting DENALI is to see wildlife in their natural environment. Their primary reason for visiting ALASKA - is to see wildlife in their natural environment. Visitors feel disappointed on days with low wildlife sightings; they feel cheated when I tell them wolf numbers are at such low levels that they probably will never see one. Last summer, I drove 120 miles per day into the park, 4-5 days per week, and my tour bus saw FIVE WOLVES the entire summer. My visitors walked away with a feeling of a wasted trip to Alaska, they felt as though the tourist brochures portraying bears and wolves gave them false hope of experiencing a wild place. For many of my visitors - the Denali Park Road is the "wildest" place they may ever experience in their lives. Wildlife sightings now a days are fewer and farer between than when I began driving the park road 30 years ago. The Denali Park Road really is one of the last places left on the planet where a visitor can ride on a bus for a day and have the opportunity to view grizzly bears, wolves, moose, caribou and sheep. That's what draws the visitors here - to view wildlife. And I think we can all agree that Alaska benefits financially from summer tourists.

This is the time to protect Denali wolves when more hunters are on state lands north of the park for bear baiting (season starts April 15th). I believe it is also important to protect wolves during a time when more pregnant females are afield. The risk to the wolves is not theoretical. Two wolves from the East Fork Pack were killed near a bait station last spring, one of them a pregnant female. These deaths resulted in an emergency hunting closure by the Alaska Department of Fish and Game.

I want to remind the Board of Game, that although Proposal 141 is helpful, a comprehensive, no-hunting /trapping closure of lands in the Stampede and Nenana Canyon areas is the only solution for long-term protection of Denali wolves.

I believe that there are members of the Board of Game who would support this.





Submitted By  
Veronica  
Submitted On  
3/3/2016 10:06:38 AM  
Affiliation

Please make an effort to save the Denali Wolves. If another breeding female is killed, it will have a huge impact on the future wolf population in Alaska, which is already very low. Please learn from Yellowstone's history and save your ecosystem-  
<http://www.yellowstonepark.com/wolf-reintroduction-changes-ecosystem/>



WRITTEN COMMENTS TO THE ALASKA BOARD OF GAME, MARCH 2016 MEETING

RE: PROPOSAL 141--5 AAC 85.056 HUNTING SEASONS AND BAG LIMITS FOR WOLF

I strongly SUPPORT Proposal 141 and urge you to adopt it.

As a former Game Board member, a wildlife biologist who has done research in Denali National Park for thirty-seven years, and a forty-two-year resident of Alaska, I offer the following comments on Proposal 141.

The issue of protecting wolves living mainly inside Denali but venturing out of the park in winter has been prominent for decades. Documented losses of Denali's wolves to hunters and trappers have occurred frequently since wolves were first radio-collared in 1986. The Board responded to widespread public concern and established a variety of no take buffers adjacent to the park (including along portions of the Stampede trail) starting in 2000. But in 2010, despite strong support for modifying buffer boundaries to expand protection, the Board abolished the buffers.

Since 2010, several import members of different wolf packs have been trapped or shot leading to disruption or disintegration of the packs. Park Service research has documented a sharp decline in wolf viewing in the park as a result.

The latest developments include wolves shot at bear baiting stations along the Stampede Trail during spring. This occurred because the wolf hunting season extended to May 31, well within the bear baiting season.

Proposal 141 submitted by the Park Service proposes to close the wolf hunting season on April 15. The justification for the proposal provided by the Park Service contains the rationale for proposing this regulation change.

If the Board adopts this proposal it should also facilitate applying the change to the 2016 hunting season, whether by recommending an ADF&G emergency closure or some other means.

The Board should also consider changes to the trapping regulations to shorten the open season during spring. The current season runs until April 30 exposing Denali's wolves to the losses Proposal 141 is designed to prevent during a time when female wolves are pregnant and their loss would again affect pack cohesion and viewing within the park.

If additional park wolves are taken along the Stampede Trail should the Board fail to adopt Proposal 141, strong public reaction with negative impacts on the Board would result. Adopting this proposal would have a very small impact on hunters but potentially a very large impact on the cohesion and persistence of the wolves observed within the park by millions of visitors over the course of many years.

I urge you adopt Proposal 141 as a small step forward toward resolving this long-running, controversial issue.

*V. Van Ballenberghe*

*March 3, 2016*

Vic Van Ballenberghe, Anchorage, Alaska

Submitted By  
Jerry L Fairchild  
Submitted On  
3/3/2016 3:58:15 AM  
Affiliation

Phone  
9072623738

Email  
[bonniebarbee@mail.com](mailto:bonniebarbee@mail.com)

Address  
24850 Vega St.  
P.O. Box 302  
Kasilof, Alaska 99610

This message pertains to the new opening dates for Copper Basin Moose Community Subsistence Harvest (CSH). The opening dates used to coincide with Tier 1 Caribou hunt opening which is [August 10](#). We now have four different opening dates for the CSH, with only one date that coincides with the Tier 1 caribou opening. According to the Alaska Legislation that was first passed in 1978, it established subsistence as a Priority. The boards must adopt subsistence regulations for reasonable opportunity for subsistence users First before providing for user groups. AS.16.05.258(b). So why the change! I was told that the general hunters group complained, so the board changed the opening dates to accommodate the general hunter group. I feel very strongly that this is a slap in the face to the subsistence users of this hunt. I would greatly appreciate that if during your statewide meeting in Fairbanks, [March 5, 2016](#), that this subject be revisited and return the opening date to [August 10](#) opening date for all units of the Copper Basin Moose CHS [starting August 10](#) of 2016. The dates can be easily changed electronically for little no cost and forwarded on to the coordinators of each group to pass it on to their group members. The quotas for each Unit can be adjusted to help relief any pressure in over hunted Units

Thank you for your time and consideration on this matter=

Submitted By  
Sheila  
Submitted On  
3/2/2016 9:26:17 AM  
Affiliation

Phone  
907-243-3873

Email  
[sheandc@gci.net](mailto:sheandc@gci.net)

Address  
3401 Woodland Park Drive  
Anchorage, Alaska 99517

~~This message pertains to the new opening dates for Copper Basin Moose Community Subsistence Harvest (CSH). The opening dates used to coincide with Tier 1 Caribou hunt opening which is August 10. We now have four different opening dates for the CSH, with only one date that coincides with the Tier 1 caribou opening. According to the Alaska Legislation that was first passed in 1978, it established subsistence as a Priority. The boards must adopt subsistence regulations for reasonable opportunity for subsistence users First before providing for user groups. AS.16.05.258(b). So why the change! I was told that the general hunters group complained, so the board changed the opening dates to accommodate the general hunter group. I feel very strongly that this is a slap in the face to the subsistence users of this hunt. I would greatly appreciate that if during your statewide meeting in Fairbanks, March 5, 2016, that this subject be revisited and return the opening date to August 10 opening date for all units of the Copper Basin Moose CHS starting August 10 of 2016. The dates can be easily changed electronically for little no cost and forwarded on to the coordinators of each group to pass it on to their group members. The quotas for each Unit can be adjusted to help relief any pressure in over hunted Units

Thank you for your time and consideration on this matter=

Submitted By  
Randall L Holt  
Submitted On  
2/22/2016 10:39:29 AM  
Affiliation

Phone  
907 357-5077  
Email  
[rdy2retr@mtaonline.net](mailto:rdy2retr@mtaonline.net)  
Address  
2081 Fleet St.  
Wasilla, Alaska 99654

Dear Board Members,

This message is in regards to the Copper Basin Moose CSH. The opening dates used to coincide with Tier 1 caribou hunt of Aug. 10 opening. Now we have 4 different dates to open, with only one area coinciding with the Tier 1 caribou hunt. All hunting and fishing regulations regarding subsistence, used to take priority over general hunts and fishing, so why the change! I was told the general hunters complained so the board changed the rules to accommodate the general hunters, I feel very strongly that this is a slap in the face to the subsistence users of this hunt. I would greatly appreciate that if during your statewide meetings that this subject be revisited and the dates be returned to the Aug. 10th opening dates for all areas of the Copper Basin Moose CSH starting Aug. 10 of 2016. The dates can be easily changed electronically for little to no cost and forwarded on to the coordinators of each group. The quotas for each area can be adjusted to help relieve any pressure in over hunted areas.

Thank you for your time and consideration on this matter.

Submitted By  
alessandro ciccarelli  
Submitted On  
3/1/2016 5:47:28 PM  
Affiliation

Phone  
(860)-416-7942  
Email  
[alciccarelli@gmail.com](mailto:alciccarelli@gmail.com)

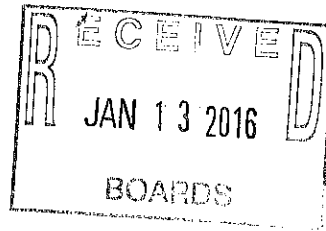
Address  
38 candy lane  
bristol, Connecticut 06010

Dear Sir or Madame,

I am writing to express my concern over the dangers posed to wolves by removing all protections against them. We have a duty to preserve the wonders of nature bequeathed to us by previous generations. The Board should strengthen laws against trapping, hunting and the prolonged suffering of these majestic creatures!! Without the wonders of nature, Alaska may become a paradise lost.



Lisette Barnett  
5203 West Bowles Place  
Littleton, CO 80123  
November 17 2015



Kristy Tibbles  
Alaska Department of Fish and Game  
PO Box 115526  
1255 West 8th Street  
Juneau, AK 99811-5526

Dear Kristy Tibbles,

I am writing you today because I do have a couple of issues with the decisions Alaska has made when it come to the hunting of wolves. I am pleased to say I am very proud of what has been done so far with new protections have been placed on the wolves with one of the newest “banning hunting practices made that manipulate or change predator populations in national parks and preserves” (Langlois, New Protections). Unfortunately, this law will not lend enough protection that these wild creatures need. There needs to be more restrictions being set into place. With the new law, “It prohibits the baiting of brown bears, the killing of wolves and coyotes when pups are in tow, and the use of artificial light to kill black bears in their dens”(Langlois, Predator Control). Thus allowing some restrictions but not enough to protect these wild animals. These predators aren't hurting the community enough to affect the quality of human life.

Wolves do what they know, they aren't harming anyone or purposefully attacking caribou for fun. They are doing what they can within their means to survive. When a wolf colony begins they find a den, and furthermore find food and begin to grow and produce pups. With the previous hunting laws in place they had been gunned down and almost driven back to where there is no one to help them continue to survive. As the wolves survive they eat caribou and seem to keep a stable and healthy population for them. With the wolves taking a home to Alaska food is what some see as a struggle, “the Fortymile caribou herd is also an important food source for thousands of Alaskans. And because it’s widely accepted that fewer wolves equals more caribou”(Langlois, New Protections). The wolves do not consume enough of the caribou for it to become a detrimental and community breaking scavenge. They tend eat the slowest and some young babies as well. With this they contain the herd and consume diseased and unfit caribou helping themselves and creating a stronger community.

The problem that then continues to occur is a year round consistent hunting will continue to die out the population of these great animals. Reproduction is a value that all animals share and continue to use as a basic necessity for survival. The wolves have no chance for reproduction



as they are hunted year round. Wolves only mate once a year and it is only the alphas in the pack that do mate. The wolves are on a very thin line between survival and a quick demise.

As states like Montana and Colorado begin to get wolves also should we treat the same as Alaska has for the past 5 years. Machine gunning and chasing them down the moment they cross an invisible boundary they weren't aware of is an unfair act of hunting. Their needs to be a compromise and more so a basic knowledge taught to the people of what these animals do and how we should protect them rather than mass murder these creatures. As all they try to do in the end is survive just as if they were beavers or caribou all these creatures need is respect and a little help.

With myself, being a hunter, I do see the need to control populations and monitor the effects. Animals such as deer and elk are also hunted without many protections. All I ask is that we give the Wolves the same protections as game animals like elk and deer are allotted. They do need help and protections should be in place whether they are a predator or not. A hunting season should be in place rather than a free for all year round hunt with no bag limit. These limits and restrictions save these creatures and help them continue to prosper as well as render a natural population limit to the caribou.

Solutions to the problem will be hard but it can be done. First is to at least place a bag limit on the wildlife being hunted due to the fact they are no longer over populating one area. Next would be to create a wolf hunting season which at least lends time for recover after the hunting season helps them reproduce and lend new genes to be spread. With the options mentioned it, will lend a fair game and allow hunters to continue the process of cleaning a population and allow it to prosper.

With no protection laws it allows states such as Montana and Colorado to decide how to handle their upcoming wolf population problem. Thus, paving a way in an unknown direction that could lead to the extinction of all wolves. Alaska would be the state that would originally offer solutions to help monitor these gracious creatures, hopefully lending a path to a safer future for the wolves.

Sincerely,

Lisette Barnett





### Works Cited

Langlois, Krista. "Alaska's Wolves and Bears Get New Protections." *High Country News*.

*High Country News*, 28 Oct. 2015. Web. 11 Nov. 2015.

Langlois, Krista. "Sweeping New Rule for Alaska's Predator Control." *High Country News*. High

*Country News*, 11 Sept. 2014. Web. 11 Nov. 2015.