

Alaska Board of Game

On Time Public Comments

Work Session
Juneau, Alaska
January 8, 2015

ALASKA BOARD OF GAME

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On Time Public Comment Index

Ken Wegner	PC001
Jack Reakoff.....	PC002
Alaska Outdoor Council	PC003
Mike Peterson	PC004
Donald Lee III.....	PC005
Greenpeace, Center for Biological Diversity, The Boat Company, Cascadia Wildlands.....	PC006
Denali Citizens Council	PC007
Multiple Authors*	PC008

**The authors of PC008 did not reference any subjects that will be taken up at the Work Session and they are therefore not cross referenced on the On-Time Comment Index.*



Submitted By
Ken Wegner
Submitted On
12/11/2014 5:30:07 PM
Affiliation

Phone
503-292-2554

Email
ken.karen123@gmail.com

Address
10640 NW Laidlaw rd
Portland, Oregon 97229

I understand that you are considering going from a 2 year cycle to a 3 year cycle for consideration of regulation changes. While I understand that this may save time and possibly some money, I do not feel it is in the best interest of hunting or the big game animals. Animal populations can change quite significantly in a given area over a three year period of time, and 3 years seems quite a long time to react to that with regulation changes. The current 2 year cycle feels much more appropriate. Thank you for your consideration of this perspective.



Submitted By
Jack Reakoff
Submitted On
12/11/2014 10:35:07 AM
Affiliation
Koyukuk River AC

Phone
907-678-2007

Email
wisemanwolf@gmail.com

Address
114 Newhouse Street
Wiseman Village, Alaska 99790

Hi Kristy,

I am commenting on the BOG meeting cycle change to every three years instead of two.

After a lot of consideration I feel it is fiscally advantageous to the State to change the meeting cycle to three years. I also feel the AC's can be overwhelmed when the BOG and BOF overlap on the same year. For rural AC's that have higher travel costs, and time constraints, it would be better to concentrate on fish or game issues independently. The schedule portrayed in the Board Support Q&A on proposed changes has a clean transition. I do feel the ACR mechanism will allow AC's, the public and the Department to address unforeseen issues.

These are my opinions as the Koyukuk River AC has not taken a position on this issue.

Jack Reakoff



Alaska Outdoor Council Alaska Fish & Wildlife Conservation Fund

310 K Street, Suite 200
Anchorage, Alaska 99501
Phone: (907) 264-6645 Fax: (888) 932-3353
e-mail: aoc@alaskaoutdoorcouncil.com
web: www.alaskaoutdoorcouncil.org



December 26, 2014

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ATTN: Board of Game, Work Session, January 8, 2015
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Alaska Board of Game Work Session January 8, 2015

The Alaska Outdoor Council (AOC) appreciates the opportunity to provide public comment on reports and updates being presented to the Alaska Board of Game (board) at the January 8, 2015 Work Session. AOC represents 48 outdoor clubs, approximately 10,000 Alaskan residents, who hunt, trap, fish, and recreate on public lands and waters in Alaska. AOC provides the following comments on these agenda topics:

6) Brown Bear Hunting Closure on the Kenai National Wildlife Refuge

7) National Park Service Compendium Process and Regulations

It's clear that the U.S. Department of the Interior has no qualms about usurping state management of public resources on federal lands and waters in Alaska. It's up to the state to fight to retain the sovereign rights it was granted at statehood. As an arm of the Alaska State Legislature the board is obligated to support state management of game on all lands within the state. AOC believes that the best way to preserve the Alaskan way of life and outdoor lifestyle is to oppose creeping federalism and the erosion of Alaska's states' rights with every means at disposal. AOC supports all efforts by the board to encourage the state administration and the Alaska Congressional delegations to pursue all legal avenues possible, including litigation, to retain state management of wildlife on NPS and USFWS lands.

9) Wood Bison Reintroduction

After reviewing the first draft of the Lower Innoko/Yukon River Wood Bison Management Plan AOC provides these comments to the AK Board of Game (board). AOC has supported the reintroduction of wood bison to the Yukon Flats since the plan was first conceived by the Alaska Department of Fish & Game (department) in 1992. While the original reintroduction site has been thwarted by Doyon Limited, because of concerns over resource development on their lands should wood bison be present, AOC has remained in support of a wood bison reintroduction in Alaska.

"Protecting your Hunting, Trapping, Fishing and Access Rights"
The Official State Association of the National Rifle Association.



AOC does have concerns regarding the remoteness of the lower Yukon release site and the landownership in the area. The cost to the state for transplanting, monitoring, and managing wood bison will all be exacerbated by the remoteness of the currently chosen release site. Should Fish & Game funds go toward this project AOC members would like to have some assurance of the benefits from the use of those funds by being allowed to harvest wood bison. Also AOC membership would not like to be penalized due to a lack of Fish & Game funds needed to support state wildlife management projects currently underway to increase hunting opportunity because of funding of the wood bison reintroduction project. It's hard to argue against the fact that the current chosen release site on the Lower Yukon is at the extreme limits of wood bison's known historical range. Apparently the possibility of choosing another release site more accessible to all Alaskans for the reintroduction of wood bison has been taken off the table.

The board should pay close attention to Goal 5, The management of harvest allocation to benefit local residents and non-local residents. The board should be very cognizant of not treading on the common use clause enshrined in the Alaska State Constitution, Article 8 Section 3.

Goal 5, Objective 4 - Requests that the board not establish hunting regulations that would allow hunting of wood bison during the moose hunting season. Is this request referring to the state moose hunting season from September 5 - 25th? Or the federal moose hunting season of August 25 - September 30 and February 15 - March 15 on federal lands? Or both? This objective could further restrict non-local hunting opportunity by pushing the hunting season later into the fall season.

Goal 5, Objective 6 - Avoiding positive customary and traditional use findings under both state and federal regulations is an admirable goal which AOC supports strongly.

AOC believes the draft plan, Goal 6, may be underestimating the significant negative impact of wood bison on other species in the release area. The value and importance of the moose harvest to residents of the lower Yukon River is well documented. ADF&G has little data to draw from that suggests that unlimited growth of the wood bison herd in the area would not negatively impact the local moose population. What would ADF&G do should there be a negative effect on the moose population caused by the newly introduced wood bison herd? What assurance is there from the U.S. Fish & Wildlife Service that should wood bison negatively affect moose population in the Innoko NWR that they wouldn't block expansion of the wood bison herd on to the Refuge?

AOC membership is hopeful that by bringing these concerns to the board's attention that it will help resolve future conflicts concerning the goals and objectives of the Lower Innoko/Yukon River Wood Bison Management Plan.



10) Dall Sheep Survey Report

AOC has concerns on how the board intends to use the Dall Sheep Survey Report data when deliberating on proposals addressing sheep hunting regulations and allocation scheduled for the 2015 Alaska Board of Game meetings.

The data gathered in the Dall sheep survey represents a small portion of the sheep hunting public of 5,901 resident sheep hunters in the last 5 years. Less than 2,000 resident sheep hunters were asked to provide survey information, of these, less than 1/2 responded. For the board to take action on proposals based on responses from around 10% of the resident sheep hunters in the last 5 years would fall short of the constitutional requirement of providing the maximum benefit of Alaska's people, Article 8, Section 2.

AOC would rather the board take into account the "sustained yield" mandate for action enshrined in the Alaska State Constitution, Article 8, Sections 2, 3, and 4.

Lieutenant Governor John B. Coghill, an Alaska Constitution Convention delegate, stated it best in his executive summary regarding "Sustained Yield" published in 1994:

"Management of Alaska's resources on the "sustained yield principle" sets consumptive human use as the highest priority for replenishable resources. Establishing resource management policies and principles at the constitutional rather than the legislative level protects resource agency practices from immediate political influence and the changing nature of public sentiment in an ever more urban population. Individuals and groups desiring to influence resource management policies need to clearly understand the policy and principles of resource management set in the State's Constitution".

A minority of individual resident sheep hunters wishing to limit hunter participation in order to satisfy their personal aesthetic values of what a Dall sheep hunting experience should be like does not fulfill the statutory requirement of meeting the maximum benefit of the people. The board needs to keep the constitutional mandate for utilizing public resources in mind when considering adopting proposals to reduce hunting opportunity for purely aesthetic values.

12) Copper Basin Area Subsistence Hunting Committee Report

One of the main purposes of AOC is to insure equality in access and use of the publicly owned natural resources that its membership depend, AOC By-law Article 3, number 2.

On the 63% of the state that is federally owned lands equality in access was made unachievable by federal law, ANILCA Title VIII. By law private lands, 12.1% of the state, are not required to provide equal access to the public. That leaves less than 25% of the state where public access to public resources can be achieved. The Alaska State Constitution, Article 8, Section 3 Common Use requires that the board should make every effort to provide equality in access to game on state public domain. The Copper Basin Area Community Subsistence Hunting (CSH) regulations adopted by the board



will not allow all Alaskans to participate in the regulated harvest of caribou and moose in GMU 13. The board should repeal the Copper Basin CSH regulation.

AOC representatives will make themselves available at the Board of Game January 8, 2015 Work Session should board members have any questions regarding AOCs positions on these important topics.

Sincerely,

Rod Arno

Executive Director
Alaska Outdoor Council

Bill Iverson

President
Alaska Outdoor Council



To the Board of Game

December 26, 2014,

Good Morning,

At the upcoming January 8th Board of Game (board) work-session meeting, the board will consider changing its meeting cycle from two to three years. Statewide topics are currently on a four year cycle, and the board will need to decide to consider statewide topics on a three or six year schedule. I'm assuming that Cycle "A" and Cycle "B" would be combined into a single Statewide Regulation meeting.

I did some online research regarding the number of statewide proposals submitted for board action. In 2010 the board spent four days discussing 52 Cycle "A" proposals: eleven were submitted by the Dept. of Fish & Game; one by Enforcement; and nine by Advisory Committees. In 2012 the board had six days to discuss 103 Cycle "B" proposals: fifteen submitted by Fish & Game; one by Enforcement, and eight by Advisory Committees. 2014 saw the board with five days to discuss 54 proposals: nine submitted by Fish & Game, four by Enforcement, and 2 by Advisory Committees. A four year average of Cycle A and Cycle B proposals is 156.

My point is...a 6 year meeting cycle would be quite a long time between submitting and discussing statewide topics and it could have the following unintended consequences: a) a backlog of proposals; b) undue pressure for Board Generated Proposals, Agenda Change Requests, and Emergency Orders; c) a weakening of statewide proposals; d) conservation, development, and allocation issues stretching out; e) budgets could become bigger with a 6 year cycle; and f) it is conceivable that a newer Board member might not hear any statewide proposals.

I urge the Board of Game to support a 3 year statewide topic cycle.

Submitted by Mike Peterson Douglas Alaska.



To: the Board of Game regarding changes to sheep hunting regulations.

From: Donald Lee III. (907)347-6975

20+ years experience sheep hunting on foot in 5 distinct areas of the state
Former member and writing contributor to the Alaska chapter of the FNAWS.

Thankyou for taking these comments/ideas into consideration. I filled out Todd Brinkmans survey, attended the presentation of those results and have been to several recent AC meetings both in Tok and Fairbanks. I am a little concerned with proposed changes to regulations that I see coming out of some of these meetings. There are also some good ideas but I want to remind the board that the survey results spoke to hunters' desire for the opportunity to hunt sheep. "Opportunity to hunt sheep every year" ranked very high on the survey. Lets be careful, as we consider changes to the regulations, to do what we can to preserve both opportunity and resource. I would also like to encourage the board to only cater to opinion and perceptions when it is not at the expense of the resource....no matter how crowded hunters may feel the field to be. For example it's clear that hunters who answered the survey may not have the facts straight when it comes to crowding. Page 4 of the responses shows that hunters felt crowding was an issue due to among other things, more nonresident hunters, more professional transporters, more resident hunters, and more Alaska residents with planes. I would hazard a guess that at least in these four areas. these are simply perceptions and not the reality. When it comes right down to it...this is about the sheep. Sheep, I feel (and the surveyed public felt) to be declining/in trouble. We know for a fact that weather in Alaska is changing (warmer...more rain and ice on the mountains during the winter, receding glaciers etc) and I think this among other things is severely affecting sheep. Yet most of the resources and funds available to ADFG are spent/used for moose and caribou. If sheep are the resource in trouble...then the funding structure needs to change. It is my sincere hope that there will increasingly be monies available for getting a good data set with regularity so that ADFG and the public *know* what is actually going on with sheep. Too often it is heard and said, "Well....we don't really have that information," when questions about the health of Alaskas sheep are concerned. Lets preserve the resource....otherwise hunting sheep and crowding and airplanes spotting sheep during the season....will not matter a hoot! With that being said here is my list of ideas based on what I have heard, observed, and participated in.

FUNDING:

I realize that some of the funding issues are legislative issues and not necessarily BOG issues. However, as the BOG, you have the power to submit proposals to the legislators of our state. I would encourage you to be persistent with this regardless of your success or lack thereof in the past.

- 1) Do away with 5A licenses or somehow find a way to monitor residency so that the level of abuse when it comes to these licenses is decreased.
- 2) Institute a resident tag fee for sheep and grizzly statewide. Tag fees were broadly supported in the Sheep Hunter Survey. Another twist on this however might be to only have *successful resident* hunters pay the tag fee. I mention this, because despite being an avid sheep hunter and spending considerable time and effort doing so, I have taken 5 sheep in my twenty years of hunting them. I have hiked sheep out of the mountains for close to 40 miles on solo hunts so I know what it means to work for a sheep. And yet I have taken approximately one sheep every 4 years. If tag fees were as high as \$100 (as some have suggested should be the case), I wouldn't be too thrilled with having paid \$2000 for the privilege of taking 5 sheep. I also mention tag fees with reservation because I already worry about sheep hunting becoming a rich mans game (look at other states as a ready example). I think however that a tag fee should be instituted. I think it should either be based on success or should be fairly modest and in the range of 20-50\$.



I DO NOT feel that *license* fees should go up. What if, for instance I just want to do a little duck hunting each fall. However, tag fees, reflective of what is being hunted, should be instituted.

- 3) Allow hunters to apply for more than 3 drawing hunts. This would certainly help raise funds. If I could apply for 6 or 10 sheep hunts I would! I dare say most sheep hunters would.
- 4) Realign some priorities to funnel more funds to sheep research. For instance consider discontinuing the expense of aerial wolf and bear control. You could probably place large bounties on both and still save money. Put a \$1000 bounty on wolves and you'll have people out there working at getting them. I have a good paying job and I'd take the winter off to trap wolves if there was that kind of bounty! Fuel for helicopters is not cheap. Maybe the price of this aerial gunning should be publicized.....
- 5) Increase fees that guides must pay to the state

CROWDING and NONRESIDENTS:

I would caution that care be taken with the survey results in this case. As was mentioned in the meeting, every sheep hunter thinks that he should be the only one on a mountain covered with full curl rams. Many people these days, including hunters, have become increasingly soft and don't have the nerve or backbone to really work for a sheep. How do we know whether or not that fact is some of what is being seen in the "crowding" results of the survey. If the majority of hunters just want to cruise on their fourwheeler off the highway to some place where they might be able to take a sheep in a day or two and where everyone else did the same...they *should* expect crowding.

- 1) There was an idea looked at by the Tok AC that I thought was an excellent idea although I have put my own twist on it here. Hunters in the survey were not really in favor of more drawing hunts yet I see a lot of ideas for more drawings coming out of the ACs because of the desire to reduce crowding. So...here's an alternative. Lets divide the general season down the middle or close to it. For instance maybe the second portion of the season can be slightly longer due to potential weather issues. So...divide the general season statewide with perhaps the Brooks range being the exception. Say Aug 10-25 and Aug 26-Sept 20. Then allow hunters with last names starting with A-M to hunt the first portion of the general season on even-numbered years while hunters with last names N-Z hunting the second portion of the general season on that even numbered year. The following year it would be reversed and so on. That way when I come in for a tag, ADFG would simply need to look at my name and then issue me the season-appropriate tag. Such a system would not require a new computer program to keep track of. This system would also reduce crowding immediately, would not just displace the crowding to a different portion of the season (which is a drawback of many of the proposals I've seen), and would not reduce opportunity. The only drawback I can come up with in this scenario might be that someone with a last name starting with 'L' might want to hunt with someone with a last name starting with 'R' for instance. I have not come up with a good idea on how to deal with that, nor have I decided it needs to be dealt with. Concessions are going to have to be made if we all wish to keep hunting sheep.
- 2) All nonresidents should have to apply for sheep tags. Institute a statewide drawing for nonresidents. Is there *any* other state where nonresidents can get sheep tags over the counter? For that matter is there any other state where *residents* can get sheep tags over the counter? We don't want to become like other states!
- 3) Decrease (slightly) nonresident allotment of tags for all drawing hunts.
- 4) Cap the numbers of allowable guides in this state and mandate that they be residents of the state in order to guide here! And only allow them to claim/use/guide in certain portions of the state. They should not be allowed to guide wherever they want to. There definitely has to be



something done about guides right along with airplanes. I will say I have been pleased that guides have been involved in this process and for the most part seem to be contributing and suggesting things that the average foot hunter would agree with. I applaud them for that but still think their numbers and access should be restricted. Sheep need to be available to people who cannot pay 15-20 grand for the privilege.

AIRPLANES:

Something definitely must be done about the use of airplanes! Supercubs can increasingly land almost anywhere and the really big sheep in many units are well known to anyone who has access to a plane or who may guide in the area. I drew a TMA tag for instance several years ago. I was told by a flying friend exactly where a big ram had been hanging out and then was told that a guide in the area knew exactly where the ram was too and would likely be all over it opening day. Indeed this was the case. I think it turned out to be a 43inch ram. Probably a non-resident took the ram as most of the people who hire a guide to hunt the TMA are nonresidents. As a resident who hunts on foot....this was super exasperating. It made me feel like I never really had the chance to take a trophy ram because I do not have the funds to hire a guide, or scout from the air. I think some of the sentiment against airplanes is also an expression of frustration that sheep hunting (or at least successful sheep hunting) is increasingly becoming a rich mans game.

- 1) Prohibit hunting after having flown in an airplane until at least 12 noon following the day one has flown in an airplane. Even better would 24hrs (midnight) following the day one has flown in an airplane and a 24hr regulation actually had more support than a 12hr rule in the survey.
- 2) Absolutely prohibit spotting/surveying sheep from an airplane during the season and even better would be to prevent such from occurring for up to a week prior to season. Give the sheep a fighting chance! For instance in the TMA...perhaps there should just be no flying allowed for the week directly prior to opening day. If a guide is seen flying in the TMA during that week...he should be cited. Something like this is very black and white and enforceable and is what needs to occur. You can't mandate flying elevations (like the park has) etc because how are you going to enforce it? It would be a regulation without teeth. Circling sheep would also be hard to enforce. Maybe the pilot would tell you he was just trying to gain elevation. Think carefully about what to do with airplanes but do something and make it enforceable.
- 3) Increase fines for hunters who are complicit to crimes like spotting sheep during the season (if that becomes law) If I'm flying in with a guide for instance and he circles some sheep on our way in...I should as an ethical hunter, report him or expect to suffer the consequences myself. Correspondingly increase teaching of hunters with regard to the laws and consequences of being complicit to a crime. Maybe nonresidents should be required to watch a quick instructional video at ADFG before embarking on their hunt.

SEASONS:

- 1) Do not make the season start any earlier. Heat and getting sheep meat out of the field is already an issue and making the season earlier would exacerbate this problem. It was 70-80 degrees during my hunt last year and I had a hell of a time getting my sheep out fast enough to keep the meat in good shape. I did it but would not have wanted to be out there one single day longer. It was a verified 90 degrees for two days of my hunt the year before that! 90 degrees!
- 2) Consideration could be given to delaying the opening date for nonresident hunters (for instance 5 days into the season) so that only resident hunters get the first real opportunity to harvest a sheep

NON-MOTORIZED in relation to GUIDES:



- 1) Please make more of the non-motorized areas off limits to guides. Tonsina and Glacier Mountain for instance should be off limits to all guides! Non-motorized hunts really cater to people who don't have the resources to fly an area before season, or pack in with horses etc etc. Non-motorized should be synonymous with resident, non-guided hunter, walk-in opportunity only.
- 2) I also feel that more non-motorized areas should be created. Especially in areas surrounded by roads/highways. I personally feel that at least a portion of the TMA should become non-motorized similar to the DMA including off limits to airplanes. And the nonmotorized portion should include some areas that are known to hold big rams.

FULL CURL vs ??

Finally...lets get smart here! Why have we not gone to an “any ram” or even an “any sheep” regulation for most if not all drawing hunts? Lets protect some genetics! Granted a few more sheep would be killed but it would be in a more balanced manner than only allowing full curl rams to be killed. It would also be in areas where managers have full control over how many sheep are killed during the season. Drawing areas only. You have only to look at the record books to see that, in general, the size and availability of big rams is decreasing. And lets face it...despite how delicious everyone tells you sheep meat is, sheep are not targeted for their meat. Talk to your biologists. I think many of them would support this.

In summary:

- 1) Please be careful about starting a trend toward more drawing hunts. This would decrease opportunity and as such, was not supported by the survey
- 2) Institute tag fees and aggressively pursue increased options for funding. Please pursue funding! If resources and manpower are a problem then partner closely with ethical hunters who can give you non-biased feedback. Many sheep hunters are completely rabid about hunting sheep and would be very willing to contribute to keeping sheep hunting in a healthy state. Consider deputizing hunters so they can start the reporting/citing process in the field when they see violations. I have reported and tried to report three different hunters/hunting parties over the years. If I would have been deputized to some extent I probably could have helped secure convictions for all three parties. As it was only one individual was successfully cited (for shooting a sublegal ram). The other two parties were violating the law with regard to non-motorized access. Despite my taking pictures...they got away with it.
- 3) Divide the general season and make hunters alternate which period they hunt between years either by name or year. This would effectively and immediately reduce crowding but would not reduce opportunity.
- 4) Severely restrict airplane usage. Lets remember our sheep are white...they are easy to see from the air. There's really no hiding if you're a sheep when it comes to airplanes. The planes can land nearly anywhere. This is a case of protecting the resource!

Thankyou for this opportunity to comment. I'm including a picture of my fifth ram to get you all fired up. Being able to hunt sheep is really such an amazing opportunity. Lets do what we can to keep or make it an opportunity for everyone and yet remember at the same time that it should not be a free or responsibility-free opportunity.

Best Wishes!

Donald Lee III



• **Greenpeace** • **Center for Biological Diversity** • **The Boat Company** •

December 26, 2014

Alaska Board of Game
c/o ADF&G, Boards Support Section
dfg.bog.comments@alaska.gov

Subj: (1) Comments on Proposals 12, 14 and 26 for the January regulatory meeting;
(2) Comments for the January 8 workshop meeting.

Dear Board of Game members;

Please consider these comments when you meet in Juneau. The page count of these comments and the supporting attachments in our email submission is within the 100 page limit given in the notice of the meeting. Section 1 of our comments concerns three proposals in the Proposals Book, two of which we submitted.

Section 2 of our comments is about a third, non-regulatory proposal we submitted and which is not in the Proposals Book or on the agenda for either the January 8 work session or the regulatory meeting. Nonetheless, we hope the board will consider it and we wish to introduce it into the public record via these comments.

Contents

- 1. Comments on published proposals for the January 9-13 regulatory meeting..... 2
 - A. Comments and Recommendation on Proposals 13 and 14..... 2
 - (i) The reason we submitted Proposal 13..... 2
 - (ii) ADF&G’s submission of Proposal 14..... 3
 - (iii) Comparison of Proposals 13 and 14..... 3
 - (iv) Why the existing regulation has caused mismanagement. 3
 - (v) Why Proposal 13 would correct problems with the current regulation. 3
 - (vi) Why Proposal 14 would not correct problems with the current regulation..... 4
 - (vi) RECOMMENDATION – Adopt Proposal 13 or an Amended Proposal 13. 5
 - RECOMMENDATION – Do not adopt Proposal 14..... 5
 - B. Comments and Recommendation on Proposal 26 5
 - (i) Why we submitted Proposal 26s 5
 - (ii) Summary of ADF&G’s opinion and recommendation on the proposal..... 6
 - (iii) Our rebuttal to ADF&G’s opinion and recommendation. 7
 - (iv) Our RECOMMENDATION on Proposal 26 7
- 2. Comments on our third, non-regulatory, proposal; and putting it in the record..... 7
 - A. Our proposal for a resolution by the Board on the State of Alaska’s “One-voice” policy..... 7



Attachments:..... 9

1. Press release for the 3/14/14 Unit 2 wolf emergency order. 9
2. Transcript, 2000 BoG deliberation on Region-1 deer objectives 9
3. Big Problem - Alaska’s 'One-Voice' resource development policy (Rev.1) 9

1. Comments on published proposals for the January 9-13 regulatory meeting

In addition to the comments below, we are including supporting information in *Attachments 1 and 2*.

A. Comments and Recommendation on Proposals 13 and 14

Proposals 13 and 14 regard the same topic, which is how to regulate the wolf season in Unit 2. Proposal 13 was submitted by Greenpeace, the Center for Biological Diversity, and The Boat Company. Proposal 14 was submitted by the Alaska Dept. of Fish & Game (ADF&G).

(i) The reason we submitted Proposal 13.

A March 13, 2014 ADF&G press release announced an emergency order closing the Unit 2 wolf season about two weeks early. (*Attachment 1*). From information in the press release it was obvious to us that in its management of the 2014 Unit 2 wolf season ADF&G took the phrase “annual harvest” in the pertinent regulation literally, instead of comprehensively considering all the mortality factors that drive the Unit’s wolf population. The regulation is 5 AAC 92.008(1).¹ That is, season management was based solely on assuring that the verified reported harvest, as enumerated by sealed skins, not exceed a guideline of 30% of the estimated wolf population, a level that is included in the regulation. Because the press release disclosed that the “seasonal harvest limit of 60 wolves ... is 30% of the estimated fall wolf population,” we noted that ADF&G based management of the season on an estimated population of 200 wolves in Unit 2.

This management was consistent with the regulation, but was inconsistent with two facts: (1) ADF&G had estimated that the Unit 2 population could be as low as 150 wolves; and (2) research by ADF&G has determined that the illegal (and therefore unreported) take of wolves in Unit 2 is a significant number. We submitted the proposal to modify the regulation because, with the Unit’s wolf numbers at a low level that is of publicly recognized concern, management should be based on the low end of the population estimate, and the regulation should clearly state that the department must take into account all causes of mortality, not just the number of sealed skins (i.e. “annual harvest” in the current regulation) and the few specific illegal takes (among many) that the area biologist may happen to become aware of. In the case of the March 2014 emergency closure, the illegal take of 1 wolf was known and taken into account; however, this is far lower than the scope of the illegal take of Unit 2 wolves that the department has noted through two radio collar studies. Both studies indicated (through the take of collared wolves) that the scope of illegal take has been approximately equal to the reported harvest (i.e. number of sealed skins).²

¹ The regulation reads: “wolves: the annual harvest of wolves in Unit 2 should not exceed 30 percent of the unit-wide, preseason population as estimated by the department.”

² The lead researcher, Dr. David Person, averred that the ratio of illegal to legal take may be somewhat lower than 50:50, since some wolves may have been taken illegally (shot and left or harvested but not



(ii) ADF&G's submission of Proposal 14.

It seems that ADF&G's submission of Proposal 14 arose in response to either our submission of Proposal 13 or issues Greenpeace raised with ADF&G personnel in Spring 2014 over the above problems with how the season was managed. To be clear though, we are not pointing a finger at ADF&G or its biologists with Proposal 13, but are simply looking for a correction to a regulation that can be – and actually has been – misleading.

(iii) Comparison of Proposals 13 and 14.

ADF&G opposes Proposal 13 and supports Proposal 14 (RC 2 at 20 & 21). We disagree with the department's assessment and recommendations for the following reasons. We recommend either the adoption of Proposal 13 or a modification of it as described below.

The existing regulation's over-simplified approach to managing the Unit 2 wolf season is a critical problem because the Unit's wolf population: (1) has been declining for a number of years; has declined to a low (though as yet undetermined) number; (2) is isolated and genetically distinct from other wolf populations in Southeast Alaska and North America; and (3) has for several decades been a matter of significant conservation concern to the department, other government agencies and the public. ADF&G's Proposal 14 does not squarely address the problems with the existing regulation, and would merely continue in somewhat modified form the current inflexible and incomprehensive regulatory approach, which will result in non-transparent management and may again sometime in the future lead to a management that is incompatible with wolf conservation.

Our observations are presented in the following subsections, and our recommendations are in the last one.

(iv) Why the existing regulation has caused mismanagement.

Regulation 5 AAC 92.008(1) has caused mismanagement because the term "annual harvest" and the quantity it represents is vague and subject to different interpretations. The department has interpreted the term to mean only the number of sealed skins, i.e. the reported harvest. To conserve a wolf population that is at a low number, all causes of mortality must be taken into account: natural mortality, reported harvest, unreported harvest, wolves shot-and-left, and wounding loss from legal pursuit. Necessarily, some of these quantities have to be estimates, but they all are important components of wolf conservation.

Accordingly, there are two problems with the existing regulation. If its intent with the phrase "annual harvest" is for all causes of human-caused mortality to be taken into account, that is unclear and is now demonstrated to be subject to misinterpretation even by professional wildlife managers. This needs to be corrected. Second, because the 30% guideline is firm and is stated without any context regarding the total mortality percentage (natural and human-caused) that is consistent with a sustainable population, the regulation engenders management by rote instead of being based on biological principles. In short, the regulation is over-simplified and has misled management.

(v) Why Proposal 13 would correct problems with the current regulation.

Proposal 13 would correct problems in the existing regulation regarding three factors:

submitted for sealing) because they had radio telemetry collars. Nonetheless, he still believed that the scope of the illegal take in the unit is quite high.



1. Natural mortality. The 30% guideline in both the existing regulation and in Proposal 13 is based on an allowance of up to 8% for natural mortality. However, the natural mortality factor is explicit in Proposal 13, but is not evident in the existing regulation even though it was obviously taken into account in crafting the regulation.³ The proposal is transparent in this regard; the regulation is not.

2. Human-caused mortality. Proposal 13 explicitly notes the types of human-caused mortality must be taken into account. The existing regulation ambiguously calls for basing management on “annual mortality,” which is an undefined term.

3. The population basis for management. The existing regulation does not contemplate that ADF&G’s estimate of the wolf population may be a range rather than a specific number. In fact, the department’s estimate for the 2014 season was 150 to 250 wolves, and the quota of 60 wolves for the season was based on the midpoint (200) of that range, as the number to which the regulation’s 30% guideline was applied.⁴

(vi) Why Proposal 14 would not correct problems with the current regulation.

Proposal 14 would correct only __ of the three problems with the existing regulation.

1. Natural mortality. Like the current regulation, Proposal 14 is non-transparent concerning natural mortality. The proposal changes the guideline from 30% to 20%, so that both natural mortality and to some degree illegal take are considered. But this makes the proposal even more opaque than the current regulation because the amount of natural mortality that the regulation assumes cannot be reverse-engineered.⁵ This confounds integrating regulatory management with biological management.

2. Human-caused mortality. In this regard there are two problems with Proposal 14. First, it retains the ambiguous term “annual harvest,” which was an apparent problem with mismanagement of the 2014 season. The term is not defined, and illegal take is not mentioned.

Second, the allowance in Proposal 14 for human-caused mortality (legal and illegal), implemented by changing the guideline from 30% to 20%, is completely arbitrary and non-transparent. If the biological breakpoint for sustainable mortality is 38% of the population and if “annual harvest” continues to be interpreted as the reported harvest (number of sealed skins), the proposed guideline implicitly allows for a combined natural plus illegal mortality of only 18%. With natural mortality being estimated by Unit 2 research to be 5-8%, this means the proposal’s implicit allowance for illegal take is only 10-13%. This is surely far less than the actual amount of illegal take that was evident from the two Unit 2 radio collar studies. But an equally fundamental problem is that Proposal 14 would hard-code this absolutely arbitrary allowance into the regulation. The amount of illegal take (as either absolute number or as a ratio to reported harvest) must be expected to change over time for various reasons, so hard-coding it in the regulation is contrary to wildlife conservation principles.

³ ADF&G research has estimated that 38% mortality is the approximate breakpoint for population decline, and that natural mortality is 5-8%.

⁴ This is obvious from ADF&G’s 3/14/14 press release: $0.30 * 200 = 60$ wolves. We also confirmed with the area biologist and WLC’s Region 1 Supervisor (Doug Larsen) that this is how quota was determined.

⁵ I.e., for the current regulation a 38% sustainable mortality minus 30% means 8% natural mortality, as is consistent with research data. (Or actually as the 2014 season was managed, the operative assumption that was made therefore was 8% for natural mortality plus illegal take.)



3. The population basis for management. As with the current regulation, in Proposal 14 the basis establishing the seasonal quota for reported harvest is the “preseason population as estimated by the department.” This ignores that fact that ADF&G’s estimate of the Unit 2 wolf population both from research and as used in management has been a range (e.g. 150 to 250 wolves for the 2014 season), not a solitary number. For the 2014 season, the midpoint of the range was arbitrarily used as the basis for calculating the quota. For the 2015 season, the recently announced quota is based on the low end of the range. (*Attachment 2*, ADF&G press release of March 13, 2014). Under Proposal 14, this conservatism may not always be applied in the future, even if the wolf population is low.

4. Proposal 14’s addition of a “restriction to bag limit.” The inclusion of the bag limit restriction does not overcome the substantial deficiencies in other respects of Proposal 14.

5. Conclusions regarding Proposal 14. The proposal would not correct any of the problems of the existing regulation. Although it would result in a lower annual quota for reported harvest, the proposal is contrary in several respects with the conservation of a wolf population that is at low numbers.

**(vi) RECOMMENDATION – Adopt Proposal 13 or an Amended Proposal 13.
RECOMMENDATION – Do not adopt Proposal 14.**

We recommend and request that Proposal 13 be adopted as submitted. It corrects the faults of the existing regulation, and avoids the problems and arbitrary management that the competing Proposal 14 would put in place.

An amendment to Proposal 13 the board may consider regards the proposal’s phrase “the Department’s minimum estimate of the unit-wide fall population,” as the basis for determining the seasonal quota. The phrase makes sense for the current low number of Unit 2 wolves; however, if the population becomes substantial again, using the mid-point as the basis may make sense. If that larger population were to begin to decline, the quota could be adjusted in subsequent years to attain sustainability. So, appropriate amendment language may be something like:

“... so that the total annual human take from all causes (reported, illegal and wounding loss) does not exceed 30% of the Department’s minimum estimate (if the number is low or declining) or a larger number from the estimate range (if the population is substantial) of the unit-wide fall population ...”

B. Comments and Recommendation on Proposal 26

(i) Why we submitted Proposal 26s

Our Proposal 26 is a request for the Board to revisit the deer population and harvest objectives that the Board set at its meeting in November 2000 for all GMUs in Southeast. The board may not be able to accomplish all that is needed at one meeting, so the proposal also recommends that the Board certain initial actions the board can easily take at its January meeting.

The Board is required by the intensive management law (AS 16.05.255(e)-(g)) to set population and harvest objectives for all ungulate populations in Alaska. The objectives for units in Southeast were the last ones set in the state, at the November 2000 meeting. We have obtained the pertinent official audio recording of that session, including relevant ADF&G’s testimony (its management reports and its testimony on 2000 Proposal 33), and we have transcribed them — see *Attachment 2*.



It is clear in the materials from the 2000 meeting that: (1) the Board was quite uncomfortable setting the objectives for Southeast; (2) it considered the objective-setting for Southeast to be a proforma exercise that is must by law accomplish; (3) members believed Southeast should be exempted from the objective-setting legal requirement; and (4) the objectives for Southeast should be revisited every one to two board cycles. Nonetheless, the board has not revisited the objectives since they were adopted 14 years ago, and circumstances have changed substantially since then.

The population and harvest objectives for Southeast are excessively high. The basis for ADF&G's recommendations at the time were based on populations and harvests that were at a peak. In addition, the department boosted the numbers in its recommendations by 5%, to be optimistic about future hunting potential. In deliberating these numbers, the board was concerned that ADF&G gave precise recommendations down to the last deer (e.g. a population objective of 14,781 deer for Unit 1A).⁶ The board recognized that the factors involved were "squishy," and decided that "round, very round numbers" should be used instead. In rounding the numbers, the board then revised *all* of ADF&G's recommendations *upward* to the next highest hundred, further exaggerating them. For all of these reasons, the objectives that were adopted were much higher than they should have been.

At the same time, habitat loss due to logging on the Tongass National Forest and on the region's non-federal lands (owned by the state, the university, the Alaska Mental Health Trust and the Native corporations) had by 2000 taken much of the best deer winter range throughout much of the region — and it continues to do so. Due to the way second-growth forests regenerate, the full loss of habitat capability does not occur until 25-40 years after the logging occurred. This is called "succession debt." Therefore, when the board set the objectives in 2000, the full impact had not yet become apparent from the logging that had occurred since 1975 and some cases as early as 1960. Although habitat loss was briefly mentioned at a few points in the board's discussion, it was not substantively considered and was not taken into account in the final setting of objective numbers. Nonetheless, it is now 14 years later now, much of the succession debt of 2000 has come due and more has been accumulated due to new logging,⁷ and deer numbers have declined in the heavily impacted areas of Southeast, particularly in times of severe winters.⁸

For all of these reasons, the deer population and harvest objectives for Game Management Units 1 through 5 are long, long past their expiration date, are excessively high, and are not consistent with sound management of the region's deer.

(ii) Summary of ADF&G's opinion and recommendation on the proposal

In its comments (RC-2 at 40-42), ADF&G has a neutral opinion on this proposal and notes its opinions that (1) deer populations are uncertain throughout Southeast, (2) quantitative data for these populations is lacking "for improving IM objectives;" and (3) further near-future work will "help improve future adjustments" to the population and harvest objectives. ADF&G also notes that it "does not have additional or new information to address revisions to the ... population objectives at this time," and recommends retaining the existing objectives for the time being, while additional work is done toward revision. (RC-2 at 42).

⁶ See transcript of the board deliberation, *Attachment 2* at 18.

⁷ The forest "succession debt" of today is from logging done since at least 1990 and in some cases as early as the mid-1970s, and it will continue to reduce the winter carrying capacity for deer, and will tend to push deer populations lower and lower.

⁸ Despite the fall of 2014 being quite warm, it is important that Southeast had record-setting snowfalls in 2006-2008. The climate is chaotic, and future severe winters must be anticipated.



(iii) Our rebuttal to ADF&G’s opinion and recommendation.

In its comments on Proposal 26 in RC-2, ADF&G has not squarely addressed to problems we raised when we submitted the proposal. In fact, the acknowledgements in the department’s comments that data is lacking or uncertain reinforces our contention that the population and harvest objectives that are currently in force have no justification.

We see no merit to ADF&G’s recommendation that the existing objectives be retained “at this time,” pending further work toward adjustments. While it is good that ADF&G intends to do this work, we believe there is credibility in continuing to rely on objectives that are known to be outdated and faulty. We urge the board *not* to cling to these objectives which bear no relationship to reality, even for an interim period.

(iv) Our RECOMMENDATION on Proposal 26

The first step the board should take – at its January meeting – is to recognize that the deer population and harvest objectives for Southeast are long, long out of date, were set too high in the first place, and were expected (by the board which set them) to be reviewed early and often.

The second step the board should take – also at its January meeting – is to pass a motion that invalidates all of the deer objectives for Southeast and requests ADF&G to prepare proposed recommendations on objectives for a future meeting. The request to ADF&G should include that the department recommend to the board whether it would be beneficial from a wildlife management perspective for the Intensive Management Act to be revised to exempt the board from setting population and harvest objectives for deer in Units 1-5.

2. Comments on our third, non-regulatory, proposal; and putting it in the record

A. Our proposal for a resolution by the Board on the State of Alaska’s “One-voice” policy.

Earlier this year we made a timely submission of the non-regulatory proposal quoted below, requesting that the board pass a resolution and send letters to the governor and legislature concerning the state’s “one-voice” policy on natural resource management. The policy is detrimental to the management and conservation of wildlife and wildlife habitat in statewide, and particularly in Southeast Alaska. From our submission form:

What is the issue you would like the board to address and why?

In 2004, under the administration of Governor Frank Murkowski, the commissioners of the resource agencies of the state (ADF&G, DNR and DEC) adopted a “one-voice” policy that banned separate opinions about resource issues from the three agencies – that is, henceforth the state would speak with one voice on resource issues. (Juneau Empire, 23 Sept. 2004). The directive was not always observed up through the Palin administration, but has been strictly observed under the Parnell administration. In early 2007 the Palin administration created “the State Tongass Team” (STT) – which still exists today. The STT was unknown outside of state government until very recently. It is administered by DNR, which appoints the chairman, and is composed of about 20 high-level state employees from ADF&G; DNR; DEC; DCCED; DOT/PF; Law; and the Governor’s office. It meets monthly or as needed.

The function of the STT has been to bury any issues, information or professional opinions from within any department of the state that may interfere with maximal logging on the Tongass National Forest. The STT exerts top-down pressure on the

resource agencies to, for example, write pallid comments on Tongass National Forest timber sale environmental impact statements, and filter-out any troublesome remarks that are sometimes nonetheless made in drafts of comments that reach the STT, before the STT submits the state's final comments. Through an MOU with the Forest Service the STT gets an advance draft (not provided to the public) of draft or final EISs the Forest Service is about to issue, and the STT has badgered the Forest Service to actually remove from an EIS verbal remarks that ADF&G biologists made to Forest Service counterparts or in official ADF&G comments made before STT process became strictly enforced.

Execution of the One-voice policy withholds from Forest Service decision makers, from the Alaskan public and from the Board of Game vital information that was obtained at public expense by the state's own experts, and which should be available to all and subject to public discussion and deliberation. Certainly the governor has a right to his opinion; however, the deliberate suppression of facts and particularly those facts which may expose the administration's political opinion as untenable – that act is unconscionable and in direct conflict with the high obligation of state government under Article VIII of the Alaska Constitution to provide for the common use and sustained yield of wildlife (and fish) resources.

Further, the actions of the STT (including but going beyond execution of the One-voice policy) interferes with the Board of Game's execution of its obligations under Article VIII by assuring that vital information does not enter the public realm and by directly or surreptitiously invoking the Forest Service to commit unjustified, irreparable damage to wildlife habitat – compounding problems being encountered in the state's management of wildlife. Prior Boards of Game have invoked their obligations under Article VIII is resolutions asking for restraint of logging on the Tongass National Forest. We believe it is now time for the Board to invoke those obligations in a new resolution asking both the Governor and the Legislature to terminate both the STT and the One-voice policy, and to eliminate all ADF&G policies that may be construed to limit the freedom of ADF&G biologists to express their professional opinions on habitat, wildlife or related matters on which they have expertise.

What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say? (Please provide draft regulatory language, if possible.)

We recommend that the Board of Game adopt and distribute to the governor, the legislature and the news media a resolution with “whereas” statements that express the above facts, problems and constitutional conflicts, concluding with these “resolved” statements:

Resolved, that the Board of Game requires the unfettered exchange of knowledge regarding wildlife issues, both in matters before the Board and for the common day-to-day discussion among the populace that may form opinions and comment or testify to the Board, in order that the Board can execute its duties under the Constitution and laws of the state; and

Resolved, that therefore the Alaska Board of Game requests the Governor to immediately disband the State Tongass Team (STT), terminate the One-voice policy, and issue a policy that ensures ADF&G biologists can freely – without any restriction – express their professional opinions on wildlife (and fish) matters for which they have expertise, without any pressure to do otherwise or any cause to fear reprisal; and



Resolved, that the Alaska Board of Game requests the Legislature to pass legislation that will prevent the executive branch from establishing policies or administrative mechanisms that have effects similar to the STT and the One-voice policy, and which will ensure the above professional rights for ADF&G biologists.

We are disappointed that the board has not included this proposal on either of the January agendas. We do though hope the board will put the matter on an agenda for one of its other 2015 meetings. We encourage the board to do so because this is a matter of high statewide importance. As supporting material we provide as *Attachment 3* a summary of information we have on how the *one-voice* policy has been employed under previous gubernatorial administrations, *Big Problem -- Alaska's 'One-Voice' resource development policy*.⁹

Sincerely,

(Verifiable signatures on request)

Larry Edwards
Greenpeace
Box 6484
Sitka, Alaska 99835
larry.edwards@greenpeace.org

Rebecca Noblin
Center for Biological Diversity
Box 100599
Anchorage, Alaska 99510
rnoblin@biologicaldiversity.org

Joel Hanson, Conservation Prog. Director
The Boat Company
417 Arrowhead Street
Sitka, AK 99835
joelh@theboatcompany.com

Attachments:

- 1. Press release for the 3/14/14 Unit 2 wolf emergency order.** *
- 2. Transcript, 2000 BoG deliberation on Region-1 deer objectives** *
- 3. Big Problem - Alaska's 'One-Voice' resource development policy (Rev.1)** *

*Please see PC006 in the 2015 Southeast Region Meeting Comments for this document

⁹ Revision 1, dated November 2014. By Larry Edwards of Greenpeace.



From: [Larry Edwards](#)
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Cc: [Gabriel Scott](#)
Subject: Additional signer to Greenpeace et al BoG comments
Date: Friday, December 26, 2014 3:56:14 PM

Please note the Cascadia Wildlands wishes to also sign the joint comments to the Board of Game that I submitted a few minutes ago. The signing information is:

Gabriel Scott
Cascadia Wildlands
Box 853
Cordova, Ak 99574
gscott@caswild.org

-- Larry

Larry Edwards
907-747-7557
Sitka Field Office
Greenpeace

===== Forwarded =====

Date: Friday, December 26, 2014 (3:49 PM)
From: Gabriel Scott <gscott@caswild.org>
To: Larry Edwards <ledwards@greenpeace.org>
Subj: ACT: Draft comment to Board of Game (Due today)

These are great. If it's helpful please sign Cascadia on.

-gabe



Advocating for Denali's Wilderness, Wildlife and Way of life.



December 26, 2014

PO Box 78,
Denali Park AK 99755
www.denalicitizens.org
907-683-3396

Alaska Board of Game
PO Box 115526
Juneau, Alaska 99811

RE: Work Session, January 2015

Dear Members,

Representing the board and members of the Denali Citizens Council (<http://www.denalicitizens.org>), I am submitting these comments for your January 2015 Work Session. We have comments in three areas, listed below.

1. Be reluctant to move to a three year cycle for BoG meetings

a. This decision has not been adequately analyzed, financially.

Having read the materials on your website and considered the options, the DCC remains uncertain that this move is workable or the best way to cut costs. We acknowledge that cutting costs is even more important now, given recent declines in the price of oil. However, the materials on your website were not sufficiently detailed to provide a conclusive case for using the Board of Game cycle as an area for cuts. There are three areas of concern here;

i. The portion of the total budget of the ADF&G allocated to Board of Game meetings was not specified. Is this an unwieldy or excessively large portion of the total budget? A glance at the operating budget for Fish and Game does not clarify this situation. If one adds "Administrative Services," and "Boards and Advisory Committees" components, the total is around \$15 million. One would also expect the Board of Game meeting cycle might involve some portion of the "Wildlife Conservation" cost component. The portion of that cost is not specified. The total budget for the Alaska Department of Fish and Game is \$217 million dollars. Is the portion allotted to Board of Game meetings too large? The public really does not have sufficient information to provide adequate input.

ii. The Department, in its information on making the cycle change, has not provided any other financial scenarios to compare with it. The Budget for the Department of Wildlife Conservation is almost \$47 million,

*Board of
Directors*

David Arnold

Nancy Bale

Sarah Bartholow

Nan Eagleson

Brian Napier

Michael Raffaeli

Hannah Ragland

Erica Watson



roughly a quarter of the total. Can this budget be cut in ways not related to Board of Game meetings?

- iii. Given the inadequate information on which to base a reasoned public comment, the Denali Citizens Council advocates rejecting this change at this time.

b. This decision has troubling “public process” implications.

We at DCC value the Board of Game process, although we wish the board reflected a more diverse cross section of Alaska citizen interests. There is no indication at present whether lengthening the cycle will lessen the total workload of the BoG or result in better responsiveness to Advisory Committee concerns. To the contrary, problems will occur and require attention and action. With less frequent full meetings, action is likely to be taken on an emergency basis and without due public process.

DCC has come before the Board of Game to advocate for enhanced conservation of wolves who den in Denali National Park and venture into state lands in Unit 20C. It is clear from limited state and more comprehensive National Park Service data that wolf numbers in 20C are low. This situation has caused DCC and others to bring proposals before the BoG on “buffer zone” concepts. Already, such proposals have been banned from discussion by the Board of Game until the Interior 2016 cycle. We’re concerned that a change in cycle length could require that we wait until 2017 to bring a proposal before the Board of Game. Furthermore, the proposed cycle length change does not inspire optimism that our concerns will be addressed.

2. Re-examine the management of Alaska’s resources under the IM law

The Intensive Management law may require the Department and Board to support consumptive use opportunities, but the application of this law in recent decisions of the Board of Game has not held up the spirit of the law. The purpose of the law was to provide Alaskans the opportunity to feed their families with Alaska’s wild resources, under a scientifically sustainable system. At this point, 20 years after its passage, the IM law is being invoked as an excuse to include all manner of programs, methods and means, and unscientifically examined or proved practices in the name of hunter opportunity (and not all hunters are Alaskans). We are especially concerned when the Board is approached, in the name of hunter opportunity, to do the following;

- a. Weaken regulations requiring the salvage of meat
- b. Lengthen the season on furbearing animals to those times of the year when pelts have little or no value.
- c. Allow questionably ethical activities to occur in the pursuit of game, excusing them because somehow they were “traditional” in Alaska, and that they enhance “opportunity.”



- d. Allow hunting/trapping activities that do not result in the “take” of useful products, such as meat or fur, but simply provide the opportunity to hunt or trap. Trapping regulations that do not require frequent visits to traplines, resulting in a greater likelihood of spoiled pelts, are but one example. These are state resources being trapped, and their care should be a priority for the state.
- e. The above activities are not part of what was intended by the IM Law, in the opinion of DCC.

The Board of Game’s serves Alaskan citizens, all of us, and we’re concerned that the Department and Board are, instead, following the “hunter opportunity” mantra into a dangerous and unethical regulatory minefield. It may be time to re-examine the Department’s policies and duties around the IM law. The department could save money through examining just how much state money is spent on providing “opportunity” versus actual tangible benefit to individual Alaskans. Is the micro-management being done under the IM law costing the state of Alaska too much money?

3. Be willing to co-operate with the Federal Government land managers in the state of Alaska. Discourage use of damaging rhetoric, like the term “federal overreach.”

There are a number of issues and problems that cross boundaries between federally managed units and state lands. The Denali wolf issue, mentioned above, is just one. Greater willingness to find a solution that satisfies a wide cross section of Alaskans would be welcome.

A recent federal regulation, promulgated to control the use of certain methods and means for take of predators on National Preserves, is sensible and worthy of state support, not the opposition we have heard. By no means would the dropping of these practices affect the actual harvest of meat resources in Alaska. We are hoping that the Department and the BoG will make a strong effort to cooperate with federal managers to reach a viable solution without name calling.

Thank you for the opportunity to provide comments for your Work Session in January. We hope you have time to consider these points as you deliberate.

Sincerely,
/s/ Nancy Bale
DCC Board of Directors



The following comments were submitted via the Online Comment Form to the Board of Game's
2015 Work Session.

brandi mast
Submitted On
12/22/2014 8:02:31 AM
Affiliation
Phone
2177780687
Email
brizzandi30@hotmail.com Address
1209 s center
Mahomet, Illinois 61853

I stand for and support the protection for all wolves.

Doreen Andreola
Submitted On
12/24/2014 6:30:06 PM
Affiliation
Phone
908 494 5332
Email
dorcar01@yahoo.com Address
445 N. Stiles St.
Linden, New Jersey 07036

Protect all animals.....

elizabeth
Submitted On
12/23/2014 10:27:56 PM
Affiliation
Phone
843 655 0574
Email
lizatocean@yahoo.com Address
po box 834
north myrtle besch, South Carolina 29597

please do not kill more beings of god.they deserve to live....Why be killers. Show mercy for the wolves....

Linda Seglem
Submitted On
12/25/2014 6:43:35 PM
Affiliation
Phone
580-562-3236
Email
lseglem@windstream.net
Address
104 Osage
PO Box 695
Burns Flat, Oklahoma 73624

Wolves are vital not only to our environment but to our ecosystem! When they were reintroduced to Yelow Stone it improved the river banks, more vegetation grew! More food for the larger predators like bears! More birds and waterfowl came! It changed the whole



Submitted By

landscape for the better! Alaska is our last frontier and only state now that has Grizzlies! We have so many wonderful animals that will soon become extinct because we are running them out of their habitat! And now we are doing the same in Alaska! Before long the last of the wild places in the US will be gone and we cant get it back! When we kill our predators off we will be in trouble and that is exactly what we are doing! We will be sorry, I promise you that!

Lis

Submitted On

12/21/2014 2:11:12 PM

Affiliation

Phone

Sette

Email

Belissette@excite.com

Address

4520 N Damen
Chicago, Illinois 60625

Dear legislators,

Please do all you can to protect wildlife against sport hunting and trapping. All animals deserve to leave in peace especially because they were the first settlers of this land. Save and protect wildlife !

Marie

Submitted On

12/23/2014 6:45:37 AM

Affiliation

Phone

720-690-4954

Email

marietally@gmail.com Address

244 Pheasant Run
Louisville, Colorado 80027

Please protect these beautiful creatures. They are essential to our ecosystem and they deserve to live in peace so our future generation's can love and enjoy them as well. Thank You for your time.

miriam fennell

Submitted On

12/23/2014 12:05:42 PM

Affiliation

Phone

419-861-3937

Email

mtmp7@buckeye-access.com

Address

7049 kipling dr.
holand, Ohio 43528

the land and the animals are just as important as our families are to us. we depend on stores for our needs. we expect our families to be by us at all times. these animals are no different. they too are a family, yet they fend off the land as God meant it to be. if we don't stop destroying there land and food supply, they will always be in our backyards. what does it take to make man understand to let nature takes it's natural course as it has been since the beginning of time? everything worked and was fine till man stepped and decided to change the planet and all on it. this has become a sad world for man and beast of all kinds. God must be very sad to see what we have runied, that He created in beauty for us. it's a sad world indeed!



Sharon Arger
Submitted On
12/24/2014 5:21:11 AM
Affiliation
Arger Capital

Phone
509*536*6378
Email
sharonarger@comcast.net
Address
10510 W. Richland Rd. #61
Spokane, Washington 99004

I am not suprised to find out our illuostrios state of Alaska is once again including wolves in their predator lissting. While most stated recognize the inherrent value of the balance in nature, you continue to defy all logic and reasoning. The wolves are being considered endagered in other states.

Perhaps there woulnt be so many "STARVING DEER,ETC. IF WE LET NATURE HAVE PREDATORS....HUMANS ARE PREDATORS -- JUST LOOK AT OUR CANINE TEETH(DOG).CANINE ALSO REFERS TO OUR BEST FRIEND, A WOLF DESCENDENT - THE DOG!
Please put all wolves back on the endangered species act...WHERE they belong,

vanessa
Submitted On
12/21/2014 9:10:01 PM
Affiliation

Yes, provide protection for the wolves.

wendy helberg
Submitted On
12/23/2014 3:43:06 PM
Affiliation
Phone
951-296-7820
Email
wendyhelberg@gmail.com
Address
30995 via norte
temecula, California 92591

I am writing to you in order to voice my feelings about protecting wolves; they are a vital element to the balance and harmony of nature; evidence is overwhelming in Yellowstone...please do your research there...its amazing! Their reintroduction into the park in 1995 has done nothing but brought improvements to the nature order of things, from saving the grizzly bear from extinction, to increasing the pronghorn population, increase in wildflowers and trees and grasses by streams that were thought extinct regrew, the buffalo and elk herd healthier as well. Do the right thing and protect these magnificent animals!