

From: [Dan Dunaway](#)
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: comment for 3-17 BOG workshop
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March 16, 2016

Alaska Board of Game

Regarding the USFWS proposal rules: "Non-Subsistence Take, Public Participation and Closure on Alaskan Wildlife Refuges."

I see you are reviewing this item during your March 17 workshop.

I am offering some comments for you to consider during this meeting.

I'm a life long resident of Alaska starting in Anchorage. I've lived in Dillingham for the last 27 years. I lived in the Alaska Peninsula and Eastern Aleutians from 1978 to 1989. I hunt and fish under subsistence and sport regulations. I'm a federally qualified user of the Togiak National Wildlife Refuge.

I'm a member of the Nushagak AC and Bristol Bay RAC but these comments are strictly my personal views.

I am opposed to parts of the Fish & Wildlife Service propose rule and I have submitted some comments to the Service. I hope you will submit comments to them as well.

Public Advisement: First the stuff I support: I support FWS using all means available to keep the public informed on their various activities. BUT given the poor or nonexistent internet coverage of much of Alaska, I oppose the Service relying solely on internet or cell connections. Many bush residents still don't use internet or are not proficient.

Closure procedures: I understand the Service's desire to cut down their burden for routine annual closures but I think public oversight and notification is more important. I hope a balance can be found but I do not want to see "Temporary Closures" morph into perpetual closures with little or no opportunities for public review and comment.

Hunting Methods: This is my greatest concern. I think it is misleading to say this action will not have impacts on the subsistence users There is potential for significant negative impacts to subsistence users. I do not see how the Service can "not manage" for harvestable surpluses for the general public without harming subsistence harvests as well. And the general public deserve hunting opportunities beyond a faint hope.

I object to the Service using the justification of "particularly effective methods". If this excuse becomes institutionalized I fear they will later trot it out to add further restrictions. This seems like some individuals within the Service are seeking to impose their personal ethics on

the greater using public and I find that repugnant.

I fear the elimination of these means as well as the near total refusal to use actual predator control could result in very long term "stable but extremely low levels of game"; this harms subsistence and non-subsistence users across the board. Yes "diversity" may be maintained but with no regard for human uses, some groups who have been depending on the resources for millenia. Take the Alaska Peninsula caribou herds for instance where human harvest has been closed for something like 15 years. My friends in those areas are extremely frustrated to have to wait so long for hunting opportunities. Moose numbers on the Peninsula have been at low levels for a long time too - though predators aren't the whole picture there.

I object to FWS codification and clarification that: "predator control is not allowed on refuges in Alaska unless it is determined to be necessary to meet refuge purposes,....." From their actions to date, the Service policy appears to be they ONLY use predator control when it is certain predators will extirpate a prey species - WITH NO REGARD FOR HUMAN NEEDS. Think Unimak Is. caribou where a single refuge manager was allowed to totally block a scientifically justified, authorized, and planned predator reduction effort. I think the Service is taking a far too extreme interpretation of their legislative directives. The Service needs to include human use in their interpretation of maintaining diversity.

Most Alaskan Refuges were established to provide subsistence harvest opportunity (remember "Refuge Purposes?"). How then does the Service propose to rectify this new proposed rule with original ANILCA language and formation of these refuges? [Title VIII of AILCA says that a purpose of all Alaska refuges (except Kenai) is subsistence.] Refusal to implement predator reduction to preserve opportunities for human harvestable game populations is a dereliction of duties. I'm not expecting them to run refuges like a game farm but they must show more respect for human harvestable populations.

In the absence of actual predator control programs, I believe the methods the proposed rule seeks to ban should remain available options that could amount to low level public use and reduction of predators. These activities could still be regulated refuge to refuge depending on public interest and predator population levels. Do not remove them as tools to be used. As far as being "particularly effective" - darned straight - that is the whole point, at times we need to be particularly effective. I am in no way advocating for excessive use of these tools or extermination of any predator species.

Thank you for your consideration of my comments.

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