

ALASKA BOARD OF GAME  
Interior Region  
February 26-March 7, 2010

**Public Comment Index**

1. Alaska Backcountry Hunters & Anglers
2. Christine Byl
3. Minto Village
4. Sierra Club
5. Kerry MacLachlan
6. Barbara Brease
7. Matt Farling
8. Donnie Hagen
9. Anja Phenix
10. Vic Van Ballenberghe
11. Alaska Trappers Association
12. Andrew Gach
13. Austin Brisco
14. Janet L. Rhodes
15. Ashley Relph
16. Lee Purcell
17. Eric Erikson
18. Vern Fiehler
19. David Pott
20. Jenny Pursell
21. Don Ilqenfritz
22. Betty and Tom Quattrochi
23. John Toppenburg
24. Wayne Hall
25. Alaska Wildlife Alliance
26. Susan Super
27. Andra Silgailis
28. Sharon Lowe
29. Lydia Garvey
30. National Parks Conservation Association
31. Janice Kasper
32. Amy Holonics
33. Pat Huseby
34. Nancy Wallace
35. Michael Banks
36. Tad Fujioka
37. Holy Cross Tribal Council
38. David Lester
39. Alaska Outdoor Council
40. Kwethluk IRA Council
41. Susan Brown
42. Denali Citizens Council
43. National Parks Conservation Association
44. Steve Pankhurst
45. Alaska Professional Hunters Association
46. William Brown
47. Ahtna Inc.
48. Alaska Center for the Environment, Alaska Wildlife Alliance, and Defenders of Wildlife
49. Nancy Sydnam
50. Gary Halmstad
51. Dr. Michael and Dr. Joyce Huesemann
52. U.S.F.W.S.
53. Tom and Jane Meacham
54. John Giuchici
55. NJ Gates
56. Dr. I de Baintner MD FACSM (Major USAF, retired)
57. Dr. Dorie Klein
58. Nan Eagleson
59. Michael R. Dullen
60. Luke and Alice Demientieff
61. Kathleen Toubman
62. Debra Waugaman Curnow
63. Kathleen Wagner
64. Linda Wagner
65. Anne Beaulaurier
66. Tom Lamal
67. Troy Dunn
68. Dave Morris
69. Richard and Sharon Swisher
70. Henry D. Tiffany IV
71. National Parks Service
72. Lynn Ledgewood
73. Kneeland Taylor

74. Dave Bachrach
75. Joan Beldin
76. Thomas Klein
77. Marybeth Holleman
78. Rich Steiner
79. Alaska Wild Sheep Foundation
80. Richard Fuelling
81. Marilyn Houser
82. Mark Balitzer
83. Svetlana Ostrovskaaya, Yakov,  
Deanna, and Marsha Sverdlov
84. Johnny Johnson
85. Matthew Kerby
86. Alaska Center for the  
Environment
87. U.S.F.W.S. and NPS
88. Jeff Sloss
89. Katherine Hoak
90. Jennifer Thiermann
91. Ide Baintner
92. John Vrabel
93. Gretchen Shaw
94. Linda Donegan
95. Jan St. Peters
96. George and Priscilla Herben
97. William Lange and Nichole Fliss
98. Kenneth and Cherie Mason
99. Long Gilbert
100. Kim Smith
101. William Taylor
102. Carol Clemens
103. Mary Helen Stephens
104. Janice Kasper
105. Connie Brandel
106. Art Greenwalt
107. Jane Heltebrake
108. RH Torborg
109. Dorothy McCorkle
110. Robert Watson
111. Bonna McCall
112. Mrs. Geri Tillett
113. Dani Button
114. Megan Klune
115. Dolphine Subosits
116. Didler Lindsey
117. Reta Hanks
118. Carolyn Rhodes
119. Louis Rhodes
120. Eileen Bosch
121. Hugh Rose and 71 Signatories
122. Mary Anderson
123. David Braun



# BACKCOUNTRY HUNTERS AND ANGLERS ALASKA CHAPTER



AK BHA

[www.alaskabackcountryhunters.org](http://www.alaskabackcountryhunters.org)

February 11, 2010

## Comments to the Alaska Board of Game Spring 2010 Interior Region III Meeting

[Proposals we **support**: 13, 16, 18, 19, 23, 74, 84]

[Proposals we **oppose**: 3, 14, 20, 69, 70, 75, 76, 97, 98, 106]

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**Proposal 3** – 5AAC 92.095 Unlawful methods of taking furbearers; exceptions

### **OPPOSE**

Alaska winter weather conditions and extreme temperatures, varying length of traplines, and other factors combine to make it unrealistic and implausible for trappers to check their traps every three days.

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**Proposal 13** – 5AAC 85.025 Hunting seasons and bag limits for caribou

### **SUPPORT**

This is a proposal from AK BHA – see our proposal statement.

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**Proposal 14** – 5AAC 85.025 Hunting seasons and bag limits for caribou

### **OPPOSE**

AK BHA wants to see youth and family hunting opportunities for Fortymile caribou continue in the roaded zones, with an August 10th hunt start date that begins before the school year. We oppose moving the hunt start date to the end of August for this reason, and because of concerns wildlife enforcement personnel won't be able to provide the needed presence if the caribou hunt happens at the same time as other moose hunts that begin in September.

We also want to see the Board address the many problems and conflicts caused by unrestricted motorized access off the Taylor Highway. This proposal does not address that ongoing issue.

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**Proposal 16** – 5AAC 85.055 Hunting seasons and bag limits for Dall sheep

**SUPPORT**

A similar proposal has been introduced before, and as stated was initially passed by the Board but then later rejected.

The “why” as to why it was rejected seems to center around the enormous clout and influence of the guide industry in Alaska, that at times puts non-resident hunter interests ahead of Alaskan resident hunter interests.

Please consider this comment from the executive director of the Alaska Professional Hunters Association, that claims to be “the voice” of the guide industry in Alaska: *“Currently, overcrowding of guides on State lands combined with decreasing wildlife populations is stimulating social disorder between hunter user groups and biological harm to our wildlife which leads to establishment of the restrictive drawing permit hunts.”*<sup>1</sup>

We see no valid reason, considering the known problems we currently have with overcrowding of guides on state lands, and the conflicts that is causing between guides/guided hunters and resident hunters, that the Board would continue to oppose giving resident sheep hunters a reasonable preference to get into the field first.

Resident sheep hunters typically don’t have the same high success rates as guided hunters. So the notion that an earlier resident-only sheep season is going to diminish the resource to where guided hunters aren’t as successful doesn’t really add up. And if it were true, that resident hunters would take enough sheep during the earlier season to actually drop non-resident hunter success rates dramatically...then perhaps that speaks more to capping all non-resident sheep hunting opportunities to a certain level, as so many other states do, **in order to provide a clear resident hunting preference.**

We want to make it clear that we fully support non-resident hunting opportunities in Alaska, and want to see those opportunities continue. We also fully support the guiding occupation and have an enormous amount of respect for the work and services that guides provide. We are also cognizant of the wildlife management funding that non-resident hunter licenses and tags provides.

But non-resident hunting opportunities and guiding opportunities should not come at such a great cost to resident hunting opportunities and a quality hunt experience.

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<sup>1</sup> December 2008 Letter to Governor Palin’s office

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**Proposal 18** – 5AAC 85.025 Hunting seasons and bag limits for caribou

**SUPPORT**

It is likely that 2010 Chisana caribou herd population estimates will show there are enough caribou for a limited, joint federal/state draw permit hunt, in accordance with the draft Chisana Caribou Herd Management Plan, that would begin in 2011.

We fully support this proposal to provide hunting opportunities for the increasing Chisana herd, and commend the Upper Yukon/Tanana Advisory Committee for their work on this issue.

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**Proposal 19** – 5AAC 85.025 Hunting seasons and bag limits for caribou; and 5AAC 92.036 Permit for taking a child hunting

**SUPPORT**

We support the intent of this proposal that asks for continued youth/family hunting opportunities of the Fortymile caribou herd in Zone 3 before the school year begins. Please see our AK BHA submitted Proposal 14 issue statement for more information.

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**Proposal 20** – 5AAC 85.025 Hunting seasons and bag limits for caribou

**OPPOSE**

The Fortymile caribou herd cannot sustain the increased harvest levels that this proposal asks for.

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**Proposal 21** – 5AAC 85.025 Hunting seasons and bag limits for caribou; and 92.052 Discretionary permit hunt conditions and procedures

**TAKE NO ACTION**

We wanted to comment on this proposal because it speaks to the growing problems and conflicts associated with unlimited registration permits and unrestricted motorized access that occurs with the popular Fortymile caribou hunt in the roaded zones.

Please see AK BHA Proposal 14 issue statement for more information.

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**Proposal 23** – 5AAC 85.055 Hunting seasons and bag limits for Dall sheep

## **SUPPORT**

The Tok Management Area objectives for a certain percentage harvest of trophy Dall rams is not being met. And it's likely this trophy harvest percentage will continue to decrease if we continue to allocate the same number of draw permits.

The only solution right now, unfortunately, is to decrease the number of available permits as per this proposal, either through Board action or ADFG discretionary permit authority.

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### **Proposal 68** – 5AAC 92.540 Controlled Use Areas

## **TAKE NO ACTION**

This proposal highlights the real and significant and continuing abuses with motorized access used for hunting. The Board should take note that these type of proposals are coming more and more from Advisory Committees and long-time Alaskan hunters that comprise those who themselves use ATVs for hunting; they just think that motorized access for hunting is getting out of hand. We agree; it is getting out of hand, and at some point it invariably reaches a tipping point that ends up creating more CUAs.

We would rather see reasonable motorized access restrictions, such as confining riders to designated trails only, than another CUA that bans this type of access. If we don't work toward these reasonable restrictions, we all lose out in the end.

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### **Proposal 69** – 5AAC 85.045 Hunting seasons and bag limits for moose; and 5AAC 92.540 (f) Controlled Use Areas

## **OPPOSE**

We strongly oppose opening the Wood River Controlled Use area to any motorized land access for hunting during this time period. Please see Proposal 70 comments.

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### **Proposal 70** – 5AAC 92.540 (f) Controlled Use Areas

## **OPPOSE**

AK BHA continues to oppose opening up the Wood River Controlled Use Area (WRCUA) to motorized land access during the restricted access period.

This proposal is similar to others that are continually before the Board each cycle. Of note is that the Board passed a proposal to allow motorized access in the WRCUA a

decade ago, but during the next cycle the same Advisory Committee that had asked for motorized land access two years prior, asked to have that access banned, and the Board agreed.

This proposal states that only those who win a special motorized-access permit would be allowed to use an ATV for access in the WRCUA. It's likely then that the vast majority of permit winners would be doing a solo hunt via ATV.

The basic rationale behind this proposal is that any on-foot hunting *without* the use of an ATV in the WRCUA requires a "young strapping prime human specimen." We completely disagree with such a premise.

This proposal further alludes that the allowance of motorized land access in the WRCUA for a single permit winner would provide more opportunity for someone with a physical disability, who can't walk very far, or with a heavy pack.

The truth is that few hunters hunt moose alone, and for good reason. Moose are large animals, and the skinning and butchering and hauling process is hard work for one person, even if that hauling is done via ATV. The last thing we want to see is someone with a physical disability trying to pull off a solo moose hunt via ATV in terrain that is known for difficulty in motorized access to begin with. What if this solo hunter can't drive right up to a downed moose? What if he or she gets stuck hauling the meat out?

If this proposal were to pass, how would Alaska Wildlife Troopers differentiate between any motorized users who have a permit, and those who don't? What enforcement problems and costs would occur?

We continue to oppose opening up the WRCUA to motorized land access.

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**Proposal 74** – 5AAC 85.010 Hunting seasons and bag limits for bison

**SUPPORT**

We support the authority of ADFG to issue discretionary hunt permits for Delta bison during any time period in order to help control any conflicts between bison and private land owners, and to meet the population and harvest objectives.

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**Proposal 75** – 5AAC 92.085 Unlawful methods of taking big game; exceptions

**OPPOSE**

We strongly oppose same-day-airborne hunting of Delta bison. If there are concerns in achieving the population and harvest objectives of the Delta bison herd, there are other

means and methods – see our support of proposal 74 – of achieving those objectives other than the legalization of same-day-airborne hunting.

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**Proposal 76** – 5AAC Unlawful methods of taking big game; exceptions

**OPPOSE**

We strongly oppose the legalization of radio and phone communications for the purpose of spotting animals and directing hunters to those animals. As per our comments on Proposal 75, if there are concerns in achieving population and harvest objectives, there are other means and methods of doing so that don't give the perception that hunters don't abide by "fair chase" principles.

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**Proposal 84** – 5AAC 92.125 Predation Control Areas Implementation Plans

**SUPPORT**

AK BHA supports the intent of this "proactive" proposal to ensure that the subsistence needs of local rural Alaskan hunters in the lower-Yukon area are met, in the face of declining salmon runs and fishing closures that are affecting those same residents.

We greatly appreciate the enormous amount of work that led to this proposal coming to fruition, by the GASH Advisory Committee and the Yukon-Innoko Moose Management Working Group and ADFG staff, and joint cooperation with the Federal Subsistence Board that led to the subsequent endorsement of the Yukon-Innoko Moose Management Plan.

We do, however, have some concerns about this Predator Control Implementation Plan that we'd like to address:

This plan requires accurate moose density estimates to be conducted in order to know if the moose population has declined to the level at which wolf control activities would begin. Those aerial density estimates are dependent on certain snow and weather conditions to ensure a high level of scientific accuracy.

We would expect any future aerial density estimates conducted by ADFG that may trigger wolf control to have a confidence interval of at least 90%.

Furthermore, both the aerial density estimates and any future aerial wolf control is extremely expensive, and we continue to be concerned about just how the Division of Wildlife Conservation will fund this Plan and other projects. In that respect, AK BHA continues to push for an increase in hunting license and tag fees to adequately fund the Division of Wildlife Conservation, but to no avail.

We ask the Board (again) to help us however they can to promote the fact that our Division of Wildlife Conservation is extremely underfunded, that the primary revenues come from hunting license and tag fees, and to help achieve the funding the Division of Wildlife Conservation needs.

It's time for all hunters **and hunting organizations** that support these kind of predator control implementation plans to understand that they aren't cheap, and that hunters aren't really paying, via license and tag fees, our fair share of wildlife management activities. It's also important for hunters to understand that these type of predator control implementation plans do indeed take away from funding many other necessary wildlife surveys and research that could provide more hunting opportunities for us all in other areas of the state.

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**Proposal 97** – 5AAC 92.085 Unlawful methods of taking big game; exceptions

**OPPOSE**

This is a similar proposal to one from the Fort Yukon Advisory Committee that we opposed in 2008 and the Board rejected.

AK BHA has been consistent in our opposition to the snaring of black bears in Alaska where grizzly bears are also present. It is impossible to completely avoid non-target catches of grizzly bears when snaring black bears.

Currently, snaring of black bears is only legal in certain bear-control areas, and while we strongly disagree with this allowance of black bear snaring in predator control areas, it should be noted that where that does occur a trapper must check snares at least every 24 hours. This proposal makes no mention of how often snares would be checked, nor what kind of snares or cable size would be used.

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**Proposal 98** – 5AAC 92.260 Taking cub bears and female bears with cubs prohibited

**OPPOSE**

The only areas where the taking of cubs, and sows with cubs, has been allowed are in intensive management areas where a bear-control program is in place. This unit has no such program in place.

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**Proposal 106** – 5AAC 92.220 Salvage of game meat, furs, and hides

## OPPOSE

There definitely are some moose meat spoilage issues in Unit 25, but mandating a Unit-wide meat-on-bone requirement isn't the solution, because it would adversely impact hunters who transport boned-out meat by aircraft or powerboat, and have no real need to keep the meat on the bone because of meat-spoilage concerns.

Most of any meat spoilage that occurs in Unit 25 seems to come from float-hunters who are unaware of the long time-frame between taking a moose in the upper reaches of a creek or river and reaching their take-out destination. When rivers are low, there is also a lot of dragging of rafts, and so those hunters also tend to bone out their moose in order to lighten their loads, which can lead to more spoilage than if it were kept on the bone.

Education is the key in preventing meat spoilage.

Air-taxi transporters who operate in Unit 25 should also be held to higher standards in truthfully informing float-hunt clients just what they are getting into during low-water conditions, and how long it will really take to float out, and that a meat pick-up may be needed at extra cost.

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Thank you to the Board of Game for your service to all Alaskans, and for the opportunity to comment.

Sincerely,  
Mark Richards, Co-chair AK BHA  
Dave Lyon, Co-chair AK BHA  
alaskabha@starband.net

January 31, 2010

To the State Board of Fish and Game:

As a year-round resident of Denali Borough and a landowner in Stampede Road/Panguingue Creek Subdivision, I would like to express my support for **Proposal: 72, Log #I-10S-G-018**, regarding trapping restrictions in the Healy/Stampede area.

I have attended several community meetings over the past few winters, in Healy, McKinley Village, and Cantwell, which have been informative and fruitful, but fell short of their intention: to come up with concrete solutions for the user conflict around trapping that continues to inflame the Borough. By filing this proposal, residents in support of trapping restrictions hope to arrive at a solution that will increase public safety, support positive public perception of trapping, and reduce injury and trauma to residents and their pets.

I am a dog-owner who skis, ski-jors, or mushes on the Stampede/Eight-Mile Lake trails nearly every day of the winter. In the summer, I pick berries, bike, hike and walk dogs in the Stampede Corridor. I also hike up Bison Gulch several times a month. Though I have not experienced a dog caught in a trap myself, I know four people in the Denali Borough who have. Although I am somewhat familiar with traps and how to release them, the threat of unknown and unmarked traps makes me feel less free to recreate the way I'd like to in my own backyard.

Let me state that I am not opposed to trapping. I have friends who have trapped in the area for years, and I understand the historic precedent that SF&G supports in regard to trapping in the Denali Borough. That said, skiing, travel with dogs, berry picking, and recreating with children are all equally historic pursuits, many of which even precede trapping in human settlements. As the laws stand right now, non-trappers must cede all their rights to trappers. Trappers may trap on any public land, without marking traps, and with no enforcement for trap-checking, seasonality, or other factors. Hikers, skiers, and other users must always assume that a trapper is using an area, because the possible harm is so great.

This proposal asks only for some recreational buffer areas in which pursuits other than trapping are considered primary. It does not seek to erode trappers' rights or inflict undue penalties. It does not seek to change the state's stance toward trapping as a historic pursuit. Indeed, at several community meetings, many trappers have indicated their support for some proposal of this type, which would minimize user conflict and help improve the public perception of their sport/industry. In addition, it would protect local trappers who know the area and the trails well from being encroached on and given a bad name by highway trappers who are coming north from Southcentral and trapping in an unethical fashion.

I urge the board to seriously consider this proposal. Denali Borough should be a place where many people who choose to live in a rural, wild area can share the land peacefully. After all, getting out and enjoying the place we live is one thing that unites us despite our disparate recreational choices.

Thank you for your consideration.

Sincerely,

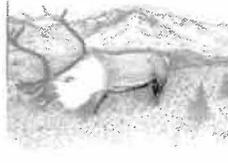


Christine Byl  
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Ch'echalyu



Bedzeyh Ti Xwt' ana



Tonidra Ghetslina



Tsihyu



*Artwork by Knowland Silas*

February 10, 2010

To Whom It May Concern:

This letter is in regards to the moose permits that are issued every year to Minto residents and others as well.

Since this procedure started there have been a lot of complaints from local residents and non residents alike.

Summer of 2009 our village held a general meeting concerning the moose permits and the outcome of the meeting is to have moose permits issued to all local homes in Minto. There are total of 59 homes that should be granted moose permits.

Since this whole moose hunting permits started there has been misunderstandings on both sides and hopefully with your listening and taking into consideration how we feel the moose permits will be granted to the Minto Village People.

Thank you,



Lori Baker  
Chief  
Minto Village Council

Via facsimile

To: Board of Game  
From: Sierra Club Alaska Chapter  
Re: Regulatory proposals before the Board's February-March Fairbanks meeting  
Date: February 12, 2010

On behalf of the Alaska Chapter of the Sierra Club, I am submitting the following recommendations on proposals before the Board during its Fairbanks meeting.

1. Proposal 55. Support. This proposal, as well as proposals 58, 59-60, and 65 would retain and expand the protected zone for wolves on state lands adjacent to Denali National Park. We prefer Proposal 55 because it would provide the largest area of protection for these animals.

The existing buffer zone, slated to sunset next month, has not offered adequate security for the park's wolves as they move out of their park sanctuary into the Stampede ("wolf townships") during the winter.

Retaining and expanding these buffer zones is critically important in view of declining numbers of park wolf packs. On state land outside the existing buffer zones, no limits on the number of wolves that can be trapped and liberal sport hunting bag limits has been shown to be contributing to the decline.

2. Proposal 5. Support. This proposal would exempt national park system areas in Denali NPP (GMU 19D) and Gates of the Arctic NPP (GMU 24) from the existing regulation that allows resident hunters to use artificial lighting to take black bear cubs, and sows accompanied by cubs, from October 15-April 30. This drastically unsportsmanlike method, when combined with excessive bag limits (3 bears, no closed season in GMU 34; 5 bears, no closed season in GMU 19D) is contrary to Congressional and National Park Service prohibitions on intensive management in units of the national park system.

3. Proposal 131. Oppose. This proposal by ADF&G would revise the current regulation governing wolf and bear control on federal lands. Currently ADF&G is required to get the consent and formal approval of federal agencies before conducting such predator control. Proposal 131 would amend the regulation to require the Department to merely consult with federal agencies before undertaking such predator control.

Federal policy does preclude predator control on federal conservation system units or other federal lands, but generally disallows such control except in cases of emergencies such as the imminent loss of a specific wildlife population, e.g. fox reduction to protect depleted and recovering geese populations on the Yukon Delta NWR, or the extirpation of rats on islands of the Alaska Maritime NWR in order to restore sea bird populations.

Federal policy also requires NEPA analysis of predator control proposals on federal lands, and adherence to agency policies and congressional standards governing wildlife management on federal lands. Proposal 131 would attempt to override these essential measures.

In sum, the current policy of consent and formal approval by federal agencies provides necessary safeguards and the flexibility to undertake predator control in those situations where such action is found to have a scientifically valid basis. Accordingly, we recommend that the Board reaffirm existing policy by rejecting Proposal 131.

4. Proposal 32. Oppose. This proposal would establish a wolf and brown bear predator control plan for units 9C and 9D, including national wildlife refuge lands on the Alaska Peninsula and Unimak Island. Except in cases of emergencies, and then only after other non-lethal measures have been exhausted, predator control plans of this kind are not permitted on units of the national wildlife refuge system.

We recommend that the Board reject the proposal in favor of directing ADF&G to cooperate with the U.S. Fish and Wildlife Service in exploring possible alternatives to the proposed plan.

5. Proposal 132. Oppose. This proposal would establish a predator control plan for Unimak Island, a designated wilderness unit of the Alaska Maritime NWR. By definition, predator control on units of the National Wilderness Preservation System is incompatible, except perhaps in cases of imminent loss of a prey population.

We recommend that the Board reject the proposal in favor of directing ADF&G to cooperate with the U.S. Fish and Wildlife Service in exploring possible alternatives to the proposed plan.

Thank you for considering our views.

Jack Hession  
Executive Committee  
Alaska Chapter Sierra Club

RECEIVED  
FEB 12 2010  
BOARDS

To Alaska Board of Game:

I have trapped fur myself many years ago. I favor trapping, but i do not approve of making residential areas a mine field for family pets.

It is inconceivable to me that good people with good intentions cannot come up with a restriction policy on trapping that will protect in a reasonable way residential areas.

Suppose it was my 5 year old son that got caught. It would depend on where the trap caught him whether he could get free by himself.

If a man were to find this proposal distasteful because of the amount of area involved, or his fear of losing his right to trap. The men involved in trapping should immediately consider that a public outcry over this issue will only intensify over the coming years, and cause more intrusion into the fur trade than you have here.

I personally feel that trapping in areas that catch a lot of dogs does nothing but infuriate those who do not trap. It would be intelligent to find an answer to this problem.

I would correlate the rules of using high power rifles near residential areas to trapping near residential areas. No mans right to hunt or feed his family has been infringed by the high power rifle ban, it was reasonable and was addressed properly and did nothing to start us down that terrible road of never being able to use our guns.

I see nothing in this resolution that would cause any detriment to the hunting or trapping community.

If someone on the Game Board finds fault here, let that person step forward and write a proposal that will work.

Thank You for your Attention  
Kerry MacLachlan  
pobox 524  
healy ak 99743

RECEIVED  
FEB 12 2010  
BOARDS

PO Box 549  
Healy, AK 99743

Alaska Board of Game  
Po Box 115526  
Juneau, AK 99811-5526  
FAX: 907-465-6094

February 10, 2010

Dear Chairman and Members, Alaska Board of Game:

This letter is to provide written response on the proposals being considered by the Alaska Board of Game at the 2010 meeting. Please consider the following comments on select proposals.

**Proposal# 58: Please Adopt, *Expand the current wolf protection area – the no-take “buffer” closed to trapping and hunting of wolves – to encompass a greater portion of the traditional ecological range of Denali National Park wolves.***

Wolves that are protected within Denali National Park and who range onto state lands across the East and Northeast boundaries of the park, are being trapped by a few recreational trappers and hunters. Prohibiting wolf trapping within these lands will protect wolves that have tremendous biological and scientific value.

This is not an attempt to increase land to the park. The NPS will have no jurisdiction. Furthermore, there is no subsistence use of these wolves. The lands being requested in this no-take buffer cover more of their traditional range

Denali wolves have suffered major losses along the boundary and the boundary vicinity from just several recreational trappers and hunters. A few opportunistic hunters shoot wolves out on the open Stampede tundra. At least one guide takes clients out in the open Stampede tundra and to the park's edge to shoot park wolves. These wolves are habituated by friendly, non-threatening contacts during the summer, and thus have little chance of survival during the trapping season.

ADF&G has argued against the buffer because wolf population numbers are not endangered. This disregards the science that has documented the importance of functioning wolf groups, and families not just their population size. Hunting and trapping losses disrupt their incredibly complex social biology. Wolf numbers can eventually rebound, but the integrity and meaningfulness of the wolf group is impacted by losses.

The complexities of the wolves' social biology is importance for their prey and a healthy ecosystem. Climate change may bring unexpected weather events, and differences in habitat that are not necessarily the norm. Management that recognizes the importance

of wolves is an ecosystems approach that will help keep prey populations resilient and able to adapt to changes we may face.

Surveys indicate that wolves are the species that most of Denali's visitors wish to see. Since the state is spending millions of dollars to increase tourism, it seems sensible to protect the small population of wolves that are so significant to many park and state visitors, not to mention Alaskans.

The wolves that will be protected by this buffer have many values. It is not just about the viewing opportunities for park visitors but also the long-term impact on the ecosystem, the cruelty involved by the devices used, and educational opportunity of living around wolves. I urge you to manage for all values, not to maximize sport and hunting trapping for a few (next to a National Park).

**Proposal 72: Please Adopt, *Restrict the use of traps near certain recreational and residential areas in Unit 20***

As the central Alaskan population increases, there is increasing hunting and trapping pressure in and around subdivisions, popular trails and recreation areas. Traps set near homes and neighborhoods have injured and killed numerous pets and have even caught humans. Dangerous high-power traps (i.e. Conibear 330's), often in child attractive cubbies, have been set where a child could easily be killed.

Last Spring my dog was caught in a conibear set less than 25 feet off the road, right in Healy. The sounds of her screams, as my husband and I tried in vain to release her, are forever etched on my mind. I had attended The *Share the Trails Workshop* before my dog was caught. Despite knowing how to open a conibear, my husband and I were unable to open the trap with the writhing dog in it. She survived only by drastic means with a power saw. Similarly, my neighbor's dog was caught in a trap right behind our homes.

One of the pleasures of living in Alaska is the opportunity to enjoy the wilderness, and solitude of out-the-door walks with one's dog. Yet, as a Healy resident, I feel shut-out of the woods and trails around me because of traps. Traps, snares and conibears potentially lie concealed, like land mines, in our community, on and next to popular local trails, and even along the roads. One trap was set on the highway next to a schoolbus stop. Humans and numerous dogs have been injured or killed by traps set within close proximity of homes and community use areas. Since trappers can set concealed traps anywhere we can walk, it is impossible to share a trail with a trapper, without fear of pets being trapped on or off leash. Perhaps the real sharing would be to provide safe areas for people to walk with their pets and children, especially in areas just adjacent to roads, trails and even private lots and homes. That is the intention of this proposal.

Proposal # 72 requests less than 18 square miles of safe land to walk with one's dog. Compared to the many miles available to trapping, it seems so little to ask. This proposal only affects trappers that will not go outside of town to do their trapping. A community needs a safe area for walking and recreating . Trappers should trap outside of town.

Department comments suggest the proposed closure within this proposal will be hard to recognize. I can work with the department to help define topographical features that will make this easier.

**Oppose # 4: Do Not Adopt.** Establish a "no closed" hunting season on coyotes in 20.

The ecological effects of removing coyotes from the landscape to increase Dall Sheep numbers will be damaging. Coyotes, and wolves play a vital ecological role and their removal can have a devastating impact on the health ecosystem.

Furthermore, Traps, snares and conibears used to kill coyotes, are inhumane, indiscriminate, and a threat to public safety.

Thank you for the opportunity to comment.

Sincerely,

Barbara Brease

**RECEIVED****FEB 12 2010****BOARDS  
ANCHORAGE**

Dear AK Board of Game:

For the past 10 years, I've been teaching a High School Science class in the Denali area as well as Prince William Sound. We have seen and wondered the wolves of the Toklat many times including the unfortunate time when the alpha male and female were killed just a few years ago. There is no biologic reason for expanded the current buffer zone so that trapper can not trap these special wolves... BUT, I am still asking you to consider preserving one special place for our children's children. The one place left in the USA that is still accessible to the average person should be preserved as it was intended. Please consider extending the current buffers so that the wolves that are habituated to human activity mortality is less than the current 30 percent and more like the typical success rate seen in other parts of the state. thanks for your consideration.

matt farling

**RECEIVED****FEB 12 2010****BOARDS  
ANCHORAGE**

Dear Board of Game Members:

I am a strong supporter of wildlife conservation and a big fan of the State of Alaska. I grew up in Louisiana and now live in Texas. I have always been impressed by your vast and impressive wildlife assets and grow puzzled about why there is always growing desires to destroy it. I can't imagine that any income your State gains from hunting exceeds the vast income you received from wildlife tourism, media shows, and all other activities based on seeing wildlife rather than killing it.

I have studied the many proposals facing you on this issue. I understand you have a tough job. I sincerely hope you listen to comments. I visit your State solely to enjoy viewing your vast wildlife and hope you continue to welcome such visitors by preserving this great treasure. I strongly support the proposals numbered as 55, 58, 59, 60, and 65. If protected and left alone, the wolf population will balance itself in nature. These proposals will allow such balancing to occur. I also encourage you to defeat proposals 56, 57, 61, 62, 63, and 64. They do nothing but upset nature and foster greed. A state with your vast territory and natural wealth should do all that is possible to keep these animals healthy and natural. The proposals are modest and will not cause any hardship to current to hunters and trappers.

I strongly encourage you to support the proposals 55, 58, 59, 60, and 65. I hope to continue to visit your State to enjoy these treasures you have and hope you keep.

Thanks for listening.

Donnie Hagan  
Director, Program Review & Assessment  
McLennan Community College  
Waco, Texas  
254-299-8441

**Anja Phenix  
Po Box 133  
Healy, AK 99743**

**Healy, January 30, 2010**

**Alaska Department of Fish and Game  
Board Supports Section  
PO Box 11526  
Juneau, AK 99811-5526**

**Re: Comment in support of proposals 72, 3 / Interior Region**

**Dear Sirs,**

**I am writing in strong support of above proposals. The freedom and legality of setting traps in and around our community with close to no limitations has brought on a wave of trappers who set their traps right along our public roads, established recreational trails and in immediate proximity to private homes. A staggering number of people and pets have suffered injuries, some severe, and this issue has become a concern for public safety and quality of life in our community.**

**Proposal 72 was carefully drafted to protect areas frequented by our local trappers, who care deeply about their community and have trapped responsibly here for decades. It however would discourage careless and out-of-town trappers who disregard any ethical standard in their attempt to catch a fur bearer.**

**Proposal 3 would furthermore help in reducing the wanton waste and needless suffering of captured animals brought on by those trappers who at times go several weeks without checking their sets.**

**Thank you for your consideration.**

**Sincerely,**

**Anja Phenix**

1 February 2010

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

RECEIVED  
FEB 04 2010  
BOARDS

RE: Game Board Proposals 55-65 relating to the Denali Wolf Buffers, February 26th-March 7<sup>th</sup>, 2010 Board Meeting

I **oppose** Proposals 56, 57, 61, 62, 63 and 64 which would eliminate the Stampede Trail and Nenana Canyon wolf trapping buffer areas.

I **support** Proposals 55, 58, 59, 60 and 65 that would retain the buffers or increase their extent.

There is a long history surrounding the issue of creating buffer areas to protect Denali Park wolves that move north and east out of the Park in winter and get trapped or shot on adjacent lands. Following a decade of concerns raised by various people, the Game Board created a 600 square mile buffer northeast of the Park in 1992 to protect Park wolves from being taken in a proposed new wolf control program. When approval for the control program failed, the buffer was rescinded.

After several more years of continuing concerns, in 2000 the Board established a small 29 square mile buffer west of the Savage River near the Stampede Trail. This was expanded to its present size, 90 square miles, in 2001. This buffer was thought to be too small to fully protect Park wolves that were known to range east of the Savage River in winter, but the Board wanted to keep the buffer as small as possible. Numerous people for and against the buffer commented to the Board on this issue during 2000 and 2001 and the Board deliberated the proposals extensively

In 2002 I was appointed to the Game Board and served during the time that a second buffer was created to protect Denali wolves that ranged out of the Park east of the northeast corner of the Park. This buffer, now known as the Nenana Canyon Buffer, was created after two Denali wolf packs were eliminated by trapping just outside of the Park's northeastern boundary. This was in the Parks Highway corridor containing numerous private houses and businesses that serve tourists. Again, both sides of the issue were well represented at the Board meeting and provided extensive written and oral comments.

The Board deliberated several proposals pertaining to creating the new buffer including one encompassing 146 square miles. These were repeatedly amended to reduce the size of the buffer and the final version with the eastern boundary set at the Intertie Power Line was thought to be too small to adequately protect the Park's wolves, but it was the best

that could be passed given strong opposition. In 2004, a new Board reduced the size of this buffer even farther, down to about 25 square miles.

Events during subsequent years proved that both buffers were too small. The presence of radio-collared wolves provided evidence that Denali wolves occupied areas east of the Savage River along the Stampede Trail and were trapped there adjacent to the buffer. These included the alpha female of the Toklat (East Fork) Pack, one of three packs providing Park visitors the opportunity to observe wolves during summer along the Park road.

Now, data provided by the National Park Service indicate that the number of radioed wolves taken during 6 years after the buffers were established exceeded the number taken during the previous 11 years (18 wolves vs. 14). For all radioed wolves in the Park, the percentage of wolf mortality caused by humans through trapping and shooting rose from 17% to 30% after 2002. And there has been an increasing trend in the number of wolves taken in this area as determined by the State's pelt sealing records. The number taken in 2007 was double that of the average annual harvest of the earlier years. These data indicate that the existing buffers are far too small to provide adequate protection for Denali's wolves. This argues strongly for retention of the buffers and for expanding their extent.

I am particularly concerned about the Nenana Canyon Buffer. Most of the attention seems focused on the Stampede Trail Buffer, but no packs have been eliminated in that area in contrast to the Parks Highway corridor where two packs were eliminated by trapping and shooting. Gordon Haber provided locations of radio-collared Denali Park wolves that moved east of the Park boundary during the winters of 1995-2002. The enclosed map shows these locations in relation to the road corridor that all wolves moving east out of the Park would have to cross. Trapping and hunting within the corridor would expose these wolves to mortality. To me, retention and expansion of the Nenana Canyon buffer is just as important as retaining and expanding the Stampede Trail buffer.

Why is it important to protect Denali's wolves in and near the buffers? Opponents have argued that the few wolves taken by trappers and hunters do not significantly affect the Park's wolf population, but this is not the issue. There is a proven history of severely reducing or eliminating Denali's wolf packs in the Parks Highway Corridor and along the Stampede Trail by trapping and shooting. These wolves are part of three packs that provide virtually all of the viewing opportunities for visitors along the Park road. This is one of a very small number of places in Alaska where wild wolves can reliably be viewed. About 19% of Denali's bus passengers have seen wolves in recent years. This is a high number of people and this viewing opportunity draws thousands of visitors to Denali each year and provides significant revenue to the state.

Again, there is ample documentation that those packs viewed by Denali's visitors have been reduced or eliminated by trapping and shooting near the buffers and there are indications that this problem will continue or worsen. Eliminating the buffers would

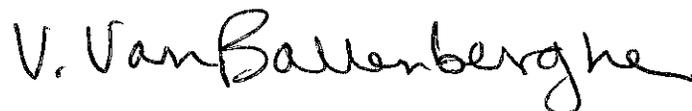
obviously further aggravate this situation. Expanding the buffers would help alleviate the problem. In essence, this is an allocation problem—the small number of wolves taken annually by the small number of trappers in this area should be re-allocated by the Board to potential viewing within the Park by about 400,000 visitors annually.

Residents of Alaska who wish to see wild wolves would also benefit from measures to preserve and expand the buffers. Residents have very few wolf viewing opportunities along Alaska's road system as wolves are trapped and shot nearly everywhere and are scarce or wary as a result. But the first 15 miles of Denali's road is accessible without a permit whenever the Park is open. This area is within the territory of one of the three Denali packs commonly seen by visitors. Those driving the paved Denali Park road can often see or hear wolves or see their signs. This provides an important opportunity for Alaska's residents to experience one of our most important wilderness species, one that many people revere and wish to experience by seeing wolves, hearing them howl or seeing their signs.

Finally, retaining and expanding the buffers would provide additional continuity for scientific studies of Denali's wolves and their prey, research that has been in progress for decades. Denali is one of a very few places in North America with naturally regulated predator, prey and habitat systems that can be studied to provide benchmarks to contrast with systems heavily influenced and manipulated by humans. There is a proven history at Denali where studies have been affected by severe reduction or elimination of wolf packs adjacent to the Park. This can be prevented in the future by prudent measures adopted now to retain and expand the buffers.

I strongly urge the Board to reject those proposals that call for the elimination of the buffers, and to adopt proposals to retain and expand the buffers so as to protect Denali's wolves to the greatest extent possible.

Sincerely,

A handwritten signature in black ink that reads "V. Van Ballenberghe". The signature is written in a cursive, flowing style with a prominent initial "V".

Vic Van Ballenberghe

***Alaska Trappers Association  
PO Box 82177  
Fairbanks, AK 99708***

RECEIVED  
FEB 04 2010  
BOARDS

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

February 1, 2010

Dear Chairman & Members of the Board:

On behalf of the nearly 900 members of the Alaska Trappers Association, we wish to share our opinions on several proposals which you will be considering during your Region III meeting February 26 – March 7, 2010.

We SUPPORT Proposal #1.

We see this as a simple “house-keeping” proposal, which is designed to correct a recording error.

We are OPPOSED to Proposal #2.

We believe that it is prudent to allow a small incidental take of lynx during November, when seasons for other furbearers are open. We propose that the current regulation book be modified to emphasize that “The lynx season is considered closed during November. Trappers are not allowed to target lynx during November. If a lynx is taken in a set intended for another species, the set must be removed and the hide must be sealed within five days.”

We are STRONGLY OPPOSED to Proposal #3.

This proposal would place an unrealistic financial burden on trappers. In addition, it would require trappers to be outdoors in hazardous weather conditions. The proposal is simply not practical.

We SUPPORT proposal #6.

We believe that trapping of black bears and sale of black bear hides should be allowed.

We take NO POSITION on Proposal #17.

We defer to the judgment of local trappers on this matter. We wish to emphasize that harvest of lynx during November would not pose a threat to the stability of lynx population.

We DEFER to the Department of Fish & Game on Proposal #26.

If ADF&G determines that harvest during open water seasons in the autumn and spring could result in over-harvest of the beaver population, then we would support the proposal.

We have NO POSITION on Proposal #40.

We wish to point out that winter moose hunts often interfere with trappers in the area. Hunters on snow-machines ride over traps, damage animals in traps and sometimes even steal fur and traps. We request that the Board direct ADF&G to provide a brief orientation to persons obtaining permits regarding the proper etiquette for use of trapline trails.

**We OPPOSE Proposal #55.**

We believe that there is no biological reason to limit harvest on the wolves in these areas. We disagree with the premise that harvest of a few wolves will cause visitors to stay away from McKinley Park. We note that the proposal refers to "subsistence" trapping. There is no such differentiation of trapping into categories such as "recreational, personal use, commercial, etc."

**We SUPPORT Proposals #56 & 57.**

We believe that the existing closed areas should be eliminated.

**We OPPOSED Proposal #58.**

The second "bullet point" on page 79 would impose unnecessary restrictions on trapping for other species based on only a perceived threat to wolves. We note that the proposal attempts to differentiate between "subsistence" and "recreational" trapping. No such categorization exists. We also note that the text in the "Other Solutions Considered" section reads like a direct threat to the State Administration and to the Department of Fish & Game. All Alaskans should be offended by threats of this nature.

**We OPPOSE Proposal #59.**

The proponents state that hunting and trapping of wolves has been allowed in the area northeast of the Park for decades. The fact that wolves are still common in this area demonstrates that this harvest poses no threat to the wolf population in the area. The proponents repeatedly refer to wolves in this area as "Park" wolves. We wish to emphasize that all wildlife within the borders of our State belongs to the people of Alaska. No wolves *belong* to the Park.

**We OPPOSE Proposal #60.**

The Stampede Trail Closed Area should be eliminated.

**We SUPPORT Proposal #61.**

The Stampede Trail Closed Area should be eliminated.

**We take NO POSITION on Proposal #62.**

Establishment of a predator control area is a long, involved process. We defer to the judgment of the Board and the Department if they wish to pursue this course of action.

**We SUPPORT Proposals #63 & 64.**

These two closed areas should be eliminated.

**We OPPOSE Proposal #65.**

This proposal represents a classic example of "buffer creep," where boundaries are pushed further and further with no biological justification. The comments regarding the perceived influence of trapping on the spread of lice is a classic

example of "pseudo-science," with no factual basis. The Park Service should be embarrassed to have their name on this proposal.

**We OPPOSE Proposal #71.**

There is already opportunity for youth to hunt and trap on Creamers Refuge. There is no evidence that competition from adults is denying opportunity to youths. We see no need to close the Refuge to hunting or trapping by adults.

**We OPPOSE Proposal #72.**

Trappers in the vicinity of Healy have taken an active approach to identifying and educating people who may be trapping too close to homes and sub-divisions. The real problem is free-ranging dogs. We recommend that the proponents identify and educate irresponsible dog owners to keep dogs on leash. The proponents mention that humans have been caught in traps. We investigated all reports of such incidents. We were unable to identify any specific dates or people involved. We conclude that these stories are nothing more than rumors.

**We OPPOSE Proposal #95.**

No problem exists with the beaver population in this area. "If it ain't broke, don't fix it."

**We SUPPORT Proposal #96.**

By expanding the trapping season for mink and weasel, the seasons will be in alignment with seasons for other species. We also note that trapping of weasels in this area is apparently another instance of where trappers can be of service to the entire community. We applaud ADF&G for submitting this proposal.

**We DEFER on Proposal #97.**

If local users determine that snaring is an effective tool and the Board opts to approve this practice, then we have no opposition. We suggest that any resulting regulation be worded to clarify whether neck snares or foot snares are authorized.

We appreciate the opportunity to participate in the regulatory process.

Sincerely,

A handwritten signature in black ink that reads "Randall L. Zarnke". The signature is written in a cursive style with a large, stylized 'R' and 'Z'.

Randall L. Zarnke, president

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

RECEIVED  
FEB 11 2010  
BOARDS

Dear Board of Game,

As a frequent visitor to your beautiful state, with a special interest in Denali National Park and its Toklat wolf pack, I would like to comment on some proposals coming up at the February Game of Board meeting.

I support proposals 55, 58, 59, 60 and 65 which would expand the buffer zones around Denali and reduce opportunistic trapping of the Toklat wolves when they cross the Park boundaries in search of winter prey.

I strongly oppose proposals 56, 57, 61, 62 and 64 because these proposals reduce or eliminate current buffer areas around Denali and put the survival of the Toklat wolves in jeopardy.

The demise of the Toklat pack would disappoint thousands of visitors while it would impact only a handful of trappers.

Thank you for taking my comments in consideration.

Sincerely,



Andrew Gach  
3431 Mill Creek Court  
Port Angeles, WA 98362  
(360) 457-8808

RECEIVED

FEB 11 2010

BOARDS

Dear BOG,

I wanted to write you to express my **opposition** to Proposals **56, 57, 61, 62, 63, and 64**. Even though I am not a resident of your state I still travel to Denali National Park every couple of years and as I spend my money in your state I feel I should have some voice concerning the wildlife and wolves I enjoy watching.

I want to write you to express my **support** for proposals **55, 58, 59, 60 and 65** for the reasons below.

- Hundreds of thousands of visitors travel the Park road hoping to see these wolves every year, and 19 percent of these visitors have the great fortune to see or hear these wolves.
- Few individuals would be impacted by an expanded buffer zone. There are only about five trappers targeting these wolves on the Park border.
- The trappers who target the Park wolves are extraordinarily successful. Research shows that 30 percent of Park wolf mortality is human caused, i.e. trapping and shooting. This is because the wolves are habituated to human activity and the trappers know exactly where to set their traps.
- The proposals seeking to expand the buffer zones are modest, extending the protected zone for wolves by less than ten miles. This is no land grab, because there are many millions of acres of land outside the proposed buffers where wolf trapping and hunting are legal.
- Gordon Haber, a wildlife biologist, spent a lifetime studying Denali's Toklat wolves and was a tireless advocate for expanded buffer zones around the Park. He died in a tragic plane crash while tracking these wolves last fall, and expanded buffer zones would be a fitting memorial.

Thank You for your time and consideration,

Austin Brisco – 4750 Benning Dr Houston TX 77035

RECEIVED  
FEB 11 2010  
BOARDS

February 8, 2010

Dear BOG,

Please help protect the Toklat wolves. **This is a critical issue and could determine the long-term survival of the Toklat pack lineage.**

**Please SUPPORT the following proposals:**

Proposals **55, 58, 59, 60 and 65**

These proposals seek to **expand** the current buffer zone adjacent to the Denali National Park boundary.

**Please OPPOSE the following proposals:**

Proposals **56, 57, 61, 62, 63, and 64**

These proposals seek to **shrink or eliminate** the current buffers, thereby allowing trapping right up to the Park boundary.

Hundreds of thousands of visitors travel the Park road hoping to see these wolves every year, and 19 percent of these visitors have the great fortune to see or hear these wolves.

Few individuals would be impacted by an expanded buffer zone. There are only about five trappers targeting these wolves on the Park border.

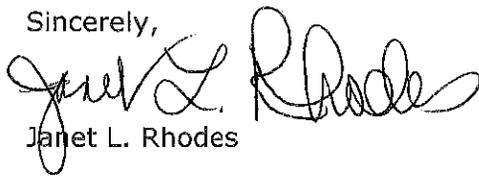
The trappers who target the Park wolves are extraordinarily successful. Research shows that 30 percent of Park wolf mortality is human caused, i.e. trapping and shooting. This is because the wolves are habituated to human activity and the trappers know exactly where to set their traps.

The proposals seeking to expand the buffer zones are modest, extending the protected zone for wolves by less than ten miles. This is no land grab, because there are many millions of acres of land outside the proposed buffers where wolf trapping and hunting are legal.

Gordon Haber, a wildlife biologist, spent a lifetime studying Denali's Toklat wolves and was a tireless advocate for expanded buffer zones around the Park. He died in a tragic plane crash while tracking these wolves last fall, and expanded buffer zones would be a fitting memorial.

These magnificent, sentient beings need all the help they can get. Thanks for your time and consideration.

Sincerely,

  
Janet L. Rhodes



**Ms. Janet Rhodes**  
13913 SE 275th St  
Kent, WA 98042

RECEIVED  
FEB 11 2010  
BOARDS

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

WRITTEN COMMENTS FOR THE MARCH MEETING

I strongly recommend that you reject Proposals 56, 57, 61, 62, 63 and 64 which would eliminate the Denali Wolf Trapping Buffers.

Please pass a proposal which would retain or expand the existing buffers.

Denali Park's wolves are too valuable to be lost year after year adjacent to the Park during winter when they follow the caribou out of the Park. The buffers created in 2000-2002 have proven too small to protect these wolves and it is time to retain and expand the buffers so that adequate protection is provided. Proposals 55, 58, 59, 60 and 65 all would provide some degree of additional protection. I strongly urge the Board to meld these together so as to protect the wolves to the greatest possible extent.

Thank you,



Ashley Redfern  
41431 G. Redoubt Ave.  
Soldotna, AK  
99669

RE: pages 99-101 Proposal: 72, Log #I-10S-G-018 - Inbox - Yahoo! Mail

Page 1 of 1

**From:** Lee Purcell [mailto:leecloward@yahoo.com]  
**Sent:** Sunday, January 17, 2010 10:56 AM  
**To:** Tibbles, Kristy R (DFG)  
**Subject:** pages 99-101 Proposal: 72, Log #I-10S-G-018

Dear Ms Tibbles,

Subject: In favor of boundaries being set for trappers to trap outside residential areas in and around Healy

This is my story and why I am in favor of this proposal passing.

It was March 2008, I stepped outside with my dog to let her do her business, and this particular time, she ran off. I jumped into my car and started driving around trying to find her. I did this for 2 weeks with my husband searching everywhere for my dog Gertie.

Then my husband fixed our 4 wheeler and we went out once again looking for her. We went into old Healy, up to the top of one of the roads and turned around, on the way back, I thought I heard a wolf or dog and had my husband stop the 4 wheeler and check things out. We now could hear crying and the sound of a chain. He looked up and called her name, it was poor starved and skinny Gertie, it's a miracle that she was still alive after two weeks at - 20. We pryed the leg hold trap opened with our bare hands and released her.

I contacted Fish and Game and showed them the spot that she had been trapped, from the pictures it was a lynx set and out of season. Plus no-one checked the trap for TWO WEEKS.

All we are hoping for is to please move trapping activities out of the community. I understand that trappers have been trapping here for 20 years or more, the difference is that Healy's population has grown and is not the same place as it was 20 yrs ago, there are many more children and family's here now.

The intention is not to try to eliminate trapping activities, it is an important part of life in Alaska. Alaska is huge, 1/3 the size of the United States, certainly trappers could find other areas to trap besides our backyards.

Respectfully submitted,  
Lee Cloward  
907-347-6157

Board of Game Comments  
ADF&G  
PO Box 115526  
Juneau, Alaska 99811-5526

RECEIVED  
FEB 12 2010  
BOARDS

REGION III PROPOSAL #16

“Support”

I am giving my support for Proposal #16, to displace the hunting pressure on sheep and provide a more equitable hunting opportunity for residences of Alaska.

Sincerely,



Eric Eriksen  
17670 Lena Loop Road  
Juneau, AK 99801

Board of Game Comments  
ADF&G  
PO Box 115526  
Juneau, Alaska 99811-5526

RECEIVED  
FEB 12 2010  
BOARDS

**REGION III PROPOSAL #16**

**“SUPPORT”**

**Support the Proposal #16;** I support the proposed increase the Dahl Sheep hunting season for Alaska residents, and/or the decreased Dahl Sheep hunting season for non-residents.

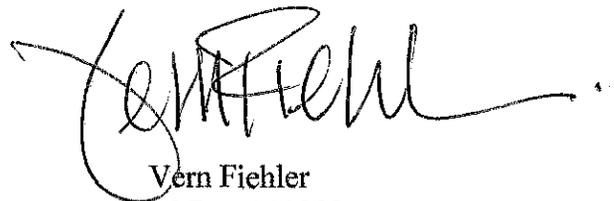
**Issue:** My experience as well as the ADF&G harvest data, demonstrate that the non-resident guided hunters are displacing the success of resident non-guided hunters. These well financed, often mechanized, high pressure commercial guided operation’s, are taking an inequitable advantage over the traditional resident sheep hunters and their possibility of success.

**What will happen if nothing is done?:** In comparison to local hunters, I believe the guide industry will efficiently take more and more of our Alaskan resource, with the only limiting factor being, how many hunters they can book at the annual sheep convention. Alaskan residents will continually be disenfranchised, by being out resources by our guides, who set up, not only camps, but “spoof camps” in the preseason, thus blockading many Alaskan resident hunters from numerous drainage’s for most, if not all, of the hunting season.

**Who is likely to benefit?:** All Alaska resident, ( Region III ) sheep hunters.

**Who is likely to suffer?:** Only 2 days less in the field for the nonresident hunters

**Other solutions considered?:** Yes, and I support those solutions that share fairly our Alaska Fish and Game resources with priority,,, first to ALL Alaska State Residents,,, second to SOME of our Nations Citizens,,, and third to a FEW of our Nations Allies.



Vern Fiehler  
POBox 210283  
Auke Bay, Alaska. 99821  
789-1085 or 789-2100

RECEIVED  
FEB 05 2010  
BOARDS

February 1, 2010

PO Box 60354  
Fairbanks, Ak. 99706

Alaska Board of Game

RE: Oppose Proposals 69 and 70, to allow some motorized vehicles within the Wood River Controlled Use Area

Dear Sirs:

I am opposed to allowing any type of motorized vehicles into the Wood River Controlled Use Area. I have hunted in the Gold King area since 1983 and have been a full time resident of Gold King since 1999. In that time I have seen the moose hunting in this area go from good to poor due to the large number of hunters and vehicle traffic on the Rex Trail and Gold King airstrip. The moose get pushed back away from the main trails.

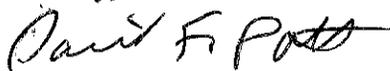
My only alternative is to hunt the Wood River Controlled Use side of the Rex Trail, as it is closed to motorized vehicles. I have to pack a moose to the trail, but the peace and quiet of the hunt is worth it.

If the Wood River Controlled Use Area is opened up to any motorized vehicles, soon all the winter trails will be rutted and full of large mud holes. A large portion of the few trails in the controlled use area are over wet, swampy areas, that cannot take much summer time use. This will make the trails nearly useless until a lot of snow covers the ruts. Once a trail is torn up and rutted, it is never the same, and will never be repaired. Just look at the Rex Trail today. The time of unrestricted summer time use of trails by large vehicles is over.

I urge you to reject Proposals 69 and 70.

Thank you for considering my comments,

Sincerely,



David F. Pott

dpott@hughes.net

RECEIVED

FEB 08 2010

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

BOARDS

Jenny Pursell  
P.O. Box 33578  
Juneau, AK 99803

February 6, 2010

Dear Chairman Judkins and Board of Game Members,

I am sending my comments to you regarding the following regulation proposals which will be heard during the 2010 Fairbanks BOG meeting.

Proposal 55- support

Proposal 58- support

Proposal 59- support

Proposal 60- support

Proposal 65- support

Reasons for regulation proposal{s} support: These proposals would expand the no hunting/trapping buffer zones adjacent to Denali National Park to protect wolves migrating across the National Park's boundary. These buffer zones are important in protecting wolves primarily for the wildlife viewing opportunities that tourists so often strive for while visiting the Park. Nineteen percent of visitors to Denali National Park see and/or hear wolves. Wolves are one of the top three wildlife species that visitors hope to see while visiting our state. Wildlife viewing is an important contributor to our economy. Hunters and trappers will continue to have ample areas to hunt and trap wolves outside of these proposed "expanded buffer zones".

Proposal 56- oppose

Proposal 57- oppose

Proposal 61- oppose

Proposal 62- oppose

Proposal 64- oppose

Proposal 66- oppose

Reason for proposal{s} opposition: I oppose these proposals because I believe that it is inequitable to allow ten wolf trappers/hunters in the area to harvest wolves which annually amounts to a 30% mortality rate of the wolves in the area. This harvest should not be allowed for a small number of trappers when thousands of tourists hope to view them. In my reasoning the buffer zones can be expanded for wildlife viewing opportunities while hunters and trappers can continue harvest outside of these expanded boundaries.

Proposal 67- oppose This proposal would implement a predator control program for black and brown bears in Unit 20C. There is no science based justification for this program.

Thank you for your time and attention to my position on these proposals.

Sincerely, Jenny Pursell



FEB 08 2010

BOARDS

- Proposal 3 - 5 AAC 92.095 - Opposed - due to climatic conditions + remoteness of most lines I can't always get to my line every 72 hr.
- Proposal 7 - 5 AAC 92.0044 - Support - It would make early season baiting more feasible - ice and snow conditions are often poor to dangerous on April 15 + later
- Proposal 16 - 5 AAC 85.055 - Support - reducing conflict between resident sheep hunters and guides/non-residents would be a good idea.
- Proposal 32 - 85.045 - Support - reduce the spike/fork animals would help the bull hunt
- Proposal 33 - 85.045 - Oppose - there is not enough recruitment into the population now - let them grow a year or two.
- Proposal 46 - 5 AAC 85.045 - Oppose - Minto residents don't need additional advantage over other area users
- Proposal 50 - 5 AAC 85.045 - Oppose - I have extensive experience in this sub-unit especially the western portion - and unit 20C is a very low density moose area. It is an area close to major population centers of Fairbanks Minto, Nenana, + Mealy Hot Springs - with very very easy access - this subunit can not sustain addition harvest which is what setting a later hunt date would do. I

proposal 50 units have never had a problem with meat care in this unit. 20C can't sustain a higher harvest.

proposal 51 - 5 AAC 85.045 - oppose - a later moose season in 20C will result in a higher harvest which the the area's moose population can't sustain. a very low density area

proposal 52 - 5 AAC 85.045 - oppose - do not expand the non-resident season in 20C - if anything cut it by 5 days - this is a very low moose density area already. Resident hunters don't need more competition from non-residents in this area

From: Dm Ilgenfritz

4362 York Ave.

Fairbanks, AK 99709

49 year resident of Unit 20

RECEIVED  
FEB 10 2010  
BOARDS

ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526

Re: Passage of 55,58,59,60 or 65

Dear BOG:

I support **expanding** the buffer zone adjacent to the Denali National Park boundary.

Let the wolves live. They are what makes Alaska a great American wilderness.

Nobody needs to trap wolves in this day and age, least of all this famous pack. There is no good reason for it. The rest of the country is watching and cares.

Sincerely,

*Betty + Tom Quattrochi*

Betty Quattrochi/Tom Quattrochi  
860.404.2013  
23 Old Kings Road  
Avon, CT 06001

RECEIVED  
FEB 13 2010  
BOARDS

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

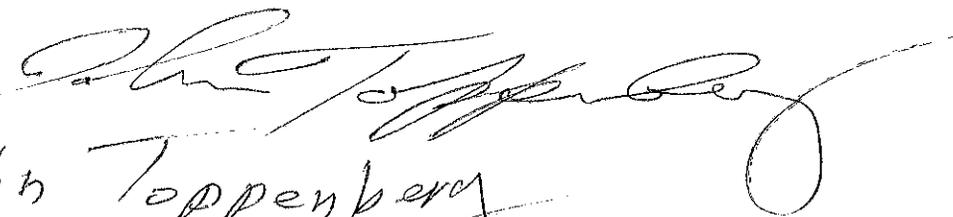
RE: Denali Wolf Buffer Proposals

I oppose Proposals 56, 57, 61, 62, 63 and 64. These would eliminate the Denali Wolf Trapping Buffers.

I support Proposals 55, 58, 59, 60 and 65. These would retain or expand the existing buffers.

Denali Park's wolves that travel out of the Park in winter are trapped and shot on adjacent lands. This reduces the ability of Park visitors to see and hear wolves during summer along the Park Road. Thousands of visitors come to Denali to see wolves and other animals. This brings a lot of revenue to Alaska. Please reject proposals to eliminate the buffers and adopt proposals to retain and expand the buffers.

Sincerely,

  
John Toppenberg  
37950 Toppenberg Ave,  
Sterling, AK 99672

RECEIVED

FEB 10 2010

BOARDS

February 8, 2010

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

Greetings:

As a 32-year Alaska resident, I want to express my support for the adoption of any of the following regulatory proposals currently under consideration:

**Proposal 55, Proposal 58, Proposal 59, Proposal 60 or Proposal 65**

Any of these would add a layer of needed and deserved protection for wolves in the eastern section of Denali National Park. To protect these wolves in their habitat which now lies outside of the Park boundary provides for far greater good in general than does killing them by one or two trappers. Continuing to allow them to be killed not only diminishes their long-term viability and their value to scientific study but it also threatens the continued enjoyment by thousands of Park visitors of these particular animals and this particular pack. To say that killing many of them every winter does not interfere with these activities not only defies logic but casts doubt on the validity and legality of wildlife management in Alaska and provides incentive and basis for more public and legal opposition to current practices. I think that opposition is needed and would ultimately succeed. But, for the Board of Game, the preferred alternative should be to make a relatively small concession and show that every once in a while it is willing to accommodate a large percentage of wildlife users, in Alaska and elsewhere. To do otherwise is short-sighted.

By the same token, I oppose the proposals which, concerning these wolves, would make an already untenable position much worse. Specifically, **I oppose Proposal 56, Proposal 57, Proposal 61, Proposal 62, Proposal 63 and Proposal 64.**



Wayne Hall  
P. O. Box 190455  
Anchorage, Alaska 99519

FEB 10 2010

BOARDS

BOG Interior Meeting (Feb. 2010) Proposal Evaluations Submitted  
by the Alaska Wildlife Alliance

#1- support - This proposal would shorten beaver trapping season in 20B and 20D by 10 days

#2- oppose—This proposes that lynx trapping season be changed to Dec.1- Feb.28. The current season is a 2 bag limit from Nov.1- Nov.30. We oppose the lengthening of the season by 2 months.

#3- support—Proposes a mandatory 72 hour trap set check in all of Region III units.

#4- oppose—This proposal would establish a no closed season on coyotes in Unit 20 and there would be a daily bag limit of 10 coyotes.

#5- support—Proposes that Denali National Preserve and Gates of the Arctic National Preserve be exempt from the allowance of taking black bear with artificial light in a den site and would also exempt the same National Preserve areas from the taking of sow and cubs and cubs from a den site

#6- oppose—Proposes to allow the trapping of black bear and selling of hides in Units 12, 20, and 25. This proposal encourages poaching for profit and this proposal would decrease black bear in these GMUs. This proposed decrease is not based on sound science.

#7- oppose—This proposal would allow an earlier season for baiting black bear by 2 weeks in GMUs 12, 19, 20, 21, 24 , and 25- there is no scientific basis for this liberalization of the bear baiting season.

#8- oppose— This proposal would liberalize black bear baiting in Units 12, 19, 20, 21, 24, and 25 by the allowance of licensed guides and assistance guides to set up bait stations prior to their clients arrival to these GMU areas.

#9- oppose— This proposes that registered guides be allowed to maintain 10 bait stations in Units 12, 19, 20, 21, 24, and 25- this proposal is essentially a de-facto predator control program and there is not sound science that substantiates this regulation proposal.

#10- oppose— This proposal would allow the salvage of either black bear meat or black bear hide or the salvage of both in Unit 20. Our position is that if an animal is killed, that all parts of the animal should be utilized and for the hunter to leave hide in the field is wanton waste and is not acceptable.

#11- oppose-. It eliminates the verification process as to age and gender as well as eliminating valuable opportunities for F&G to gather biological data from the animals.

#12 – oppose- At a time when budgetary considerations are, as ever, a considerable concern eliminating such a fee puts more of the cost of supporting F&G on the general public instead of on the hunters where it belongs considering the purpose of the activity.

#13 – support – This restricts motorized access in the 40Mile area for caribou hunting as well as adjusting some seasons to favor residents over non-residents.

#14 – support – Reduces 40Mile Caribou season to prevent overharvesting and rearranges some seasons to better fit hunt circumstances for resident vs non-resident.

#15 – support - Reduces herd number objectives for 40Mile Caribou Herd to more realistic levels

#16 – support

#17 – The AWA is not commenting on this proposal

#18 – The AWA is not commenting on this proposal

#19 – oppose – Establish special seasons for youth and disabled hunters in 20e for caribou. Giving preferences to one group of hunters over another, other than in subsistence situations, seems at odds with the state constitutional intent. Too, there would be little ability to enforce against abuses such as accompanying adults making the actual kill and attributing it to the child or disabled.

#20 – oppose – Increase harvest limits for 40Mile Caribou Herd in 20e. If, as the BOG maintains, this is an area needing aerial hunting of predators it seems odd that there would also be a need to raise the limit on the harvest. If, as the author suggests, the herd is in danger of overgrazing then aerial hunting in the area should first be stopped before the limit is raised.

#21 – support – This requires hunter education, safety blazers, etc, for the 40Mile Caribou Herd hunts. The author describes it as presently almost amounting to combat hunting.

#22 – oppose – Moose do not know when they are on private land or public land so this becomes a means by which a steady influx of moose would be subject to essentially unrestricted hunting.

#23 – support – Reduce number of permits for Tok Management Area Dall Sheep hunts. Proposal is concerned that the present harvest limits are too generous and rams are being taken in too great a number just as they reach legal size.

#24 – support – Restrict non-resident moose and caribou harvests in Upper Yukon/Tanana Predation Control areas of 12 and 20. If an area is being subjected to aerial hunting, there should also be a cessation of non-resident hunting as the stated purpose of the aerial hunting program is to provide more game for residents.

#25 – The AWA is not commenting on this proposal.

#26 – support – Shorten beaver trapping season in 20b. Author is concerned the beaver population in this area is being overharvested and beavers are being taken in the poorer-fur-quality months.

#27 – oppose – Lengthen brown/grizzly season in 20a to reduce hunter confusion regarding other seasons. If the hunters can't figure out when harvest seasons are in place or aren't it hardly seems right to possibly kill even more bears just to compensate for this lack of comprehension.

#28 – oppose – Allow use of bait and lures in brown/grizzly bear hunting in 20a, b, and c. Author worries there is no “predation control” plan in place and the grizzlies are now taking black bears are the black bear baiting stations.

#29 – oppose – Much the same proposal as #28 only addresses 20c as opposed to most of GMU 20. Another attempt at predation control disguised as something else.

#30 – oppose – Much the same as #28 and #29. Proposal wants to allow taking of brown/grizzly bears by use of bait stations as a means of “predator control” in GMU 20c.

#31 – oppose – Expand brown/grizzly season in 20a and 20c. Again, another de facto predator control effort disguised as an attempt to adjust seasons. This one affects areas close to Denali

Park and the reason given is the population of these bears is on the rise. It would appear that the “desirable” number of bears has been determined without any real science to it as a set number beyond which the population cannot be allowed to go in some people’s views, regardless of changes in other significant factors.

#32 – 35 - oppose – Changes the antler size/tine-count for bulls in 20a. The AWA's position is that it is time to take the pressure off the very largest bulls because the impact of targeting the very largest and oldest bulls is to negatively impact the gene pool. It is time that the Department took a hard look at this issue, focusing on the science.

The wildlife must come first. That is first, ahead of the goal of giving more hunters the opportunity to hunt. If there are not enough moose to satisfy hunter demand, the solution should be to limit the number of hunters allowed in the field: not to limit legal moose by allowing the taking of only bull moose with 2, 3, or 4 brow tines. It is the AWA's position that spike fork hunts are a positive development, but that the Department needs to go farther in taking the pressure of the largest bulls.

#36 – support – Requires non-resident hunters in 20a to be guided by a guide or relative in 2<sup>nd</sup> degree of kindred. Presently, non-residents can be dropped off to hunt on their own which sometimes creates problems with those unfamiliar with the area or the state laws.

#37 – The AWA is not commenting on this proposal.

#38 – oppose – See proposals 32 – 35.

#39 – oppose – Delete muzzleloader season for moose in 20a and create one in November in 20b. On the face of it this seems a reasonable change until you go further down the proposal and encounter the following:

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Trapping predators in Unit 20A will continue to be hindered, and the income of trappers in that area will continue to be drastically reduced.

#40 – oppose – See proposals 32 – 35..

#41 – oppose – Expand resident muzzleloader season in 20b for moose. This is in the Creamers Field Wildlife Refuge, an area surrounded by residential property and used by recreational hikers, joggers, etc. By increasing the amount of hunting allowed it would only seem to be increasing the chances of someone being injured as they use the area for non-hunting activities.

#42 – oppose – Reauthorize antlerless moose hunt in 20b. This is a case of conflicting goals. On the one hand F&G says there is a surplus of antlerless moose in the area: *Fairbanks Management Area (FMA)* – The purpose of this antlerless hunt is to provide opportunity to harvest a surplus of antlerless moose in the FMA and potentially reduce moose–vehicle collisions and nuisance moose problems.

At the same time further in the proposal (which is being made by F&G) they want to continue aerial hunting of wolves and bears:

Finally, extensive burns in northcentral Unit 20B will provide excellent habitat in the future. With improving habitat, continued high predator harvest, and relatively mild winters, we can expect continued high productivity and survival of moose, along with increased yield.

Once again, we see a continuance of aerial hunting even though the stated goals which should result in its cessation having been attained.

#43 – oppose – Allocate a number of moose permits for young hunters.

#44 – support – Eliminate antlerless moose hunts in portions of 20b. Concern is cow moose may be overhunted.

#45 – support – Restrict use of motorized vehicles and aircraft in Minto Flats Management Area. Author is concerned wildlife is being pushed out of normal habitat ranges by extensive use of these methods.

#46 – The AWA is not commenting on this proposal

#47 - oppose – Modify muzzleloader hunt for antlerless moose in 20b to extend season. Author says present season for this area (Creamers Field Wildlife Refuge) is concurrent with bow hunting season and conflicts arise. By making this change it would subject moose to essentially an even longer season of hunting.

#48 – oppose – Open a muzzleloader permit hunt for moose in 20b. Again, we see where aerial hunt proponents claim there is a lowered moose population due to predation while at the same time we see more moose hunt expansion being proposed.

#49 – oppose – Establish an archery-only season in 20b for moose. This is being proposed as a way of reducing the incidence of moose/vehicle collisions in the area. However, again, we see an area that is being suggested for aerial hunting while at the same time claims are being made there are already too many moose.

#50 – support – Modify hunting season for moose in 20c to open 5 days later. Author's reason is by making it slightly later the temperatures will be lower and less meat spoilage will occur.

#51 – support – Much the same as #50.

#52 - oppose – Expand moose season in 20c from ten to twenty days. Author says it will take some pressure off moose populations in 20a. However, again this is an area in which there is a constant clamor for aerial hunting yet it would seem there are ample moose present without it.

#53 – oppose – Remove restriction on shooting white moose in 20c. F&G says the regulations concerning shooting white moose are confusing. However, if a hunter can't tell the difference between a white moose (presently non-hunttable) and a normally-colored moose perhaps he or she should not be using a gun. F&G wants this as a means of reducing regulatory confusion, hardly a sufficient reason to reduce the chances of a gene pool of white moose becoming established for the future.

#54 – oppose – Much the same as #47.

#55 – strongly support – Expand the closed-to-trapping areas for wolves in 20a and 20c. These are the areas close to Denali National Park. Much of the trapping done here is recreational which yields a small amount of incidental revenue to a few trappers. However, the economic value of the wolves in this area to visitors to Denali Nat. Park is demonstrably much greater. These proposals would expand the no hunting/trapping buffer zones adjacent to Denali National Park to protect wolves migrating across the National Park's boundary. These buffer zones are important in protecting wolves primarily for the wildlife viewing opportunities that tourists so often strive for while visiting the Park. Nineteen percent of visitors to Denali National Park see and/or hear wolves. Wolves are one of the top three wildlife species that visitors hope to see while visiting our state. Wildlife viewing is an important contributor to our economy. Hunters and trappers will continue to have ample areas to hunt and trap wolves outside of these proposed "expanded buffer zones".

This proposal is being made by the Denali Citizens Council, a group apt to be very familiar with these two aspects of the situation.

#56 – strongly oppose – Eliminate Stampede and Nenana River Canyon closed areas in 20a and 20c. This proposal would remove these buffer zones and open the areas to extensive wolf trapping. Their reasoning is as follows per their statement:

**WHO IS LIKELY TO BENEFIT?** Alaskan hunters and trappers. **WHO IS LIKELY TO SUFFER?** Maybe a few wolves, but we do not believe this will bring any biological concern, will not affect the view ability of the wolves in the Park, will not affect the big money going to the companies providing wildlife viewing opportunities, and it will not affect the local economy. With or without the buffer zones, these things will not be affected.

Note how only “maybe a few wolves” will be affected. If, as the proposal claims, this will affect only a few wolves then its benefits (tenuous ones at best) are apt to be equally slight. They put forth no documentation to support their claims that other aspects such as viewing, etc, will not be affected but seem to feel a simple statement of such as fact is sufficient.

#57 – strongly oppose – Remove Nenana Canyon closed area and allow more wolf trapping and hunting. This is yet another attempt to eliminate any possibility of a Denali Buffer Zone. To read the author’s proposal there are portions which seem to imply the wolves of Denali Nat. Park know the park boundaries and would stay within them if only such trapping were permitted:

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Unit 20C will continue to be managed at low densities. One third of this Unit is Denali National Park, which supports two large populations of predators that are protected from harvest. The area certainly is

capable of sustaining larger moose populations; all that is required is controlling predators.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Yes,

Unit 20C has too many predators. Studies show that the limiting factor for moose population in this area is too lightly harvested predator population. The wolves will still have Denali National Park for protection. Once the animals leave the boundaries of the park they should be eligible for harvest.

Contrast the concerns of the author with previous proposals for expanding moose hunting in this same area (20c) due to high populations of moose. It seems odd there are enough moose to hunt when some want the limits expanded but there are insufficient moose when some want the wolf trapping expanded.

#58 – strongly support – Expand areas in 20 closed to wolf trapping (then follows precise descriptions of areas affected). This is a proposal by the AAC with the following reasoning:

**WHAT WILL HAPPEN IF NOTHING IS DONE?** The significant economic, scientific, and ecological value of these Denali wolf family groups (packs) will continue to be degraded and/or lost. The growth potential for tourism based on wolf viewing at Denali, and the unique opportunity for science will not be fully utilized.

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

**WHO IS LIKELY TO BENEFIT?** The several hundred thousand visitors to Denali National Park will benefit from increased wolf viewing success, thus enhancing the tourism economy at Denali and the state. Scientifically, the long-studied Denali wolves will suffer far fewer trapping /hunting losses, and thus provide opportunity to study long-term population and social dynamics of

unexploited wolf family groups (packs). The solution proposed here would establish the only protected wolf family groups anywhere in Alaska, thus providing unique scientific opportunities.

**WHO IS LIKELY TO SUFFER?** There are only three or four primary recreational wolf trappers who would be impacted by the proposal, and as these individuals have other accessible areas to replace the area that would be closed to take by this proposal, the impact would be negligible.

It is worth noting there are only a few recreational trappers apt to be affected by this expansion. This is not a matter of subsistence revenues being reduced as some might claim.

#59 – strongly support – Expand Nenana Canyon areas closed to wolf trapping (then follows precise descriptions of boundaries involved). This is a recommendation by the AAC as follows:

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Wolves will continue to be trapped and shot as they move across the Park's boundaries onto adjacent lands. Losses due to hunting and trapping have severely reduced or eliminated certain wolf packs in recent years and this may continue. Thousands of park visitors, Alaska residents and nonresidents alike, will be deprived of seeing wolves in the Park. Wolves may also continue to be caught in snares and they may continue to break the cables but retain the snare loops around their necks. Wolves with festering wounds with broken snare cables will continue to be observed in the Park with very negative public perceptions regarding trapping. Long-term scientific studies in Denali National Park of wolf biology, ecology and predator-prey relationships will continue to be disrupted as hunting and trapping losses have severe impacts on wolf pack continuity, territory relationships and long-term impacts of wolf predation on moose, caribou and Dall sheep.

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

**WHO IS LIKELY TO BENEFIT?** Many hundreds of thousands, perhaps millions, of visitors to Alaska over the years who would have improved odds of seeing a wild, sub-arctic wolf. Many thousands of Alaska residents who have very limited opportunities to see and hear wild wolves anywhere else along the road system except Denali. Biologists who conduct studies on Denali's wolves and related species whose studies would be protected from severe impacts due to hunting and trapping losses of wolves. The Board of Game would benefit by being perceived as supporting viewing of wildlife as an important and valid use of Alaska's wildlife, in addition to consumptive uses.

**WHO IS LIKELY TO SUFFER?** A very small number (less than 5) of hunters and trappers who would lose harvest opportunities.

Again, it can be seen this is a matter of the interests of a few recreational trappers (stated less than 5) versus the thousands of visitors, both resident and non-resident to the park.

#60 – strongly support – Expand areas in Nenana Canyon closed to wolf trapping in 20a and 20c.

#61 – strongly oppose – Eliminate Stampede Closed Area in 20c regarding wolf trapping. Author claims:

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Yes, Unit 20C has too many predators. Studies show that the limiting factor for moose populations in this area are too lightly harvested predator populations. The wolves will still have Denali National Park for protection. Once the animals leave the boundaries of the park they should be eligible for harvest.

#62 – strongly oppose – Establish aerial hunting program for wolves in 20c. Author notes:

Adopt a wolf population reduction or a wolf population regulation program in accordance with 5AAC 92.110.

- Remove wolf buffer zones from Unit 20C.
- Liberalize methods and means regulation for taking wolves from moving snow machines and possible aerial management of wolves.
- Set a reasonable time for the management of the wolf population program, which ensure recovery of the moose population.
- Other regulations as the board determines necessary to achieve a successful recovery of the moose population.

#63 – strongly oppose – Eliminate Stampede and Nenana Canyon closed areas in 20a and 20c. Author notes:

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED? Yes.**

There is no "loss" of product or harvest for the viewing uses of wolves in the park if the restrictions outside the park boundary are removed. The additional harvest improves the quality for local hunters and trappers.

This is a very disingenuous claim of no “loss” for obviously if wolves from that area of the park are being taken they are no longer available for viewing by visitors to the park.

#64 – strongly oppose – Open Stampede and Nenana Canyon closed areas in 20a and 20c to wolf trapping. Author notes:

Open the Stamped Closed Area and the Nenana Canyon Closed Area in Units 20A and 20C for hunting and trapping of wolves. Get rid of these closed areas/buffer zones.

**ISSUE:** No biological reason for Stampede Closed Area (SCA) and Nenana Canyon Closed Area (NCCA) for hunting and trapping wolves.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Loss of opportunity to harvest renewable resource. Wolf population recovers very quickly.

#65 – strongly support – Prohibit taking of wolves in portion of 20c (description of area concerned is west of Parks Highway which is approximately the Denali Buffer Zone). This is being proposed by the superintendent of Denali Nat. Park.

#66 – strongly oppose – Establish Intensive Management area in 20c for wolves.

#67 – strongly oppose – Establish Intensive Management area in 20c for bears. Wording is almost identical to #66 with the exception of the species involved..

#68 – strongly support – Establish a controlled use area in portion of 20a to prohibit use of motorized vehicles above the 2500-foot level. Area is relatively free of scarring from such vehicles at the moment and the author would like to see it stay that way.

#69 – oppose – This creates a motorized vehicle access permit drawing for the Wood River Controlled Use area in 20a for moose season. As worded it seems to want to take some permits from the present allocation and make them into permits allowing motorized access. Either way the same number of moose would be allocated but with this proposal there would be ATV, etc. access for winners of the special permits. (Generally, motorized vehicles tend to lead to trail degradation and conflicts with private land owners within affected areas.)

#70 – oppose – Restatement of #69 but restricting use of ATV's to equipment and meat transport. Obviously, this would be almost impossible to enforce.

#71 – oppose – Create hunting/trapping area for youth in Creamers Field Migratory Waterfowl Refuge. Again, it creates a special category of favored users for a commonly-held resource not to mention increasing the chances of negative interactions with residents and trail-users in that area.

#72 – strongly support – Restrict use of traps near certain residential and recreational areas in 20c. (Description of affected area places most of this in the Healy township area.) Author notes:

**ISSUE:** Public Safety: Body-gripping\* traps near homes and human habitation/recreational use areas, are an existing and increasing safety risk within our community (Healy/Denali Borough). These devices kill and maim companion animals and non-target animals, and can injure children and adults. Locally, several of these devices have caught companion dogs and at least two adults. Traps pose a threat to children who may be attracted to cubbies or who may accidentally step in them. In the Healy/Denali Borough, these devices have been found along the Parks Highway, near homes, on popular recreational trails, and in one case, right next to a school bus stop.

#73 – The AWA is not commenting on this proposal

#74 – support – Modify bison season dates for Delta area hunts for residents and non-residents. This is being proposed by the Delta Bison Working Group.

#75 – oppose – Allow take of bison on same day airborne in Delta area. Being proposed by Delta Jct. F&G Advisory Comm. The rationale included seems a bit clouded in its expression:

Recently, ADF&G has been issuing increasing numbers of drawing permits to attain the needed harvest. The number of permits is now more than the hunt area can accommodate. Hunters

frequently complain about too many hunters in the field, interfering with each others' hunts, further reducing success rates. Allowing permit winners to hunt the same day airborne should improve hunter success rates, allowing the department to better manage for the herd size objective.

If there is congestion in the field as noted in the third sentence then increasing the number of hunters by allowing airborne hunting, as noted in the sentence thereafter, hardly seems the logical response. Hunters going about by foot are not likely to enjoy having spent hours stalking a bison only to have a plane overfly it and spook it or land some hunters nearby to take what they have been hunting all that time.

#76 – The AWA is not commenting on this proposal..

#77 – support – Make illegal to shoot specified radio-collared bison in the Delta Bison Hunt area. Proposed by ADF&G, it strives to reduce the loss of valuable study animals which have been radio-collared. Obviously, shooting one ends any study in which it was involved and then requires the danger, cost, and effort in collaring another to take its place as well as having to start fresh with the new one.

#78 – oppose – Eliminate the non-resident closed area for caribou in 19a. Author says everyone will benefit but obviously if residents then have to compete with non-residents for a limited resource they will be negatively affected. Too, this is the McGrath area in which an aerial hunting program has been in place for a while. If there are now enough caribou to allow non-resident hunting then the aerial hunting program should be stopped as obviously its goals concerning subsistence hunting have been met.

#79 – oppose – Liberalize moose hunting regs in 19d. This is a proposal by F&G that states there are now sufficient moose in this

portion of GMU 19, which includes McGrath and has been subject to aerial hunting since 2003, that their numbers should be controlled before they overpopulate. However, there is no accompanying proposal to eliminate aerial hunting even though it would appear the program's goals have been met. Proposal note:

**WHAT WILL HAPPEN IF NOTHING IS DONE?** The additional opportunity that has developed since the inception of predation control will not be used. Further, the moose population in the MMA may continue to grow and become stressed by density dependent effects.

#80 – The AWA is not commenting on this proposal

#81 – The AWA is not commenting on this proposal

#82 – The AWA is not commenting on this proposal

#83 – oppose – Eliminate the early harvest reporting requirement for wolves taken in 19d (predation control management area). Given the predation control is supposedly an emergency response situation it would seem only smart to keep as close a tab on what is happening as possible. By removing this requirement it means an excessive population reduction may not be noticed until too late.

#84 – oppose – Implement predator control for wolves in 21e. After a great mishmash of figures and studies and such it says the moose numbers are at a density of 1.2 moose per sq. mile, desired is 1 moose per sq. mile, and this plan should be implemented to prevent it falling below that 1 moose figure. However, what is of concern is buried in there is wording that essentially makes this a permanent and ongoing wolf kill program as is evident from the following:

(C) the primary objective of the Unit 21(E) wolf predation control plan is to reduce wolf numbers and wolf predation on moose within the 2,617 square mile MMA if necessary to the lowest level possible; this plan also has a goal to maintain wolves as part of the 125 ecosystem within Unit 21(E); the minimum wolf population objective for Unit 21(E) is 29–31 wolves, which represents an 80 percent reduction from the pre-control minimum estimated fall wolf population of 146–156 (18–20 wolves per 1000 square miles); a minimum 60 percent wolf reduction from pre-control levels will achieve the minimum desired reduction in wolf predation, and a maximum 80 percent wolf reduction ensures that wolves persist in Unit 21(E);

By holding the wolf reduction to 60 to 80 percent it implies that as a constant goal which, in turn, implies ongoing aerial hunting. The proposal includes the usual provision that such aerial hunting will cease by order of the commissioner at such a time as goals have been met but as we have already seen, this is never done.

#85 – oppose – Implement predation control in 21e immediately. This is essentially the same as #84 only with an urgency. Apparently, the original proposal was made at the 2009 BOG meeting and deferred.

#86 – oppose – Establish a wolf control program in 21e with an effective date of July 1, 2010 and only if moose population declines below the current level. This area is sparsely populated, as noted in proposal #84 regarding it, and so anecdotal information from hunters afield can be quite misleading.

#87 – oppose – Modify restrictions on use of aircraft for transporting hunters for moose, etc. in Koyukuk Controlled Use Area. It would seem the more proper response to the situation would be to provide avenues of enforcement rather than just give in and let folks do as they want regardless of the effects.

#88 – The AWA is not commenting on this proposal.

#89 – support – Allows ADFG more flexibility in where to locate their check station in the Koyukuk Controlled Use Area and also more precisely defines the requirements for meat salvage.

#90 – The AWA is not commenting on this proposal.

#91 – The AWA is not commenting on this proposal.

#92 – support – Clarifies proxy hunt regulations in 21b, 21c, 21d, and 24. This is being requested by ADF&G to prevent circumvention, either intentional or accidental, of proxy hunt regulations.

#93 – strongly oppose – Change Intensive Management Objectives in 21b. Due to a boundary adjustment ADF&G feels there is a need to increase aerial hunting in this area to provide more moose for sports hunters. This is an area very close to McGrath, which is in an area already under aerial hunting procedures.

#94 – The AWA is not commenting on this proposal

#95 – support – Reduce the bag limit for beaver trapping in GMU 25. This is being proposed by the Yukon Flats Advisory Comm. to prevent overtrapping of beaver in the area.

#96 – oppose - Extend end date of mink and weasel trapping season in 26b and 26c. Reason given is the seasons are out of sync with other trapping seasons and that some weasels may ruin meat supplies. Trappers would take them out as a favor to the residents. Improved storage methods of meat would solve that problem without having to trap more animals. Proposal notes there is no sealing info on minks and weasels trapped in the area but they believe few of either are taken. If that's the case, it would seem

odd that more need to be taken to remedy a problem that can be fixed without trapping.

#97 – oppose – Allow black bear snaring in 25d. Proposal says there are many black bears in the area but little hunting. Traditional way was to snare them and the proposal says it would be good to allow a return to traditional ways. Just because something is traditional does not make it a good thing. Warfare between villages was also once traditional but I doubt folks want to resume that activity.

#98 – strongly oppose – Allow any black bears, including cubs and sows with cubs, to be taken in 25d. Again, the proposal says this was once traditional and therefore should be resumed as otherwise there are many bears and few are being taken. See #97 for opposing argument.

#99 – support – Shorten non-resident season for Porcupine Caribou Herd hunts in portions of GMU's 25 and 26. Being requested by ADF&G in connection with joint management by Canada of the shared herd. Apparent reason for population decline noted in herd is excessive number of cows being taken in Canada by hunters.

#100 – oppose - Change season and bag limits on Central Arctic Caribou Herd for residents. Would increase the allowable take to 10 caribou per hunter and would create a spring/early summer hunt. For a hunt to be taking place in or around the calving season would suggest a good likelihood there will be increased calf mortality when the herd rushes to escape the hunters. Calves may be separated from their mothers in the ensuing scramble to escape and may not be able to rejoin them.

#101 – support – Modify caribou bag limits in 26b. This is the Dalton Highway Corridor. Author says present bag limits allow walk-in hunters to take more caribou than they may be able to

carry out through ignorance of what is involved in removing multiple caribou.

#102 – oppose - Modify caribou bag limit and season in 26b for residents to allow spring/early summer hunt of bulls and barren cows. Again, presents possible problem of calf abandonment due to hunting during calving season.

#103 – oppose - Much the same proposal as #102.

#104 – oppose – Expand bag limits for caribou in 26b. Proposed by ADFG this would expand the bag limits for Central Arctic Caribou Herd. Problem arises as noted in proposal that residents of that area would possibly face increased competition from urban hunters.

#105 – support – Develop management plan for Central Arctic Caribou Herd in 26b and 26c. The herd is growing rapidly and the author is concerned that without a well-thought-out management plan it may later require emergency measures to address possible over-use of habitat.

#106 – support – Modify meat salvage requirements for moose in GMU 25. Specifies meat salvage regulations to reduce loss.

#107 – oppose – Open moose season in late autumn/early winter for 26c (ANWR). Federal law already allows a few subsistence permits for the area. Moose are moving into the area due to climatic change but quality/quantity of forage is as yet undetermined to support them. Hunt would take likely draw few participants. Given the last two points it would seem prudent to err on the side of conservatism and wait until more information is available on forage. As noted in the proposal it would seem to affect few people.

#108 – The AWA is not commenting on this proposal.

#109 – The AWA is not commenting on this proposal.

#110 – The AWA is not commenting on this proposal.

#111 - The AWA is not commenting on this proposal.

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#112 – 123 - The AWA is not commenting on these proposals.

#124 – oppose – Re-authorize brown bear tag fee exemptions in Region II. Proposed by ADF&G. This is a de facto predation control plan as it allows hunters who may encounter a brown bear while hunting other species to take the bear without having first purchased a tag.

#125 – 127 - The AWA is not commenting on these proposals.

#128 – oppose – Re-authorize resident tag fee exemptions for brown bear in 18m 22m 23 26a, Proposed by ADF&G. Proposal says kill rates of bears in these areas are low and the removal of the \$25 fee might increase them. Further says population of bears is good. However, at a time when ADF&G is so dependent on tag fees for revenue and being as this is not a large amount being asked of the hunter, this seems almost a de facto intensive management tactic.

#129 – strongly oppose – Allow bear baiting for brown bears in 21d. Author finds it difficult to hunt brown bear in this area using customary methods so is asking to be able to shoot them over bait so his hunting will be easier. No indication given that the bears are overpopulating, a threat to anyone, etc. This is simply the request of a lazy hunter.

#130 – strongly oppose – Open a fall black bear hunt season in 21d and allow use of bait stations. Similar to #129, this is again proposed by the same author with the same lack of real reasons other than a certain laziness.

#131 – strongly oppose – Control of predation by wolves and bears. Proposed by ADF&G, this is essentially an attempt by the state to gain the legal authority by which to pursue aerial hunting on federal lands including lands overseen by the National Park Service.

#132 – strongly oppose – Establish a predator control area for GMU 10, Unimak Island. Proposed by ADF&G. This is an attempt by the state to establish aerial hunting authority over federally managed lands. If the bull-to-cow ratio is insufficient to support good reproduction rates, transplanting bulls from another area would be a more acceptable response rather than what is becoming a knee-jerk reaction to start killing predators indiscriminately. It is questionable of what value the effort is on the island for even the proposal admits that: while this population has not been identified as important for high levels of human use...

Further on the state demonstrates it's real intent as regards state vs. federal authority by way of this proposal, stating:

Unlike the SAP where predator management programs have been conducted entirely on state-owned lands, land ownership on Unimak is federal wilderness land, except for small areas of private land around villages. As such, the Department is working cooperatively with the U.S. Fish and Wildlife Service to obtain support to conduct management activities on these lands. The Department considers this an emergency management condition and it is unclear whether the normal federal permitting process can accommodate this need. As a result, the Department may ask for clarification of intent on the regulation 5 AAC 92.110(j) and 5

AAC 92.115(h) to understand what was intended when immediate management actions are requires to preserve a wildlife population on federal lands.

PO Box 110029  
Anchorage AK 99511

February 8, 2010

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

These are my comments regarding the proposals that the Alaska Board of Game will consider at its Interior Region meeting beginning February 26, 2010.

I **support** proposals **55, 58, 59, 60 and 65**, which would expand the current buffer zone adjacent to the Denali National Park boundary. These modest expansions to the no-take buffer would help protect Denali wolves migrating onto state lands outside the park. This would give the Denali wolves a better chance to survive, and would give the many thousands of park visitors a better chance for a once-in-a-lifetime experience of viewing or hearing these magnificent creatures in the wild.

The proposals would expand the existing buffer zones by only about ten miles. They would not affect the millions of acres outside the proposed buffers where wolf trapping and hunting are legal.

I **oppose** Proposals **56, 57, 61, 62, 63, and 64** which would shrink or eliminate the current buffers and allow trapping right up to the park boundary, for the same reasons stated above.

In honor of Dr. Gordon Haber's tireless work and advocacy for better buffer zones around the park, I would support calling the expanded buffer the "Gordon Haber Wolf Sanctuary."

Thank you for the opportunity to comment.

Sincerely yours,



Susan Super

P.O. Box 3297  
Palmer, AK 99645  
February 10, 2010

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

To Whom it May Concern:

I am writing in support of the upcoming board proposals, 55, 58, 59, 60, 65. In order to increase the Denali National Park wolf pack buffer zone.

These wolves that roam the outskirts of Denali Park are watched, observed and actually loved by many more wildlife enthusiasts than those interested in their pelts alone.

Tourists coming to Alaska report that seeing wolves ranks as one of their top wildlife viewing experiences. For this reason alone, the wolves are worth much more money alive than dead. Wildlife viewers have the right to enjoy seeing a wolf pack that has not succumbed to disarray, simply because one of its members roamed outside of a human-imposed boundary

If for no other reason—please think of how many tourism related operations in the Denali area depend on wildlife viewing to feed their families. Not only tour guides, but lodging, restaurants, pilots, bus drivers..the list is endless.

Please expand the current buffer zone, adjacent to Denali National Park.

Thank you for your time,

Andra Silgailis



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

From: Sharon Lowe  
2100 Minerva Way, Unit A3  
Anchorage, AK 99515

Date: February 9, 2010

Re: Protect Denali National Park Wolves

I am urging you to expand the current buffer zone adjacent to the park boundary as explained in Proposals 55, 58, 59, 60 and 65. This would only affect about five trappers who have been killing wolves on the park border. These five persons would have millions of acres of land open to them for their favorite recreation.

The wild animals of Alaska are a national and world treasure. They are not merely commodities for humans to use for monetary profit. What does this say about Alaskan leaders if you can not respect species other than humans? Cruelty to animals such as "recreational trapping," bear baiting, and aerial killing of wolves denigrates humans and wounds our souls.

2-6-10



Lydia Garvey  
429 S 24th St  
Clinton, OK 73601-3713

Dear Board of Game,

Yes proposals 55, 58, 59, 60 + 65 +  
MIX - " 56, 57, 61, 62, 63 + 64

Wolves are vital to ecosystem  
balance + ecotourism. You are  
blessed to have wolves.

Protect them! Stop the Slaughter!

Your attention to this most  
urgent matter would be much  
appreciated by all present +  
future generations of all species

---

Thank you,



**National Parks Conservation Association ♦ Alaska Regional Office**  
**750 W. 2<sup>nd</sup> Ave. Suite 205, Anchorage, AK 99503 (907) 277-6722**  
***Protecting Our National Parks for Future Generations***

12 February 2010

Cliff Judkins  
Chairman  
Alaska Board of Game  
P.O. Box 25526  
Juneau, AK 99802-5526

Re: March 2010 Board of Game Proposals 2, 4, 5, 7, 8, 9, 12, 15, 17,18, 28,29, 59, 60,  
124,131

Dear Chairman Judkins,

The National Parks Conservation Association (NPCA) appreciates the opportunity to comment on March 2010 Board of Game Proposals. The National Parks Conservation Association (NPCA) is America's only private, nonprofit advocacy organization dedicated solely to protecting, preserving, and enhancing the National Park System. NPCA was founded in 1919 and today has 340,000 members of more than 1,000 are in Alaska.

For several years now, NPCA has provided proposals for consideration and provided written and oral comments on specific proposals that address the conflict we see between the state's Intensive Management approach to wildlife management and the approach the National Park Service is tasked with under its enabling legislation and direction from park regulations, NPS Management Policies and the Secretary of Interior's office. At this meeting we are principally concerned about two specific proposals - #5 (which we support) and #131(which we oppose) – and will comment on the Denali Wolf Buffer (we support #59 and #60), which is the subject of numerous proposals.

**Proposal #131 – Oppose.** This proposal goes directly to the difference in management philosophy between the state and the National Park Service. Proposal #131 is like many of the proposals pending before the board that request the state to institute wildlife management regulations that are contrary to and conflict with the purposes of Alaska's national parks as recognized by Congress in the Park Service Organic Act and the Alaska National Interest Lands Conservation Act (ANILCA).

The state of is directed to maximize opportunity for human consumption of species like moose and caribou. As such, the state has a system of intensive management that targets the systematic reduction of wolf and bear populations and culminates in predator control areas. While this may be the state's approach to wildlife management, it clearly conflicts with the mandate of the National Park Service to not "intervene in natural biological or physical processes," except in rare circumstances (NPS management policies at 4.1) and not to manipulate wildlife populations in order to increase the population of harvested species.

More specifically to Proposal #131, the Park Service's management direction is clearly stated in section 4.4.3 of its Management Policies:

*The Service does not engage in activities to reduce the numbers of native species for the purpose of increasing the numbers of harvested species (i.e. predator control), nor does the Service permit others to do so on lands managed by the National Park Service.*

This clear direction against population manipulation was further refined in a December 19, 2006 letter to the Eastern Interior Alaska Subsistence Regional Advisory Council from the Acting Assistant Secretary for Fish, Wildlife and Parks which stated that

*To summarize, undertaking intensive management practices, including predator control activities as conducted by the State of Alaska, is not allowed on NPS lands*

Recognition of this difference in management philosophy was understood by the Board of Game in 2005 when it changed a short-lived regulation it had adopted in 2004 that only required "consultation" with NPS before including park lands in official predator control programs. The 2005 change to requiring NPS approval before involving any Park Service managed lands in "an activity involving a wolf (bear) population reduction or wolf (bear) population regulation program" is the regulation that is in place today. The existing regulation recognizes that the Park Service's management approach is different and that the Park Service must be able to determine what can occur on its lands through the exercise of its ultimate authority over how park wildlife is managed. Any attempt to change this regulation, such as proposal #131, is both ignorant of the legal realities and whose only purpose is to make a political statement that feeds the anti-federal government sentiment held by some in this state.

NPCA strongly feels that the Board of Game has no authority to set wildlife management policy for Alaska's National Parks, Monuments and Preserves that is contrary to National Park laws, regulations and policies, especially programs that manipulate the populations of predators. Population manipulation and predator control are fundamentally at odds with the purposes for which units of the National Park System in Alaska were created and that must be recognized by opposing Proposal #131..

**Proposals #59 and #60 – Support.** There are several proposals pending before the Board on renewing and expanding the wolf buffer around the north and east edge of Denali National Park. While we are pleased with all the proposals to expand the buffers (see attached map), we particularly support #59 and #60 for the following reasons:

- They are reasonable in size
- They provide adequate protection for park wolves
- They offer clear boundaries that are easy to distinguish by hunters on the ground

We appreciate the board's previous support for wolf buffers in the past and your recognition of the values of watchable wildlife for both Alaska residents and visitors. Unfortunately the current buffers are not large enough to provide adequate protection.

Please consider the following:

- The population of Denali park wolves is currently at its lowest recorded number – just 65 individuals - since radio-tracking began in the 1980s.
- The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%).
- Protecting 3-4 wolf packs, out of 1,500 or more packs statewide, is a reasonable request and a simple way for the board to provide for non-consumptive users.
- In recent years, visitors to Denali National Park have witnessed several wolves with snares and leg-hold devices attached. These incidents create a bad image for hunters and trappers.
- 95% of federal land and 99% of state land is currently open to wolf hunting and trapping in Alaska.
- Tourism provides the primary economic base for local residents in the Denali Borough. Seeing a wolf in Denali is a highlight for many visitors.
- Since the mid 1980s, five wolf packs in the front country of Denali (along the first 15 miles of the park road accessible by private vehicle) have been severely impacted or completely wiped out by hunting and trapping.
- In Yellowstone, the tourism dollar value is calculated to be \$282,000 per wolf, per year.
- In recent years, wolves north of the park boundary have shown a high incidence of lice. Keeping the number of park wolves high helps provide migration out of the park which helps ensure that the park remains a reservoir of uninfected wolves.
- The wolf townships have long been recognized for their habitat value and importance to the park. The Alaska National Interest Lands Conservation Act (ANILCA) originally included the wolf townships within the park boundaries and deleted them with the intent of a land exchange with the State of Alaska to bring them into the park. (Senate Report 96-413, 1980, p. 167)

In 1992 the Board of Game established a much larger 600-square mile buffer (similar to proposal #58) that was subsequently removed when plans for predator control elsewhere in the state fell through.

We oppose all proposals that call for elimination of the Denali wolf buffer zones.

**Proposal #5 – Support.** The National Park Organic Act of 1916, as amended, sets forth very clear direction for how our national parks are to be managed including the fundamental purpose of the national park system which

*“...is to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.”*

As amended in 1978, Congress further emphasized that

*“the protection, management, and administration of these areas shall be conducted in light of the high public value and integrity of the National Park System and shall not be exercised in derogation of the values and purposes for which these various areas have been established, except as may have been or shall be directly and specifically provided by Congress.”*

Alaska’s National Parks created or expanded by the Alaska National Interest Lands Conservation Act of 1980 benefit in Section 101 from language that set forth Congressional intent:

*“to provide for the maintenance of sound populations of, and habitat for, wildlife species of inestimable value to the citizens of Alaska and the Nation, including those species dependent on vast relatively undeveloped areas: to preserve in their natural state extensive unaltered arctic tundra, boreal forest, and coast rainforest ecosystems...”*

Hunting is allowed in National Preserves, but only so far as to not conflict with park purposes. This management direction from Congress is very clear and is in conflict with management direction frequently taken by the Alaska Board of Game. We do recognize that Intensive Management is the state of Alaska’s predominant wildlife law, we just don’t think it should be applied to lands managed by the National Park Service. We are not against hunting, but we are opposed to hunting methods that are contrary to park purposes, such as predator control.

In reviewing the proposals considered at the November 2008 meeting that led to the regulation in discussion in Proposal #5, it is clear these were requested solely to control populations of black bears. Those November 2008 proposals used terms such as “manage bear predation (Proposal #49), “Bear predation on moose calves will remain high without more effective tools to address it” and “to balance predator/prey populations...these actions are taken for that reason only” (Proposal #51) when justifying their case for adopting the proposed regulation.

In reading the Department's recommendations for the November 2008 meeting on these same proposals, you get similar predator control reasons. Department comments in support of Proposal #49 : "...as well as providing for the associated benefit of helping manage black bear predation on moose calves...". And on proposal #51, adoption "could benefit predator management objectives."

Furthermore, the Board's own General Bear Management guidance (2006-164-BOG) states that sows and cubs will be protected "unless it is necessary to consider methods to increase bear harvest as part of a bear predator control program." We can only assume that since the target of the regulation under discussion in Proposal #5 is sows and cubs, then it must be "as part of a bear predator control program."

Because the existing regulation that allows spotlighting black bears in their dens and allows the killing of cubs and sows with cubs in their dens runs contrary to park purposes, we support Proposal #5, to exempt Park Service lands.

#### **Additional Proposals We Support:**

Proposal 2: NPCA supports amending the Lynx trapping season to exclude November. The ADF&G has traditionally managed furbearer harvest to focus on fur quality for setting harvest dates. In addition, Lynx is a species that should be managed conservatively and is susceptible to human harvest as demonstrated in other areas of the United States.

Proposal 15: NPCA supports decreasing the Forty-Mile Caribou Herd (FCH) population management objectives. Low calving rates in the FCH have occurred many times over the last decade which indicates environmental factors such as adverse or changing weather patterns may be limiting the population. Despite six years of intensive predator control the FCH has not increased in size significantly. Historical population levels in the 1950's and 1960's were 50,000 caribou, which by all indications would suggest a much more realistic population size for the herd due to significant shifts in weather patterns, biome shifts, and extensive wildfires in the region. Existing population objectives are not based on current carrying capacity analysis. Without such analysis, population objectives should be conservative to avoid exceeding the carrying capacity of the environment.

Proposal 17: NPCA supports eliminating season dates when lynx pelts are not in prime condition. NPCA does not support the liberalization of the Lynx trapping season to allow harvest during late March for the same reason, poor pelt quality, as well as increased vulnerability due to reproduction cycles.

#### **Additional Proposals we oppose:**

As we have shown, there is a fundamental difference between the state of Alaska's management philosophy and that of the National Park Service. There are a number of additional proposals that we oppose based on their stated objective to reduce bear and/or

wolf populations in order to increase moose and caribou populations on lands managed by the National Park Service.

Proposal 4: NPCA does not support such a liberal season for the harvest of coyotes. Furbearers are managed to promote fur quality and to avoid the pupping season. The proposal does not provide any ADF&G data to suggest coyotes are negatively impacting Dall sheep populations in GMU 20. Indeed, recent Dall sheep research conducted in GMU 13 by the ADF&G indicates nutritional limitations and severe icing are much more significant factors affecting Dall sheep population dynamics than are predators.

Proposal 7, 8, and 9: NPCA does not support baiting and trapping of bears in NPS managed lands. National polls of both hunters and the public clearly, and overwhelmingly, oppose the baiting of wildlife. There is no justification for the liberalization of baiting regulations for bears in NPS managed lands, except as a means of predator control which we've already shown is contrary to Park Service purposes and policies. This proposal is inconsistent with the socially acceptable wildlife policy.

Proposal 12: NPCA does not support liberalizing the brown bear harvest to exclude tag fees for the sole reason of increasing brown bear harvest rates in Region III or to increase "opportunistic" harvest. Brown bear harvest in Region III should be managed conservatively due to the species low reproductive rates and the importance of the species to the integrity of the overall ecosystem. ADF&G funding for brown bear management relies heavily on funds obtained from tag fees.

Proposal 18: NPCA does not support authorizing a hunt for the Chisana caribou herd. There is no indication the current population size can support a harvest, for non subsistence harvest. The BOG has made no customary and traditional determination for this herd, nor has it established an amount needed for subsistence. In addition, the herd has not grown since 2003 indicating natural mortality is matching current birth rates. Approving a hunt for this herd will likely send the population into a decline which is an unacceptable consequence.

Proposal 28 and 29: NPCA opposes the harvest of Brown bears over bait in all NPS managed lands. There is strong public opposition to baiting of wildlife in general. From a management perspective, Brown bears reproductive rates are very low. The harvest of this species must be managed conservatively and the proposal provides no biological need for increasing brown bear harvest, including a predator/prey mortality study indicating moose are being negatively affected by brown bears. There is no justification for approving this proposal.

Proposal 124: The NPCA does not support liberalizing the brown bear harvest to exclude tag fees for the sole reason to increase brown bear harvest in Region III or to increase "opportunistic" harvest. Brown bear harvest in Region III should be managed conservatively due to the species low reproductive rates and the importance of the species to the integrity of the overall ecosystem. ADF&G funding for brown bear management relies heavily on funds obtained from tag fees.

**Summary:**

The diversity and vitality of wildlife on Alaska's national park lands is one of the principal differences between parklands in Alaska and parklands in the Lower 48. Congress made it very clear that the National Park Service is to manage this wildlife for "natural and healthy" populations. The vast majority of these proposals before the Alaska Board of Game that impact National Park lands focus on manipulating predator populations to grow more moose and caribou. This simply cannot occur in a unit of the National Park System.

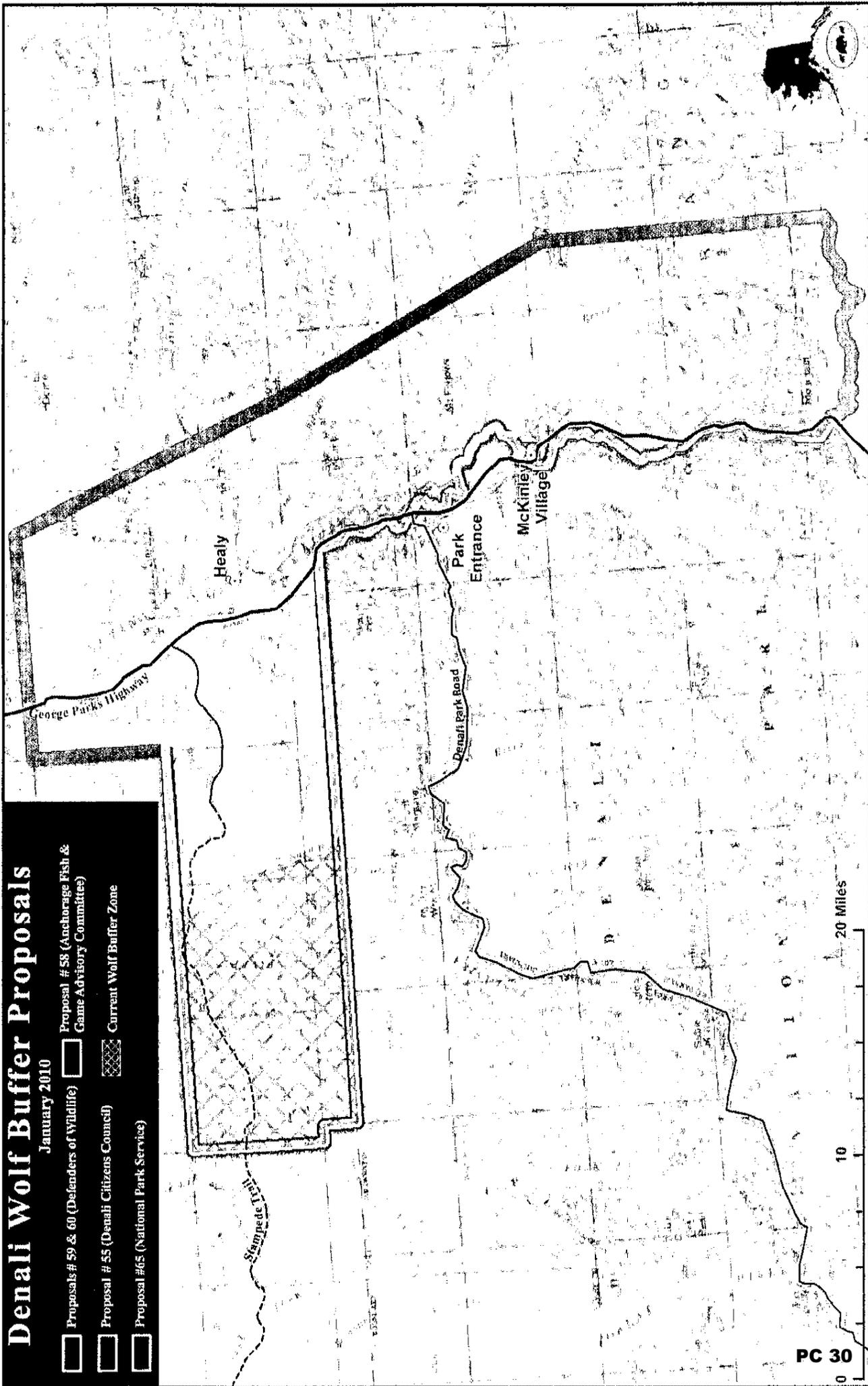
Thank you for the opportunity to comment.

Sincerely,



Jim Stratton  
Alaska Regional Director

cc: Sue Masica, NPS Alaska Regional Director  
Deb Cooper, NPS Associate Regional Director  
Paul Anderson, Denali National Park & Preserve  
Greg Dudgeon, Gates of the Arctic National Park & Preserve



# Denali Wolf Buffer Proposals

January 2010

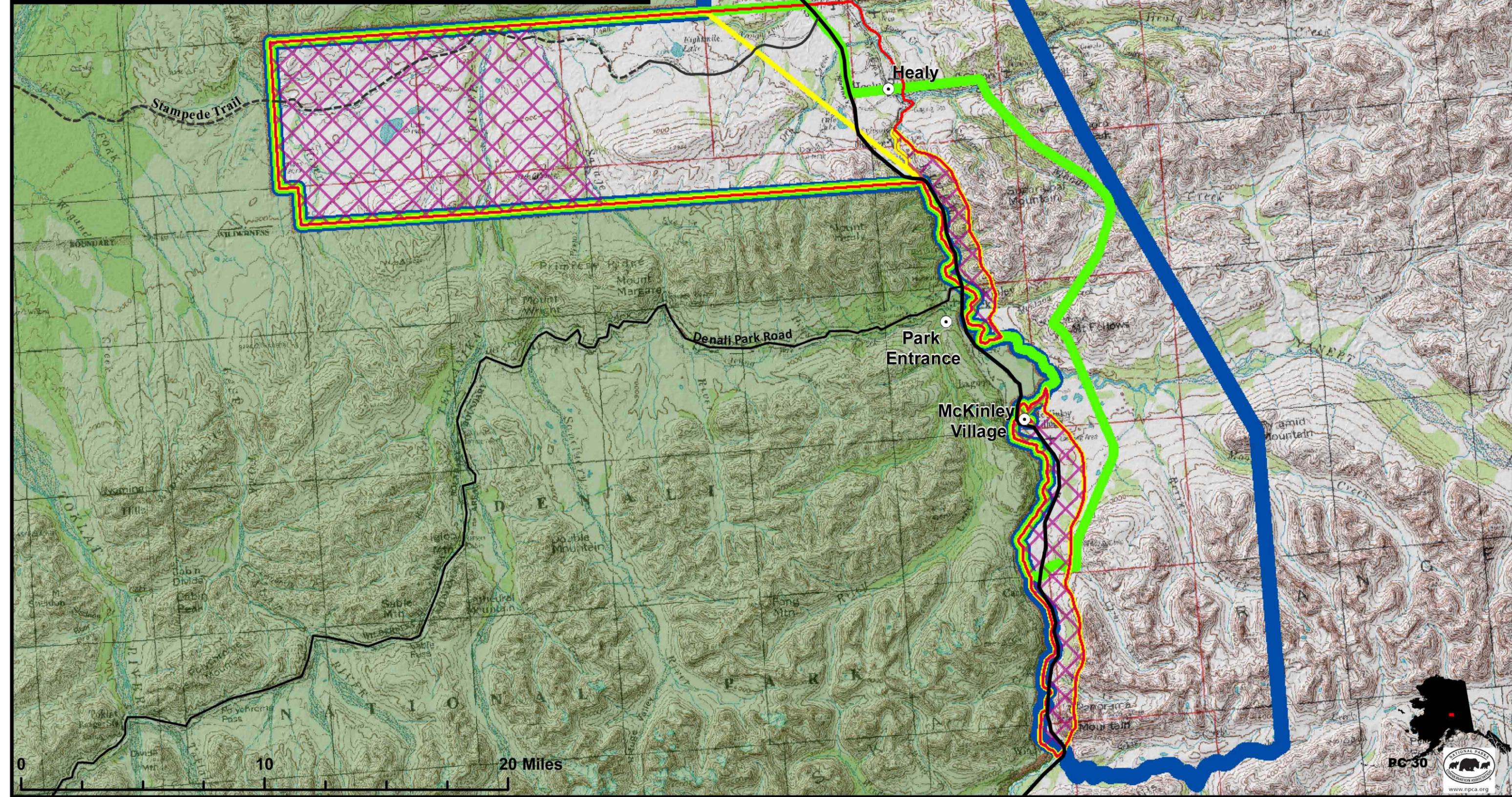
- Proposals # 59 & 60 (Defenders of Wildlife)  Proposal # 58 (Anchorage Fish & Game Advisory Committee)
- Proposal # 55 (Denali Citizens Council)  Current Wolf Buffer Zone
- Proposal # 65 (National Park Service)

PC 30

# Denali Wolf Buffer Proposals

January 2010

-  Proposals # 59 & 60 (Defenders of Wildlife)
-  Proposal # 58 (Anchorage Fish & Game Advisory Committee)
-  Proposal # 55 (Denali Citizens Council)
-  Current Wolf Buffer Zone
-  Proposal #65 (National Park Service)



330 N. Searsport Rd.  
Swanville, Me. 04915  
February 8, 2010

RECEIVED  
FEB 12 2010  
BOARDS  
ANCHORAGE

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

To Whom It May Concern,

I am writing to urge you to support proposals 55, 58, 59, 60 and 65. These proposals would expand the buffer zone to protect wolves adjacent to Denali National Park.

As a past artist-in-residence in Denali National Park the highlight of my residency was seeing a wolf along the East Fork of the Tolkat River. Many visitors to Alaska travel from the lower forty eight in order to see Alaska's magnificent wildlife. My residency was my second trip to Alaska and I hope to return again, but if Alaska keeps up its war on wolves that future trip remains on hold.

Sincerely,

Janice Kasper

RECEIVED

FEB 12 2010

BOARDS  
ANCHORAGE

Please protect the Toklat wolf pack by increasing the buffer zone.

24 years ago I met a Toklat wolf face to face on a river bar in Denali. This wolf's habitat was protected by the park wolf closures, so her pups were safe. I believe her ancestors should have a right to live protected by the federal government.

We need to increase the buffer zone around the park. That's what we need to do. There are many opportunist people in the world who will do whatever they can to make money, including wiping out a wolf pack with a legacy that spans generations. They may say it is in the interest of paying the bills or getting more moose but for many it is hatred of the animal.

I will never forget her face, alive with intelligence as she looked at me before she passed by me and went off hunting for her pups in the Denali twilight. Humans need to leave some places sacred for these animals. We have destroyed too much nature elsewhere.

Please increase the buffer zone.

Amy Holonics  
4721 Newcastle Way  
Anchorage, Alaska  
99503

mother, teacher, former park ranger, Alaska resident for 25 years.

**RECEIVED**

**FEB 12 2010**

**BOARDS  
ANCHORAGE**

I am appalled at the thought of employee/trappers in Alaska's Denali Park taking Toklat wolves by any means.

I am in favor of expanding the buffer zones around Denali park to protect these animals and their offspring.

The wolves are an important part of our wilderness; to them there are no boundaries. They deserve to be protected from their only predator, US.

Pat Huseby  
Virginia, MN

Members of the BOG:

Hundreds of thousands of visitors travel the Park road hoping to see these wolves every year, and 19 percent of these visitors have the great fortune to see or hear these wolves. Some day soon I hope to be one of the lucky 19 percent.

Few individuals would be impacted by an expanded buffer zone. There are only about five trappers targeting these wolves on the Park border.

The trappers who target the Park wolves are extraordinarily successful. Research shows that 30 percent of Park wolf mortality is human caused, i.e. trapping and shooting. This is because the wolves are habituated to human activity and the trappers know exactly where to set their traps.

The proposals seeking to expand the buffer zones are modest, extending the protected zone for wolves by less than ten miles. This is no land grab, because there are many millions of acres of land outside the proposed buffers where wolf trapping and hunting are legal.

For these reasons:

I SUPPORT Proposals 55, 58, 59, 60 and 65 as these proposals seek to expand the current buffer zone adjacent to the Denali National Park boundary.

I OPPOSE Proposals 56, 57, 61, 62, 63, and 64 as these proposals seek to shrink or eliminate the current buffers, thereby allowing trapping right up to the Park boundary.

Additionally, Gordon Haber, a wildlife biologist, spent a lifetime studying Denali's Toklat wolves and was a tireless advocate for expanded buffer zones around the Park. He died in a tragic plane crash while tracking these wolves last fall, and expanded buffer zones would be a fitting memorial.

Thank you,

Nancy Wallace  
1500 Norene St  
Anchorage, AK 99508

**RECEIVED**

**FEB 12 2010**

**BOARDS  
ANCHORAGE**

**Board Of Game**

**I am deeply concerned about the "harvesting" of wolves on any lands, but most especially, on public lands. I am forwarding my concern to many others who travel widely to see animals that live without fear of being destroyed for private interests. I, and they, will join in boycotting travel to Alaska until you stop this activity.**

**Sincerely,  
Michael Banks  
michaelbankswildlifeart.com**

Personal Comment Interior Region--Tad Fujioka

Chairman Judkins and Board of Game:

Proposal 3:

I have trapped in Southeast Alaska for many years, starting in 1989. I am currently the trapping representative on the Sitka Advisory committee as well as the committee chairman. As the Sitka AC generally refrains from submitting comments on proposals that do not have a direct affect on Sitkans, this letter is my own and not the Advisory Committee's.

Proposal 3 would impose a 3 day time limit during which traps and snares must be checked in Unit III. The author references a similar time limit in place in the Gustavus portion of Unit 1C as a model for this proposal. The board should not be misled by this comparison. Having trapped briefly in the Gustavus area, I can assure those Board members not familiar with the Gustavus area that it is quite unique and in particular is very unlike most of Region III. The area is small, none of it more than a few miles from a maintained road. Traplines are short and the area is not subject to extreme (by Interior standards) weather conditions. At the time, inexperienced wolf trappers using snares combined with a very high (unsustainably so as it turned out) moose density resulted in an unacceptable number of moose accidentally being caught in wolf snares. This was the reasoning for imposing the 3 day time limit in the Gustavus area. It was feasible to implement such a time limit in the Gustavus area only because of the above-mentioned unique physical characteristics of the area. With a reduction in the number of moose in the area and a more-experienced trapping community, it is reasonable to revisit the need for the 3 day limit in the Gustavus, than to expand this regulation to other areas.

While there may be some localized exceptions, none of the conditions of the Gustavus area are characteristic of Region III as a whole. In the Interior most trappers are highly experienced and able to prevent excessive accidental catches. Furthermore, Region III is a huge area, most of which is quite remote and difficult to access. Traplines in this region can be vast and travel along them is subject to the prevailing weather conditions. Imposing any sort of mandatory trap check time limit would require trappers to put themselves in jeopardy by mandating travel in dangerous conditions.

Additionally the board should particularly take note of the proposal author's admission under the "Who is Likely to Suffer" section of the proposal in which "The trapping industry as a whole" is listed as a suffering party. The Board of Game should reject this and any proposal which would detrimentally affect the entire industry.



Tad Fujioka

**Holy Cross Tribal Council**  
P.O. Box 89  
Holy Cross, Alaska 99602  
Phone: (907) 476-7124 Fax: (907) 476-7132



February 4, 2010

(Faxed via 907.465.6094)

Board of Game Comments  
ADF&G  
P.O. Box 115526  
Juneau, Alaska 99811-5526

Dear Board of Game:

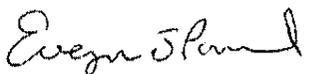
**Proposal 80:** We are in **OPPOSITION** to this proposal because we do not want to see the moose season lengthened for nonresidents in Unit 21E (*Note: In the proposal book it states Unit 21A*). The main reason is because the bull moose with a 50" or higher is the main breeding stock that determines the population. Residents in Unit 21E can now provide for their families with less pressure and not have to worry about guides/nonresidents in every river bend. If nonresidents want to spend XXX amount of money on a guided trip, let them- it does not benefit the local residents.

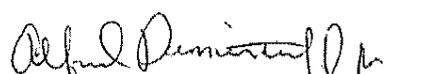
**Proposal 81:** We are in **OPPOSITION** to this proposal because we do not want to see the moose season lengthened for nonresidents in Unit 21E (*Note: In the proposal book it states Unit 21A*). There are many factors that state our reasons, they are: 1) the bull moose with a 50" or higher is the main breeding stock that determines the population, which is why residents hunt the younger moose, 2) there is less pressure on resident hunters from nonresidents, 3) Once a bull moose is in rut, there is no messing with mother nature- the quality of meat is no more good when in the rutting stages so basically it is hunting just for the horns, 4) The local guide(s) and/or nonresident hunters do not contribute to any local businesses in Holy Cross (gas is purchased thru the barge carrier(s) and groceries are purchased elsewhere) and lastly 5) the local guide(s) and/or nonresidents do not contribute meat to any local residents and/or social service agencies.

Thank you for considering our opposition.

Respectfully,

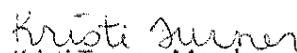
Holy Cross Village

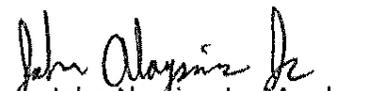
  
Eugene J. Paul, First Chief

  
Alfred Demientieff, Jr., Second Chief

  
Darlene Aloysius, Sec./Treasurer

LeAnn Samuelson, Member

  
Kristi Turner, Member

  
John Aloysius, Jr., Member

  
Ronnie Turner, Member



Attn: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
POB 115526  
Juneau, Alaska 99811-5526

As a long time hunter (45 years) of the Forty Mile Caribou herd, I would like to see all proposals for the Forty Mile caribou rejected. If a parent wants to take a child hunting in that area, take them, I see no reason for a special season. The area that the caribou roam is tough country, if made non-motorized, harvesting caribou would be difficult. If you want to help the Forty Mile Caribou herd, Fish and Game needs to stop telling all hunters where to find caribou and giving directions to trails that access the areas. There should only be one permit per household; with a limited amount of permits, why does a household need more than one caribou? This should also be a "resident only" hunt; the animals belong to the residents of Alaska and because there are a limited number of animals allowed to be taken, they should go to Alaskan residents only. Thank you for your time and I hope you will consider my recommendations.

Sincerely,



David Lester  
Fairbanks, Alaska



## Alaska Outdoor Council

310 K Street, Suite 200  
Anchorage, Alaska 99501  
Phone: (907) 264-6645 Fax: (907) 264-6602  
e-mail: aoc@alaskaoutdoorcouncil.org  
web: www.alaskaoutdoorcouncil.org

February 13, 2010

### **Board of Directors**

#### ***President***

Bill Iverson  
Soldotna

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Rod Arno  
Palmer

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

Dear people,

I would like to comment on BOG Interior Region Proposal 14.

I would support Proposal 14 if the opening date were changed to the 17<sup>th</sup> of August instead of the 29<sup>th</sup> of August. I would prefer to see the date left alone completely but a compromise would be acceptable. Secondly changing it to a bull only area will not change anything as most try to take a bull in the first place. This will go back to the old problems of misidentifying some cows for bulls and making criminals out of mistakes, which is why the hunt was changed to a any caribou hunt. The reasons were good for doing it then are still good now.

My reasons are:

1. Better tasting meat.
  - a. My subsistence lifestyle is supplemented with this caribou. It is sweet tasting. Later in the season it takes on a gamey livery tasting meat which I find offensive.
2. The chance of being snowed in is much higher.
  - a. Even with the date on the 10<sup>th</sup> there is a chance of snow. Last year it snowed the day we left the field, August 11th.
3. Harder for Protection Officers to do their job as moose season is now open.
4. The argument that early hunt season closures are bad doesn't fly.
  - a. Emergency Closures are not a problem, for us doing the hunting, as we go in knowing it may happen.
  - b. The purpose is still served and the allotted caribou still end up in our freezers. Whether they are taken in the first 4 days of over the full month, it has the same effect (meat for Alaskans).
  - c. It is the fairest hunt in Alaska. Anyone can participate. I have been doing this hunt for years and it currently works great. You show up, register for your permit, and wait for opening day, when the allotted

- d. caribou are harvested the season ends. It is equal access to all with no discrimination to anyone, unlike the Nelchina hunt which is totally wrong and has been for years. With each tweak it gets worse.
  - e. I do think it should go back to the registration must be done in Tok, not online but can be done at any time prior to going hunting. That way people aren't just registering and not showing up. This over inflates the number of users.
  - f. Having the date on the 10th of August was good because it allows us to schedule our time so we can participate in this hunt and then move onto our Moose hunting. I am a subsistence hunter in every sense of the word but I use regular Game management rules to accomplish this. I live off of the fish I catch, the Caribou and Moose I hunt. I was born and raised on this in Alaska. I have entered into every drawing permit, in the areas I hunt, since I could and have NEVER won one yet. Under drawing permit systems I would have to give up my lifelong food source.
  - g. My health would be greatly affected. I am very healthy and hardly ever get sick, for now. It has been proven that Moose is great for cholesterol reduction. I haven't seen a similar study done on Caribou yet but I bet it is the same.
  - h. Example:
    - 1. Under the Tier 1 in Nelchina hunt, if I even got a permit, I cannot hunt anywhere else, even if I am unsuccessful. I can't even hunt for my Moose elsewhere. My family can't survive on just one Caribou. If you are lucky you might get 70lbs meat from a large caribou, boned out. Then I can't hunt for another 4 years, though I must still pay the permit application fee to stay on the rolls. Totally unreasonable system for a subsistence hunt. Where does my nutrition come from then (beef , yuk)?
5. Final point is that all this worry is mostly based on last year's fantastic hunt. It was an anomaly that will be many years before we see these conditions again. I have not seen this many bulls in one area together since I started hunting 20E.

Bill Iverson

  
President

Alaska Outdoor Council

Email: [president@alaskaoutdoorcouncil.org](mailto:president@alaskaoutdoorcouncil.org)



12 February 2010  
PO Box 222  
Healy, AK 99743

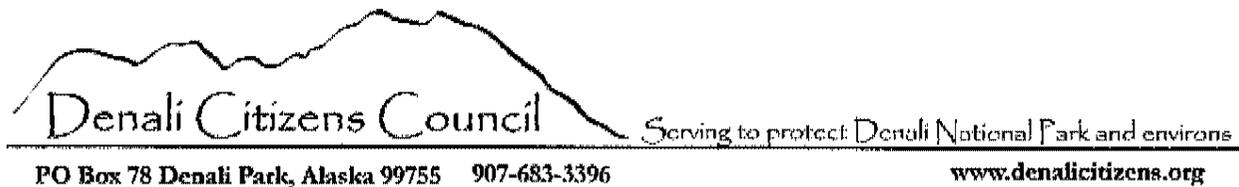
Alaska Department of Fish and Game  
Board Support Section  
PO Box 115526  
Juneau, AK 99811-5526

Dear Members of the Board of Game:

I support retaining and expanding the wolf hunting/trapping buffer zones around Denali National Park. I am for maximum protection of the wolves in the Wolf Townships and other areas adjacent to the park so that park wolf packs can retain their integrity and so be useful for scientific study.

I hope you will retain the buffer zones, and expand them.

Sincerely,  
Susan S. Braum  
Susan S. Braum



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

February 12, 2010

RE: Proposal 55

Mr. Chairman and Members of the Board,

On behalf of the Board and members of the Denali Citizens Council, I encourage you to pass Proposal 55, submitted by the Denali Citizens Council (DCC). This proposal would retain the Nenana Canyon closed area and the Stampede Closed Areas, currently closed to the taking of wolves, and add to them the entire wolf townships east of the Savage River as far as the Nenana River. Trapping of coyotes would be closed to prevent accidental take. A map of this proposed area appears at the end of this letter.

DCC, founded in 1974 in Cantwell, is a grassroots public education and advocacy organization with an office in the Denali Borough. Over half of our nearly 400 members are Alaskans and many either live in proximity to Denali National Park or have lived and worked there through the years. Our members support careful management of public resources in the area of the Park in order to guarantee continued quality of life for themselves and their families. The Denali Citizens Council is not a national park "friends" organization and although we support the goals of Denali National Park, we have no direct relationship with national park administration.

For almost two decades, our members have supported enhanced protection for wolf packs whose main territories exist within the boundaries of Denali National Park, when they venture into certain key areas outside the park. These key areas are located along the northern and eastern boundaries of the park. The Alaska Board of Game has recognized this issue too, and since the early 1990s has established closed areas, or "buffer zones", with the goal of providing enhanced protection for wolves. Data now show that current buffers on the northern-eastern boundaries of the park are insufficient to appropriately protect this resource.

---

**DCC Board**

Nancy Bale  
 Anne Beauclair  
 Jean Balay  
 Cass Ray

Hannah Ragland  
 Nan Eagleson  
 Jared Zimmerman  
 Charlie Loeb

Julia Potter, Community Organizer

A great deal of data has been gathered through telemetry of collared wolves. Collar frequencies not only provide location data, but identify individual wolves from individual packs. Both the National Park Service and independent wolf biologist Gordon Haber have gathered and compiled this data over the past two decades. It unequivocally shows a preference for certain key habitats outside the park by several of the most viewed and researched packs in the world.

Our arguments in favor of retaining and increasing the extent of current closed areas are given within Proposal 55, on pp. 75-77 in the Proposal booklet. They are summarized below.

**We urge you to pass Proposal 55 for the following reasons:**

1. The State of Alaska and the Alaska Board of Game have a vested interest in maintaining the integrity of wolf groups whose home territories are located within Denali National Park. Why? Several reasons;
  - a. Wolves are important to the tourism economy of the region. Hundreds of thousands of people visit Denali National Park every summer with expectation of viewing wolves in their natural habitat. The eastern-most section of the park, between the entrance area and the Teklanika River, has the greatest amount of tourist visitation, and its wolf packs have in the past and are now most vulnerable to trapping outside the park.
  - b. The wolf resource has additional value as a subject of long-term research. The Toklat-East Fork Pack has been studied since the days of Adolph Murie 70 years ago. The behavioral integrity of park wolf groups is placed at risk when adult wolves and/or several members of the same group are trapped.
  - c. The State of Alaska signed an MOU with the National Park Service in 1982 in which the State recognized the Service's mandate to manage for "natural and healthy" populations of animals. The two agencies agreed to coordinate and consult. The state lands at the border of Denali for whom we recommend enhanced protection are unique in their importance as winter habitat for Denali wolves, which are managed mainly as a natural and healthy species.
2. The wolf resource is consistently at risk year to year in the eastern wolf townships outside the existing buffer zone.
  - a. Wolves from at least five packs inside Denali have seasonal forays into lands in the eastern wolf townships (East of the Savage River). Telemetry over several years shows this regular pattern of out-migration into the Stampede lands in winter.

- b. Wolf researcher Gordon Haber, in a paper entitled "Wolf Foraging and Related Social Variations in Denali National Park," (2007) demonstrated the reliance of certain packs from within Denali National Park upon winter migrations into the wolf townships. This should not be viewed as a casual, occasional spill-over, but instead a consistent pattern that confers special vulnerability on state lands outside the park in winter. Dr. Haber's complete paper is available in pdf form in *Alaska Park Science, Crossing Boundaries in a Changing Environment, Sept 2006* at <http://www.nps.gov/akso/AKParkScience/symposium2006/haber.pdf>
  - c. Wolf numbers have declined to a recent low of 65 individuals in Denali National Park. Add to this, recent data taken and analyzed by NPS showed that the role of human-caused mortality in death of park wolves has increased.
  - d. Nearness to a major transportation corridor makes it relatively easy for trappers to access just those areas where the wolves from Denali are most vulnerable on state lands.
  - e. Denali wolves currently are not lice infested and continued mortality at the boundaries could encourage in-migration of the lice problem from wolves outside the park.
3. Public citizens at the gateway to Denali National Park, statewide and nationwide support buffer zones.
- a. DCC has circulated an informal petition advocating retention and expansion of wolf buffers and have gained over 400 signatures, over 250 of them from Alaskans and over 70 of those from zip codes within the Denali Borough. Signatures continue to accumulate.
  - b. The public in residential areas both around Healy and along the Nenana Canyon have a public safety interest in no wolf hunting-trapping zones near their homes. Concerns for public safety have already been expressed before the Middle Nenana Fish and Game Advisory Committee and the Denali Borough Assembly.
  - c. DCC does not oppose trapping and hunting and our proposal would not prohibit trapping of other furbearers in the buffer zones advocated. Many of our members are rural residents who enjoy recreation and hunting in the area, but understand and support the resource protection and public safety motivations behind Proposal 55.
  - d. "Buffer zones" are a legitimate management and policy tool. Proposal 87, before you at this meeting, asks that the BOG regulate activities on state lands outside a National Wildlife Refuge to promote the purposes of the Refuge.

Sincerely,

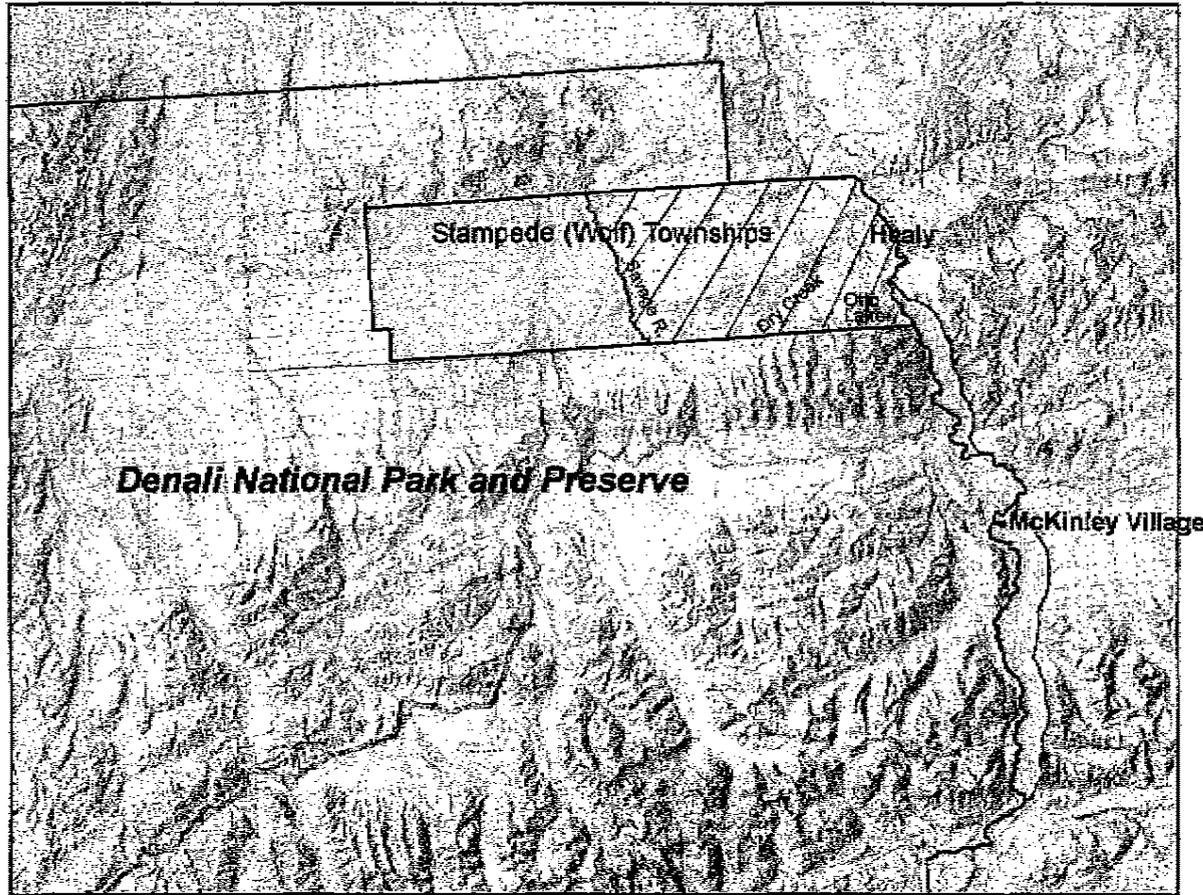


Nancy Bale

President, Denali Citizens Council

Attachment: Map of Proposal 55 on next page

**MAP OF PROPOSAL 55 FOR AREAS CLOSED TO THE TAKING OF WOLVES NEAR DENALI NATIONAL PARK**



*Map showing existing Stampede and Nenana Canyon areas closed to the taking of wolves, shown shaded. Proposal 55 would continue these closures and would add to them the area shown in cross-hatches. The western boundary of this additional closed area would be the Savage River. The eastern boundary would be the Nenana River. The southern boundary would be Denali National Park. The northern boundary would be Denali National Park and then a line at 63 degrees, 54.6 minutes N. latitude continuing on to the Nenana River.*

**Denali Citizens Council, 2010**

**COMMENTS ON REGION III BOARD OF GAME PROPOSALS FOR 2010****PROPOSAL #16 I SUPPORT**

The Proposal is good because it gives resident hunters a chance to harvest an Alaskan resource for a short time without competing with non-residents that have an advantage of greater financial resources. For example, guides with client dollars are able to go out before the hunting season and set up camps that establish first use of a hunting area. Also, non-resident hunters enjoy an approximate 70% success rate where Alaskan residents have about a 25% success rate. The current regulations DO give an advantage to non-residents sheep hunters over resident sheep hunters without expressly saying it.

The teachers and most of the staff for Fairbanks North Star Borough School District start school on the 10<sup>th</sup> of August. Anchorage School District starts school for teachers and staff on August 13<sup>th</sup>. Employees are not allowed to take time off during the first week and the second week is the first week with students. What it means is that a large group of Alaskans and their families are unable to hunt sheep at the beginning of the season. Since I became a teacher 15 years ago, I have not been able to hunt sheep the first four weeks of the season. An early hunt for residents would open the opportunity to hundreds of Alaskans.

I would very much like to see the BOG adopt regulations that would give Alaskan residents, and not non-residents, preference over an Alaskan resource.

**Proposal #70 I OPPOSE**

I have hunted the Wood River Controlled Use Area two times in the past three years. I know the canyon as the river travels through the Alaskan Range. I see many hunters that fly into camps and many that raft down the river. It seems crowded to me already and it is one of the few places that interior hunters can see true wilderness land without the sound pollution and the eroding of the river banks by ATVs. I have walked on the winter trail that ATVs would use in the fall and I can tell you from my experience that this trail will become a mud bog and also place unnecessary pressure on the moose population that would drive them further back into the mountains.

Sincerely,



Steven Pankhurst  
760 High Grade Way  
Fairbanks, AK 99712

**Alaska Professional Hunters Association Inc.**  
HC 60 Box 299C Copper Center, Alaska 99573  
(907) 822-3755

February 11, 2010

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

SPRING 2010 BOARD OF GAME WRITTEN COMMENTS

Dear Alaska Board of Game Members,

Please find the following comments for your consideration regarding proposals you will be addressing at your Region III, 2010 meeting in Fairbanks.

**PROPOSALS THAT APHA OPPOSES:** 6, 13, 15, 16, 21, 23, 24, 28, 29, 30, 45, 46, 55, 58, 59, 60, 65, 67, 69, 70, 75, 97, 98, 129

**PROPOSALS THAT APHA SUPPORTS:** 11, 12, 18, 56, 57, 61, 62, 63, 64, 66, 78, 80, 81, 84, 85, 86, 93, 99, 104, 130, 131

**PROPOSALS THAT APHA SUPPORTS WITH AMMENDMENT:** 27, 31

**PROPOSAL COMMENTS**

**PROPOSAL 6, OPPOSE:** It is important to note that there have been numerous dynamics that have been implemented on this *road to recovery* so to speak regarding our wildlife conservation enhancement and Intensive/Predator Management programs. What we do know is that these dynamics are working and have stood the test of legal challenge and public acceptance.

As Alaska's wildland habitats vary substantially in relation to flora characteristics it is important to note that naturally, some regions will respond faster to management initiatives than others. Canopied regions will naturally respond slower than sparser habitats. APHA urges caution in going to far to fast in initiating methodologies that may jeopardize the whole of the existing programs.

*Alaska Professional Hunters Association Inc.*

**PROPOSAL 11, SUPPORT:** APIIA supports the concept of this proposal but encourages the Board and the Department to try and be as consistent as possible statewide with these type of regulations.

**PROPOSAL 12, SUPPORT:**

**PROPOSAL 13, OPPOSE:**

**PROPOSAL 15, OPPOSE:**

**PROPOSAL 16, OPPOSE:** This proposal will not eliminate conflict in the field concerns as proposed, if fact it will raise conflict. Long established guide service providers will be displaced by air-taxi and transporter services.

This proposal adds additional conservation concerns to a challenged resource. In many areas within Region III, long time APHA member service providers have never seen a resident hunter. Seasons dates should be the same for residents and non-residents. This proposal's suggested merit and reasoning would pit any hunting area for any specie on uncommon ground for resident and nonresident hunters and would lead down the path of eliminating a great and sustainable industry.

Within existing hunting and guide regulations there are several laws that address conflict in the field and protect the best interest of all hunters.

This proposal would suggest and require that our members who operate within this region would have to sit in their long established camps and watch resident hunters and air-taxi operators have early access to the resource when the non-resident hunter is currently paying over 425 times more than the resident for the same privilege. Additionally, the nonresident funding is vital to wildlife conservation needs within Alaska and needs to be respected.

If the BOG passes this proposal it will if fact penalize and break the back economically of many of our members who have dedicated their actions as professional guides to provide for resident hunters within their guiding programs. This is an important consideration in relation to the need for economy within rural Alaska. Many of our members hire and spend locally within their hunt regions and their industry provides the best interest of our constitutional mandate of achieving maximum benefit from the harvest of Alaska's resources.

**PROPOSAL 18, SUPPORT:** Based on its given merit.

**PROPOSAL 21, OPPOSE:** APIIA opposes development of special hunts in general as we feel that the regular season dates and means of methods provide the best balance and the best interest for all hunters.

**PROPOSAL 23, OPPOSE:** The data does not reflect that there is a long term concern related to the old age class of rams. A five year or ten year trend would be better than micro-management when the lost allocation is often hard to get back.

**PROPOSAL 24, OPPOSE:**

**PROPOSAL 27, 31, SUPPORT WITH AMMENDMENT:** APHA would support this proposal with a Sept. 1 to June 15 season date.

**PROPOSAL 28, 29, 30, OPPOSE:** It is important to note that there have been numerous dynamics that have been implemented on this *road to recovery* so to speak regarding our wildlife conservation enhancement and Intensive/Predator Management programs. What we do know is that these dynamics are working and have stood the test of legal challenge and public acceptance.

As Alaska's wildland habitats vary substantially in relation to flora characteristics it is important to note that naturally, some regions will respond faster to management initiatives than others. Canopied regions will naturally respond slower than sparser habitats. APHA urges caution in going to far to fast in initiating methodologies that may jeopardize the whole of the existing programs.

**PROPOSAL 45, OPPOSE:** Prefer Status Quo

**PROPOSAL 46, OPPOSE:** Ample opportunity already exists.

**PROPOSAL 55, 58, 59, 60, 65, OPPOSE:** APHA asks for your support in sustaining and developing expansion of management programs intended to grant relief to predator and prey imbalances. This needed action is becoming much more pronounced in relation to developing biological emergency situations. We have grave concerns about wildlife populations that are becoming endangered due to predator prey imbalances, primarily by wolf predation. Tourist enjoy seeing all wildlife, not just wolves. In most of the road system in Alaska game populations are at low densities and viewable wildlife is minimal. Management for the whole which include predator control provides for the best interest of all people who enjoy and depend upon prudent wildlife populations.

**PROPOSAL 56, 57, 61, 62, 63, 64, 66 SUPPORT:** Based on their given merits and APHA asks for your support in sustaining and developing expansion of management programs intended to grant relief to predator and prey imbalances. This needed action is becoming much more pronounced in relation to developing biological emergency and low density equilibrium situations. We have grave concerns about wildlife populations that are becoming endangered due to predator prey imbalances, primarily by wolf predation. Tourists enjoy seeing all wildlife, not just wolves. In most of the road system in Alaska, game populations are at low densities and viewable wildlife is minimal. Management for the whole, which includes predator control provides for the best interest of all people who enjoy and depend upon prudent wildlife management.

**PROPOSAL 67, OPPOSE:** It is important to note that there have been numerous dynamics that have been implemented on this *road to recovery* so to speak regarding our wildlife conservation enhancement and Intensive/Predator Management programs. What we do know is that these dynamics are working and have stood the test of legal challenge and public acceptance.

As Alaska's wildland habitats vary substantially in relation to flora characteristics it is important to note that naturally, some regions will respond faster to management initiatives than others. Canopied regions will naturally respond slower than sparser habitats. APHA urges caution in going too far too fast in initiating methodologies that may jeopardize the whole of the existing programs.

**PROPOSAL 69, 70 OPPOSE:** Prefer status quo of one of the oldest and most successful controlled use areas in the state.

**PROPOSAL 75, OPPOSE:** APHA opposes same day airborne hunting for big game animals in general and always fears that when you make it available in one instance for certain considerations it will expand into others with similar considerations. The age old problem of allowing for spotting of game from the air then comes back to work against hunters' best interest and sound conservation.

**PROPOSAL 78, SUPPORT:** Based on its given merits.

**PROPOSAL 80, 81, SUPPORT:** Based on their given merits.

**PROPOSAL 84, 85, 86 SUPPORT:** APHA asks for your support in developing expansion of management programs intended to grant relief to predator and prey imbalances.

APHA feels that it is very important that you consider the whole of the achievements that have been made and what the benefits have been to our wildlife in existing predator management regions. It is important to note that there have been numerous dynamics that have been implemented on this *road to recovery* so to speak regarding our wildlife conservation enhancement and Intensive/Predator Management programs. What we do know is that these dynamics are working and have stood the test of legal challenge and public acceptance.

As Alaska's wildland habitats vary substantially in relation to flora characteristics it is important to note that naturally, some regions will respond faster to management initiatives than others. Canopied regions will naturally respond slower than sparser habitats. APHA urges caution in going too far too fast in initiating methodologies that may jeopardize the whole of the existing programs.

**PROPOSAL 93, SUPPORT:** Based on its given merits.

**PROPOSAL 97, 98 OPPOSE:** APHA urges caution in going too far too fast in initiating methodologies that may jeopardize the whole of the existing management programs.

*Alaska Professional Hunters Association Inc.*

**PROPOSAL 99, SUPPORT:** Based on its given merit.

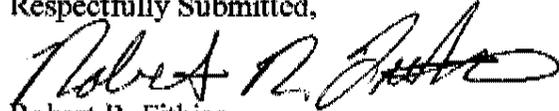
**PRPOSAL 104, SUPPORT:** Based on its given merits.

**PRPOSAL 129, OPPOSE:** APHA urges caution in going to far to fast in initiating methodologies that may jeopardize the whole of the existing management programs.

**PRPOSAL 130, SUPPORT:** Based on its given merit.

**PRPOSAL 131, SUPPORT:** APIIA asks for your support in developing expansion of management programs intended to grant relief to predator and prey imbalances. This needed action is becoming much more pronounced in relation to developing biological emergency situations. We have grave concerns about threatened wildlife populations that without effective and timely assistance, may become extinct. Primary in these type cases at present are the Mentasta and Unimak caribou populations. Please do all you can to help keep biological emergencies such as these from occurring.

Respectfully Submitted,



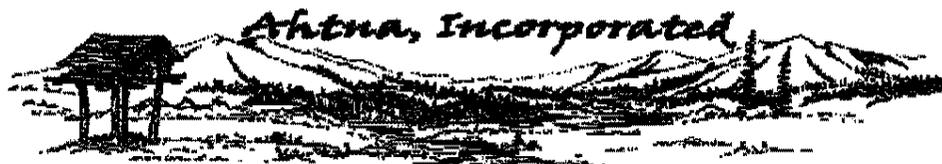
Robert R. Fithian  
Executive Director

**To: Alaska Board of Game, Juneau, AK, re Wolf Buffer Zones.**

It seems the least the Board could do in the near aftermath of Gordon Haber's death, after a lifetime of fighting for wolf protection of individuals and social groups, would be to expand the buffer zones that protect the wolves in the Denali region. Please consider the utmost buffers as your preferred decision on this issue.

William E. Brown  
Box 225  
Gustavus, AK 99826

907 697 2778



February 12, 2010

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Alaska Dept. of Fish & Game  
 Boards Support Section  
 Sherry Wright  
 333 Raspberry Rd.  
 Anchorage, AK 99518-1599

*Attn: Scott*  
*BOG Interior Region*  
*Comments*

To the Board of Game:

Enclosed are the Ahtna Tene Nene' Customary & Traditional Use Committee's comments on wildlife and trapping proposals for the Interior Region meeting in Fairbanks, Alaska.

Please read and support our comments, during deliberations.

Sincerely,  
*Gloria Stekwan*  
*for*  
*Eleanor Dementi*  
 Eleanor Dementi,  
 Chair

**Proposal 2 – 5 AAC 84.270. Furbearer trapping. Modify the trapping season for lynx in Units 20 and 25C as follows: By Allen Barrette.**

Lynx season should be December 1 – February 28. If you can legally make language to allow for incidental catch before and after these dates so be it. If not, go back to the prior regulation that if you harvest an out of season furbearer you release it if applicable or skin it and surrender it to the State of Alaska.

**Comments:**

We support a lynx season of December 1 to February 28, so that lynx will not be caught in traps during the month of November. Trapping lynx later in the season would be better for everyone who is a trapper.

**Proposal 3 – 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions. Require trappers to check traps in all Region III as follows:**

A requirement for trappers to check their traps within a 72 hour time period in the Interior Region of Alaska. The regulation would stipulate that a trapper must check dry land traps at least once with a 72 hour period of time after setting them, and remove any captured animal from the set. It could read similar to the Unit 1C regulation which states that “all traps/snares must be checked within three days of setting them and within each three days thereafter”.

**Comments:**

We oppose Proposal 3 that states trappers must check their traps within 72 hours. It would be unenforceable, and put a burden on trappers having to check traps within 3 days. It would be dangerous for trappers to check snares if it was -50° for 3 consecutive days.

**Proposal 4 – 5 AAC Hunting seasons and bag limits for small game. By Brent Keith.**

Unit 20: Ten coyotes per day... no closed season [August 10-April 30].

**Comments:**

We opposed Proposal 4 that states no closed season [August 10-April 30] for coyotes. There may be an abundance of coyote, but to state no close season, could jeopardize the population of coyotes.

**Proposal 6- 5 AAC 92.990(7)(C) (iv). Definitions; and 92.200. Purchase and sale of game. By Eastern Interior Regional Alaska Subsistence Regional Advisory Council.**

Reclassify black bear to allow trapping and the sale of hides in Units 25, 20 and 12 as follows:

Declare the black bear a furbearer under statewide regulations for Units 25, 20 and 12.

**Comments:**

We oppose Proposal 6 to declare black bear a furbearer in Unit 12 and Unit 20A. There is a hunting season for black bear, so that people can harvest black bears.

**Proposal 7 – 5 AAC 92.0044. Permit for hunting black bear with the use of bait or scent lures. By Don Duncan.**

Change the black bear baiting season for Units 12, 19, 20, 21, 24, and 25 as follows:

Black bear baiting season is April 1 or March 25<sup>th</sup> – June 30.

**Comments:**

We are neutral on Proposal 7 to change the black bear baiting season to an earlier baiting season.

**Proposal 8 – 5 AAC 92.0044. Permit for hunting black bear with the use of bait or scent lures. By Don Duncan.**

Allow guides and assistant guides to maintain bait station for clients for Units 12, 19, 20, 21, 24 and 25 as follows:

There should be an exception for guides as follows: except a registered guide who is licensed for the Unit and has picked the guide use area may register a contracted client's bait station and may establish, maintain and remove the bait on behalf of the client. When the guide is registering a client's bait station permit; the guide must show proof of the client contract, a copy of the client's hunting license and big game tag if needed and proof of bear baiting class for both the client and guide if required. The guide would be legally responsible for the bait in addition to the client.

**Comments:**

We are neutral on Proposal 8 to allow guides and assistant guides to maintain bait stations for clients in Unit 12 and Unit 20.

**Proposal 9 – 5 AAC 92.0044. Permit for hunting black bear with the use of bait or scent lures. By Don Duncan.**

Allow guides to maintain up to ten bait stations for Units 12, 19, 20, 21, 24 and 25 as follows:

The regulation should read....except a registered guide who is license for the area and has currently picked the area can get up to ten black bear bait permits.

**Comments:**

We are neutral on Proposal 9 to allow guides to maintain up to 10 bait stations in Unit 12 and Unit 20 as well as those listed in the proposal as written.

**Proposal 10 – 5 AAC 92.220(a)(4). Salvage of game meat, furs, and hides. By Vince Holton.**

Modify the salvage requirements for black bear in Unit 20 as follows:

From January 1 – May 31, in Units 1 – 7, 11 – 17, and 20 the hide, skull and meat must be salvaged and removed from the field.

From June 1 – December 31, the skull and either the hide, or meat or both [the hide and skull] must be salvaged and removed from the field in Unit 20. Edible meat as defined by 5 AAC 92.999.

**Comments:**

We oppose Proposal 10 to modify salvage requirements for black bear in Unit 20 to have the skull and either the hide or meat or both salvaged and removed from the field in Unit 20. The hide and meat should be salvaged and hauled in by the hunters.

**Proposal 11 – 5 AAC 92.165. Sealing of bear skins and skulls. By Alaska Dept. of Fish & Game.**

Eliminate black bear sealing in Interior Game Management Units where harvest tickets or registration permits provide necessary harvest data as follows:

- (a) Sealing is required for brown bear taken in any unit in the state, black bear of any color variation taken in Units 1 -7, 11, 13,-17, and 20B [11 – 17, 19(D) and 20], and a bear skin or skull before the skin or hide is sold. A seal must remain on the skin until the tanning process has commenced. A person may not possess or transport the untanned skin or skull of a bear taken in a unit where sealing is required, or export from the state the untanned skin or skull of a bear taken anywhere in the state, unless the skin and skull have been sealed by a department representative within 30 days after the taking. Or a lesser time if requested by the department, except that

[(4) IN UNIT 19(D), BLACK BEAR TAKEN IN UNIT 19(D) OUTSIDE OF THE WOLF PREDATION CONTROL AREA DESCRIBED IN 5 AAC 92.125(F) IS NOT REQUIRED TO BE SEALED; HOWEVER, THE HIDE OF A BLACK BEAR TAKEN FROM JANUARY 1 THROUGH MAY BE NOT BE TRANSPORTED FROM UNIT 9 UNTIL SEALED;]

- (b) A person who possesses a bear taken in a unit where sealing is required shall keep the skin and skull together until a department representative has removed a rudimentary premolar tooth from the skull and sealed both the skull and the skin. The department may require that the skull of the bear be skinned and that the skin and skull not be frozen at the time of sealing.

**Comments:**

We support Proposal 11 to “eliminate black bear sealing in Interior Game Management Units where harvest tickets or registration permits provide necessary harvest data”. If this is only the biological data needed by ADF&G, then we agree with the change to black bear sealing requirements.

**Proposal 12 – 5 AAC 92.015. Brown bear tag fee exemptions. By Alaska Department of Fish and Game.**

Authorize new resident brown bear tag fee exemptions throughout Interior and Eastern Arctic Alaska, including reauthorization of current resident tag fee exemptions as follows:

- (a) A resident tag is not required for taking a brown bear in the following units:  
 (4) Units 12, 19, 20, 21, 24, 25, 26B and 26C [UNIT 19(A) AND UNIT 19(D);]  
 [(5) UNIT 20(D)]  
 [(6) UNIT 20(E), THAT PORTION OUSIDE OF YUKON-CHARLEY RIVERS NATIONAL PRESERVES;]  
 [(7) UNIT 21(B), UNIT 21(D), AND UNIT 21(E);]  
 [(101) UNIT 25 (C) AND UNIT 25(D).]
- (b) In addition to the units as specified in (a) of this section, if a hunter obtains a subsistence registration permit before hunting, that hunter is not required to obtain tag to take a brown bear in the following units;

[(5) UNITS 19(A) AND 19(B), THAT PORTION OF DOWNSTREAM OF AND INCLUDING THE ANIAK RIVER DRAINAGE;]

[(19) UNIT 24;]

**Comments:**

We support Proposal 12 exemption of tag fee for taking of brown bear in Unit 12 and Unit 20 and other units as stated in the proposal by ADF&G. Resident hunters should not have to pay \$25 dollars for tag fees to take a bear.

**Proposal 16 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. By Tom Lamal.**

Modify season dates for Dall sheep for all Region III Units as follows:

Dall sheep season:

Residents – August 5-September 20

Nonresidents-August 12 – September 20

**Comments:**

We are neutral on Proposal 16 to modify season dates for Dall sheep for all of Region III for Residents and Nonresidents.

**Proposal 17 – 5 AAC 84.270. Furbearer Trapping. By Upper Tanana Fortymile Fish and Game Advisory Committee.**

Change the season dates for trapping lynx in Units 12 and 20E as follows:

Close the November portion of the lynx season in Units 12 and 20E. Extend the closing date for lynx trapping in the Units 12 and 20E from March 15 to March 31.

**Comments:**

We support Proposal 17 to allow a later trapping season for lynx in Unit 12 to either February 28 or March 31<sup>st</sup>, so that trappers will not harvest them during the month of November.

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**Proposal 18 – 5 AAC 85.025. Hunting seasons and bag limits for caribou. By Upper Tanana Fortymile Fish and Game Advisory Committee.**

Open a fall hunting season for the Chisana Caribou Herd in Unit 121 as follows:

Establish a joint federal/state draw permit hunt for the Chisana Caribou Herd starting the fall of 2011. This draw permit hunt should be structured similar to the Cordova moose draw permit hunt, with a portion of the permits issued to federally qualified subsistence hunters, under federal regulations (federal hunt) and the rest of the permits issued to Alaska residents and nonresidents, under state regulations (state hunt).

**Comments:**

We adamantly oppose Proposal 18 to “establish a joint federal/state draw permit hunt for the Chisana Caribou Herd beginning the fall of 2011. The two management regimes should not have an aligned hunting season for caribou. A federal hunt should have separate hunting regulations that are more liberal than the state, and comply with ANILCA.

**Proposal 23 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. By Upper Tanana Fortymile Fish and Game Advisory Committee.**

Reduce the number of permits for the Tok Management area for Dall Sheep in Units 12 and 20 as follows:

Reducing the number of permits is the simplest solution. The seasons and bag limit regulations would not change, but the number of permits would be reduced to 80 issued instead of 100. The 20-permit reduction is intended as a temporary regulation. When the sheep’s numbers rebound to higher levels, the number of permits would be increased.

**Comments:**

We support reducing the Unit 12 - Dall Sheep permits from 100 to 80, so that Dall Sheep may increase in population.

**Proposal 24 – 5 AAC 92.125(b). Predation control areas implementation plans. By Anchorage Fish & Game Advisory Committee.**

Restrict nonresident hunting for moose and caribou in the Upper Yukon/Tanana Predation Control Area in Units 12 and 20 as follows:

Add the following language to 5 AAC92.125(b):

**...within the UYTPCA active predator control area, defined by the current intensive management plan, nonresident hunting will not be authorized for moose or caribou populations with a positive customary and traditional use finding when:**

**A: the most current population estimate for moose or caribou is below the minimum population objective and/or the bull:cow ratio for that species as defined in 5 AAC 92. 108 or the intensive management plan....**

**Comments:**

We support Proposal 24 to "eliminate nonresident hunting for certain big game animals in predation control areas", in areas where there is a positive C&T finding. Nonresidents should not be allowed to compete with subsistence uses over the resources, especially during the hunting season.

**Proposal 27 – 5 AAC 85.020(18). Hunting Seasons and bag limits for brown bear. By Delta Advisory Committee.**

Lengthen the brown bear season in Unit 20A as follows:

Brown/grizzly bear season is open in Unit 20A between June 30 and August 10.

**Comments:**

We oppose Proposal.27 as it is written. We support Division of Wildlife Conservation's amendment to recommend a season date of Sept.1-May 31, which would correspond with the general moose season. Hunters could take a moose and Brown/grizzly bear while out in the field.

**Proposal 28 – 5 AAC 85.020. Hunting Seasons and bag limits for brown bear; and 92.XXX. Permit for hunting brown bear with the use of bait or scent lures. By Lee Olsen.**

Allow the taking of brown bear over bait in areas in Unit 20 as follows:

Provide a regulation for taking grizzlies over bait as we do for black bears. Two years ago it started at my bear baits with one grizzly. Last summer I had four different grizzlies and with all the cow moose being killed off and no predator control plan going on in these areas we need to do something. I believe they are hunting the black bears around my bait for something to eat, since there are not that many calves in these areas any more.

**Comments:**

We oppose baiting for brown bears in Unit 20; it is too dangerous to bait brown bears. There are hunting season for brown bears in Unit 20.

**Proposal 31 – 5 AAC 85.020. Hunting Seasons and bag limits for brown bear; By Vince Holten.**

Expand the brown bear season dates for Units 20C and 20A as follows:

Unit 20A, one bear every regulatory year September 1 [5] through June 30 [May 31]  
OR (preferably)

Unit 20A, one bear every regulatory year August 10 – [September 5] – June 30  
[May 31]

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**Comments:**

We support the Division of Wildlife Conservation's proposed amendment to Proposal 31 to expand the brown bear season dates for Unit 20A, which is Sept. 1-May 31, so that there will more opportunity to harvest brown bears.

**Proposal 32 – 5 AAC 85.045. Hunting seasons and bag limits for moose. By Lee Olsen.**

Modify the antler restriction for moose in Unit 20A as follows:

Change the hunt for bulls to 36 inches and two brow tines; no bulls under 36 inches shall be taken.

**Comments:**

We support Proposal 32 to allow a more liberal season for Unit 20A Moose. Changing 1 bull with spike-fork antlers or 50-inch antlers or antlers with 4 or more brow tines on one side to 36 inches and two brow tines would allow more opportunity to harvest a moose in Unit 20A.

**Proposal 33 – 5 AAC 85.045. Hunting seasons and bag limits for moose. By Valerie Baxter.**

Allow the taking of moose calves in Unit 20 as follows:

Change the legal animal in antlerless hunts. Where appropriate for Unit 20 antlerless hunts: One antlerless moose by permit [HOWEVER, NO PERSON MAY TAKE A CALF OR A COW ACCOMPANIED BY A CALF.]

**Comments:**

We oppose Proposal 33 to allow the taking of moose calves in Unit 20A. Allowing this would be detrimental to the moose population, if calves were killed and harvested. It is against our customary and tradition to hunt cows with calves.

**Proposal 34 – 5 AAC 85.045. Hunting seasons and bag limits for moose. By Larry Kappel.**

Manage the moose hunt in Unit 20A-with certain permit and registration hunts as follows:

When the bull to cow ratios exceed intensive management objectives, the Department of Fish and Game will issue "any bull" registration permits. To avoid social and potential safety issues, the department will issue registration permits prior to, during, or after the general season falls below intensive management objectives.

**Comments:**

We support Proposal 34 to have the Department of Fish and Game issue "any bull" registration permits, when the bull to cow ratios exceed intensive management objectives" to allow more opportunity to hunt and take a moose in Unit 20A.

**Proposal 35 – 5 AAC 85.045. Hunting seasons and bag limits for moose. By Brent Keith.**

Modify the antler restrictions is[n] Unit 20A as follows:

Unit 20A residents: Wood River Controlled use Area and Yanert Controlled Use Area. 1 bull, September 1- 25.

Remainder of Unit 20A, 1 bull with spike-fork or 50-inch antlers or 3 [4] or more brow tines on at least one side.

Unit 20A nonresidents: 1 bull with 50-inch antlers or 3 [4] or more brow tines on at least one side.

**Comments:**

We support Proposal 35 with an amendment to allow "Remainder of Unit 20A, 1 bull with spike-for or 50-inch antlers with 3 or more brow tines on at least one side for Residents only. Keep Unit 20A for Nonresident hunting as it is now in regulation:

**Proposal 36 – 5 AAC 85.045. Hunting seasons and bag limits for moose. By Brent Keith.**

Require nonresidents to hunt with guides or 2<sup>nd</sup> degree of kindred in Unit20A as follows:

Nonresidents who hunt moose in Unit 20A must be accompanied in the field by an Alaskan licensed guide or an Alaskan resident 19 years or older within the 2<sup>nd</sup> degree of kindred. Expand 2<sup>nd</sup> degree of kindred to include aunt & uncle.

**Comments:**

We oppose Proposal 36 to add aunt & uncles to 2<sup>nd</sup> degree of kindred in Unit 20A for Nonresident hunters. Also, the Board doesn't have authority to change statutes.

**Proposal 37 – 5 AAC 85.045. Hunting seasons and bag limits for moose. By Brent Keith.**

Modify the muzzleloader season and antler restriction in Unit 20A as follows:

Unit 20A, muzzleloader hunt, resident and nonresident hunters: September 1 - September 25 [NOVEMBER 1 – NOVEMBER 30].

Residents: One bull by muzzleloader only permit.

Nonresidents: One bull with 50-inch antlers or antlers with 3 [4] or more brow tines on at least 1 side by muzzleloader only by permit.

**Comments:**

We oppose Proposal 37 to "modify the muzzleloader hunt, resident and nonresident hunters: September 1-September 25". We oppose any hunting season for muzzleloader hunting.

**Proposal 38 – 5 AAC 85.045. Hunting seasons and bag limits for moose. By Vince Holten.**

Modify the antler restrictions in Unit 20A as follows:

Modify the DM768 and DM770 any-bull tags to read:

One bull, except those bulls that meet the definition of spike-fork or those bulls have four or more brow tines on one side. (DM770) or three or more (DM768).

And that:

- (a) Recipients of these any-bull tags may not hunt a bull under general harvest tags in these draw zones, or
- (b) Recipients of these any-bull tags may not hunt with a general harvest ticket in any other (thus requiring utilization of these tags until herd stabilization occurs.)

It should be further recommended that any-bull tags throughout Unit 20A be used to harvest mid-range moose that are unavailable to general harvest tag holders. In particular, drawing hunts 769.771/772/773/774 that has a limited hunter access, and higher availability of tags. To help balance the bull-cow and calf recruitment, by removing the less desirable bulls from the herd.

**Comments:**

We oppose Proposal 38 to restrict DM768 and DM770 Any-Bull tags to have an antler size restriction, which is proposed as, “except, except those bulls that meet the definition of spike-fork or those bulls have four or more brow tines on one side”, and to restrict people with Any-Bull tags from hunting under General Harvest ticket hunt. People should be able to take Any Bull under the drawing hunt. Restricting people from hunting under the General Harvest and Drawing would dis-allow people opportunity to hunt.

**Proposal 39 – 5 AAC 85.045. Hunting seasons and bag limits for moose. By Larry Dalrymple.**

Close the muzzleloader in Unit 20A; open a muzzleloader hunt in 20B as follows:

Delete the muzzleloader hunt (DM766) for both residents and nonresidents in Unit 20A and establish a November muzzleloader hunt in Unit 20B,

**Comments:**

We support Proposal 39 to “close the muzzleloader hunt in Unit 20A, and to move it to Unit 20B”. There would be less conflicts between the hunters and trappers.

**Proposal 40 – 5 AAC 85.045. Hunting seasons and bag limits for moose. By Alaska Dept. of Fish and Game.**

Reauthorize the antlerless moose hunting season in Unit 20A as follows:

**Resident Open Season**

**Units and Bag Limit**

**(Subsistence and General Hunts)**

**Nonresident Open Season**

Unit 20(A) the Ferry Trail Management Area, Wood River Controlled Use Area, And the Yanert Controlled Use Area

**RESIDENT HUNTERS:**

1 bull with spike-fork antlers or 50-inch antlers or antlers with 4 or more brow tines on one side; Or

Sept. 1-Sept. 25  
(General Hunt only)

**Resident Open Season**

**Units and Bag Limit**

**(Subsistence and General Hunts)**

**Nonresident Open Season**

1 antlerless moose by drawing permit only; up to 1000 [500] permits may be issued; a person may not take a calf or a cow accompanied by a calf; a recipient of an antlerless drawing permit is prohibited from taking a bull moose in Unit 20(A); or

Aug. 25- Oct. 25  
(General hunt only)

**RESIDENT HUNTERS:**

1 bull with spike-for antlers or 50-inch antlers or antlers with 3 or more brow tines on one side; or

Sept. 1 – Sept. 25

1 antlerless moose by drawing permit only; up to 1000 [500] permits may be issued; a person may not take a calf or a cow accompanied by a calf; a recipient of an antlerless drawing permit is prohibited from taking a bull moose in Unit20(A); or

**Comments:**

We oppose Proposal 40 to reauthorize the antlerless moose hunt in Unit 20A, with a drawing permit only; up to 1000 permits may be issued. We oppose the antlerless moose hunt, there are other methods of reducing the moose population in Unit 20A. We oppose killing cow with a calf; it is against our custom and tradition to kill calves and cows.

This hunt also encourages trespass on Ahtna, Inc. lands. We have a huge problem with people trespassing on Ahtna lands.

**Proposal 55 – 5 AAC 92.510. (17) and (18) Areas closed to hunting; and 92.550 (7) and (8) Areas closed to trapping. By Denali Citizens Council.**

Expand the Stampede Closed Areas in Unit 20A and 20C as follows:

Add to the Stampede Closed Area all lands in the Wolf Townships east of the Salvage River and west of the Nenana River bounded on the south by Denali National Park and on the north by Denali Park and a line extending from the park boundary east to the Nenana River at approximately 63 degrees 54.6 minutes N. latitude (map is attached).

**Comments:**

We adamantly oppose Proposal 55 to expand the Stampede Closed Areas in Unit 20A and 20C. We oppose the “buffer zone” and expanding acreage to it. Subsistence uses should have priority over the viewing of wolves by the public. Subsistence users should have a priority over recreational users, who just want to look at a wolf. Trappers will have their trapping areas closed to them as well.

**Proposal 56 – 5 AAC 92.510 Areas closed to hunting; and 5 AAC 92.550 Area closed to trapping. By Middle Nenana Advisory Committee.**

Eliminate the Stampede and Nenana Canyon Closed Areas in Units 20A and 20C as follows:

There would be no new regulation. There would be no expansions. Both of these “buffer zones” or “closed areas” would be eliminated totally. Furthermore there would a sunset clause that would not allow any action on this issue until the year 2020, or if there was a biological reason or emergency. As always the Board of Game could use an emergency closure if they deemed necessary. If there was a biological reason or emergency, the Middle Nenana River Advisory Committee would be at forefront of closing wolf hunting and trapping until things got better.

**Comments:**

We support Proposal 56 to “eliminate the Stampede and Nenana Canyon Closed Areas in Units 20A and 20C, so that there will be “no new regulation, no expansions and both side of the buffer zones or closed areas would be eliminated totally”. See comments under Proposal 55.

**Proposal 57 – 5 AAC 92.510 Areas closed to hunting; and 92.550 closed to trapping.  
By Ray Heuer.**

Eliminate the Nenana Canyon Close Area in Units 20A and 20C as follows:

**Remove:**

(18). Nenana Canyon Closed Area – Units 20A, and 20C: those portions bounded by a line beginning at the intersection of the Unit 20A and 13E boundary and point one mile east of the George Parks Highway, then southwest along the Unit 20A and 13E boundary to the boundary of Denali National Park and Preserve, then north along the boundary of Denali National Park and Preserve to its intersection with the west bank of the Nenana River at Moody Bridge (MP 42.9), then across the Moody Bridge to the unit 20A boundary then north along the boundary of unit 20A to a point exactly one mile east of the George Parks Highway, then south on a line paralleling the George Parks Highway at a distance of one mile, to the point of beginning is closed to the taking of wolves.

**Comments:**

See comments under Proposal 55 and Proposal 56.

**Proposal 57 – 5 AAC 92. 550 (7) and (8) closed to trapping; and 92. 510 Areas closed to hunting. By Anchorage Fish & Game Advisory Committee.**

Expand the wolf closure areas in Unit.20 as follows:

Expand the current wolf protection area – the no-take “buffer” closed to trapping and hunting of wolves – to encompass a greater portion of the traditional ecological range of Denali National Park wolves.

**Comments:**

See comments under Proposal 55 and Proposal 56.

**Proposal 59 – 5 AAC 92.510 areas closed to hunting; and 92.550 closed to trapping.  
By the Defenders of Wildlife.**

Expand the Nenana Canyon closed area IN Units 20A and 20C as follows:

The existing Nenana Canyon buffer would be expanded such that the west boundary would be the east boundary of the Park; the buffer’s east boundary would be exactly one mile east of and parallel to the Anchorage-Fairbanks Intertie Electrical Power Line; the south boundary would be Carlo Creek; the north boundary would be a line due east from the east boundary of the Park through the town of Healy, to one mile east of the Intertie Line. Taking of wolves (hunting and trapping) within this buffer would be prohibited.

**Comments:**

See comments under Proposal 55 and Proposal 56.

**Proposal 63 – 5 AAC 92.510. Areas closed to hunting; and 5 AAC 92.550. Areas closed to trapping. By Mike Tinker.**

Eliminate the Stampede and Nenana Canyon Closed Areas in Units 20A and Units 20C as follows:

Don't keep the Stampede and Nenana Canyon Closed Areas on books.

**Comments:**

See comments under Proposal 55 and Proposal 56.

**Proposal 64 – 5 AAC-92.510. Areas closed to hunting; and 5 AAC 92.550. Areas closed to trapping. By Brent Keith.**

Open the Stampede Closed Area and the Nenana Canyon Closed Area in Units 20A and 20C for hunting and trapping of wolves. Get rid of these closed areas/buffer zones.

**Comments:**

We support Proposal 64 to open Unit 20A and 20C for hunting and trapping of wolves, and to get rid of buffer zones/closed areas. See our comments under Proposal 55 and Proposal 56.

**Proposal 131-5 AAC 92.110. Control of predation by wolves, and 92.115. Control of predation by bears. By the Alaska Dept. of Fish & Game.**

Make the following modifications to subsections as follows:

**5 AAC92.110(j)** An activity involving a wolf population reduction or wolf population regulation program [POTENTIALLY INVOLVING] on federal lands will not apply to lands managed and administered by the National Park Service or United State Fish and wildlife Service [UNLESS APPROVED BY] without consulting the applicable agency and, to the maximum extent possible, must be coordinated with all appropriate federal agencies.

**5 AAC92.115(h)** An activity involving a bear population reduction or wolf population regulation program [POTENTIALLY INVOLVING] on federal lands will not apply to lands managed and administered by the National Park Service or United State Fish and Wildlife Service [UNLESS APPROVED BY] without consulting the applicable agency and, to the maximum extent possible, must be coordinated with all appropriate federal agencies.

**Comments:**

We support Proposal 131 to clarify regulations so that the Department may implement control programs regarding wolves and bears on National Park Service and US Fish & Wildlife Service lands without having to get approval from them.

*Attn: Scott - Bob Int.  
Public Comment*

February 11, 2010

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

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To Whom It May Concern:

Alaska Center for the Environment (ACE), Alaska Wildlife Alliance (AWA), and Defenders of Wildlife ("Defenders") appreciate the opportunity to submit these written comments on proposals that will be considered at the February 26—March 7, 2010 meeting in Fairbanks, Alaska.

**Organizations Submitting Comments**

Founded in 1971, the Alaska Center for the Environment (ACE) is a non-profit, tax-exempt, public interest organization which depends on its active board, members, interns and volunteers. ACE is Alaska's largest home-grown citizen's group working for the sensible stewardship of Alaska's natural environment. With 7,000 dues-paying members from around the state, Alaska Center for the Environment is your voice for public lands conservation, clean air, clean water and livable places.

**Founded in 1978, the Alaska Wildlife Alliance (AWA) is the only group in Alaska solely dedicated to the protection of Alaska's wildlife. Our mission is the protection of Alaska's natural wildlife for its intrinsic value as well as for the benefit of present and future generations. AWA is your voice for promoting an ecosystem approach to wildlife management that represents the non-consumptive values of wildlife. AWA was founded by Alaskans and depends on the grassroots support and activism of its members.**

Established in 1947, Defenders is a non-profit membership based organization dedicated to the protection of all native wild animals and plants in their natural communities. Defenders focus on the accelerating rate of species extinction and associated loss of biological diversity and habitat alteration and destruction. Defenders also advocates for new approaches to wildlife conservation that will help prevent species from becoming endangered. We have field offices around the country, including in Alaska where we work on issues affecting wolves, black bears, brown bears, wolverines, Cook Inlet beluga whales, sea otters, polar bears and impacts from climate change. Our Alaska programs seek to increase recognition of the importance of, and need for the protection of, entire ecosystems and interconnected habitats while protecting predators that serve as indicator species for ecosystem health. Defenders represent more than 3,115 members, activists and subscribers in Alaska and more than one million nationwide.

PC 48 *7.20*

**Comments on the Alaska Board of Game Proposals  
February 26—March 7, 2010 Meeting**

**Proposal 3.** This would require trappers to check dry-land traps at least once each 72 hours in interior Alaska.

**We support** this proposal.

Many other states and Canadian provinces require trappers to check traps at specified intervals. Ethical trapping includes measures to humanely dispatch trapped animals to minimize suffering. Alaska's lack of a mandatory trap checking interval allows trappers to wait a week or more before checking sets thereby exposing trapped animals to unnecessary suffering as well as lost opportunities to release non-target catches. Adopting this proposal would demonstrate the Board of Game's support of best trapping practices without unduly hampering trappers.

**Proposal 4.** This would establish a year-round hunting season for coyotes (no closed season) in Unit 20 with a bag limit of 10 per day.

**We oppose** this proposal.

The justification for this proposal indicates that coyote predation on Dall's sheep is expanding and a "no closed season" regulation on coyotes would improve recruitment to the sheep population. This is de facto predator control absent field studies confirming the assertion that coyote predation is limiting sheep numbers. The coyote hunting season in this area is already very long and provides hunters with ample opportunity to shoot coyotes. There is no need to open the season during summer when coyotes are raising young. Shooting them violates sound conservation measures for a valuable furbearer species.

This proposal and several others like it raise the issue of de facto predator control. In this case, coyotes are targeted, but much de facto control has been directed at wolves. We have commented on this previously as the Board of Game (Board) has adopted measures designed to reduce wolves over much of Alaska by increasing seasons and raising bag limits so as to reduce wolf populations by hunting and trapping. These measures are not part of a designated predator control program and virtually always lack data from field studies indicating that predators in the affected areas strongly limit ungulate numbers.

In 1994, the Alaska Legislature passed the Intensive Management statute, which mandated that depleted ungulate populations found important for human use be restored to former levels of abundance. The primary intensive management tool is predator control.

Over the years since the Intensive Management law passed the Board has adopted various control programs targeting wolves. These have allowed private pilots to shoot wolves from the air and ground. In addition, the Board lengthened wolf hunting and trapping seasons and increased bag limits over virtually the entire state. The Board's rationale

was that taking these actions might increase wolf harvests, reduce wolf numbers and increase ungulate prey. In essence, this was de facto wolf control.

Wolf hunting seasons in much of the state now open in early August and close on April 30. In August wolf pups are only about half-grown and are totally dependent on adults for food and protection from predators including bears. In August, wolf hides are nearly worthless on the fur market and make very poor trophies. Hides are not prime until several months later.

In late April, female wolves are pregnant and nearly at full term. Shooting them is inhumane and not sound conservation for a species with big game and furbearer values. Hides in late April are often badly rubbed and have much reduced value on the fur market. They make poor quality trophies for hunters.

There is no evidence that excessively long wolf hunting seasons have any impact on ungulate numbers or wolf numbers, or that shortening those seasons would result in increasing wolf numbers.

There is no rationale for de facto wolf control in most areas, and the excessively long hunting seasons designed to provide de facto control are not justified. In fact, some areas like the Tanana Flats south of Fairbanks have an overabundance of game animals that could benefit from more wolf predation. The wolf hunting seasons in many areas should be shortened in order to humanely protect pups still dependent on adults in summer and unborn in late April, and to provide hides for hunters that have better fur value, either in the commercial market or as trophies. Similarly, proposals for de facto predator control on other species including coyotes and bears should be rejected by the Board.

**Proposal 5.** This proposal would exempt certain areas administered by the National Park Service (NPS) from state regulations allowing taking of black bears with artificial lights and taking bear cubs.

We support this proposal.

Previous Board of Game (Board) actions regarding taking of black bears on lands including Denali National Preserve and Gates of the Arctic National Preserve would allow use of artificial lights and the taking of bear cubs. These measures were designed as de facto predator control to reduce bears and increase ungulates. No field studies were conducted that demonstrated strong limiting effects of bear predation on ungulates in these areas, nor was there evidence that use of artificial lights was customary and traditional. We support this proposal because the Board's earlier action allowed a method of take that is incompatible with NPS laws and policies. This should be promptly rectified.

**Proposal 6.** This proposal would allow trapping of black bears and sale of hides in Units 12, 20, and 25 and classify black bears as furbearers in those units.

**We oppose this proposal.**

The justification for this proposal indicates that, if passed, it would reduce bear numbers, reduce predation on moose and caribou, and increase ungulate numbers. This is de facto predator control absent field studies demonstrating that black bear predation is strongly limiting ungulate populations in this area (see our comments on Proposal 4). We oppose these measures and oppose trapping of black bears and sale of bear parts, which have only recently become authorized in select areas of Alaska. There is no justification to extend such measures into other areas lacking a demonstrated need to reduce severe limiting effects of bear predation. We also oppose classifying bears as furbearers in certain units. Furbearer status for black bears in certain units is unwarranted and likely not legally possible unless applied statewide.

**Proposal 8.** This proposal would allow registered guides and assistant guides to maintain bear baiting stations for clients in Units 12, 19, 20, 21, 24 and 25.

**We oppose this proposal.**

The justification for this proposal implies that, if passed, it would reduce bear numbers, reduce predation on moose and caribou, and increase moose numbers. This is de facto predator control absent field studies demonstrating that black bear predation is strongly limiting ungulate populations in this area. And there is no evidence that guided black bear hunting significantly reduces bear numbers or results in less predation on moose.

**Proposal 9.** This proposal would allow registered guides to maintain up to 10 bear baiting stations in Units 12, 19, 20, 21, 24 and 25.

**We oppose this proposal.**

The justification for this proposal states that, if passed, it would reduce bear numbers, reduce predation on moose and caribou, and increase moose numbers. This is de facto predator control absent field studies demonstrating that black bear predation is strongly limiting ungulate populations. And there is no evidence that guided black bear hunting significantly reduces bear numbers or results in less predation on moose.

**Proposal 11.** This proposal would eliminate black bear sealing in interior units where harvest tickets or registration hunts provide data.

**We oppose this proposal.**

The long history of requiring black bear hides and skulls to be sealed has resulted in valuable data to better manage bear populations and to reduce illegal taking of bears. To replace data collected by trained technicians with voluntary reporting is not prudent at a time when drastic measures are being applied to reduce bear numbers in order to increase ungulates for hunters. This is yet another attempt to adopt practices never before legal in Alaska including shooting sows with cubs or cubs themselves, snaring bears, baiting

bears during summer, sale of bear parts and transporting bear hunters with helicopters. Given these measures, we support retention of the sealing regulation as a way of ensuring adequate data collection.

**Proposal 12.** This proposal would create additional brown bear tag fee exemptions in certain interior units.

**We oppose** this proposal.

The justification for this proposal indicates that waiving the resident brown bear tag fee would allow hunters, including subsistence hunters, to opportunistically harvest more bears. We regard it as yet another de facto predator control measure designed to reduce bears and increase ungulates for hunters absent field studies demonstrating that bear predation strongly limits ungulate populations in the affected units.

**Proposal 13.** This proposal would modify hunting seasons and bag limits and restrict motorized vehicles in certain areas of the range of the Fortymile Caribou Herd.

**We support** this proposal.

Several problems related to hunting of the Fortymile Caribou Herd have emerged in recent years. These include harvests that exceed allowable quotas, crowding and "combat" hunting, safety issues, increased wounding losses, and widespread ATV abuses. Reasonable restrictions on motorized access will help resolve several of these issues. They will also foster maintenance of refugia for caribou during hunting season. Such areas shrink more and more as ATV use expands.

**Proposal 15.** This proposal would reduce the Fortymile Caribou Herd's intensive management population objective.

**We support** this proposal.

The intensive management population objective for the Fortymile Caribou Herd was originally set by the Board of Game (Board) based in part on a historically high population reached in the 1920s. This was one of many cases where the Board may have set unattainable objectives that, if achieved, likely would be unsustainable. This particular objective for the Fortymile Herd must be reevaluated. Further, objectives for other herds and populations with unrealistically high objectives based on history rather than carrying capacity should be reevaluated as well.

**Proposal 24.** This proposal would restrict non-resident hunting for moose and caribou in portions of Units 12 and 20 subject to predator control.

**We support** this proposal.

We support the general concept that non-resident sport hunting should be prohibited within active predator control areas. If predator control must be applied because Alaska resident hunters have insufficient moose or caribou, non-residents should be excluded until hunting demands of residents are met.

**Proposal 27.** This proposal would lengthen the brown bear season in Unit 20A so as to allow hunting during summer months.

We oppose this proposal.

The justification for this proposal implies that, if passed, it would reduce bear numbers, reduce predation on moose, and increase moose numbers. This is de facto predator control absent field studies demonstrating that brown bear predation is strongly limiting ungulate populations in this area. Bear seasons in this Unit are already long and provide ample hunting opportunity for hunters. Bear hides in summer have no trophy value and hunting then should remain closed.

**Proposal 28.** This proposal would allow taking brown bears with bait stations in Unit 20.

We oppose this proposal.

The justification for this proposal implies that, if passed, it would reduce bear numbers, reduce predation on moose, and increase moose numbers. This is de facto predator control absent field studies demonstrating that brown bear predation is strongly limiting ungulate populations in this area. Bear seasons in this Unit are already long and provide ample hunting opportunity for hunters. The long-standing prohibition on baiting brown bears in Alaska was adopted for sound reasons and should remain in place.

**Proposal 29.** This proposal would allow taking brown bears over bait in Unit 20C.

We oppose this proposal.

The justification for this proposal implies that, if passed, it would reduce bear numbers, reduce predation on moose, and increase moose numbers. This is de facto predator control absent field studies demonstrating that brown bear predation is strongly limiting ungulate populations in this area. Bear seasons in this Unit are already long and provide ample hunting opportunity for hunters. The long-standing prohibition on baiting brown bears in Alaska was adopted for sound reasons and should remain in place.

**Proposal 30.** This proposal would allow taking of brown bears over bait in Unit 20C.

We oppose this proposal.

The justification for this proposal implies that, if passed, it would reduce bear numbers, reduce predation on moose, and increase moose numbers. This is de facto predator

control absent field studies demonstrating that brown bear predation is strongly limiting ungulate populations in this area. Bear seasons in this Unit are already long and provide ample hunting opportunity for hunters. The long-standing prohibition on baiting brown bears in Alaska was adopted for sound reasons and should remain in place.

**Proposal 31.** This proposal would expand the brown bear hunting season in Units 20A and 20C.

**We oppose this proposal.**

The justification for this proposal implies that, if passed, it would reduce bear numbers, reduce predation on moose, and increase moose numbers. This is de facto predator control absent field studies demonstrating that brown bear predation is strongly limiting ungulate populations in this area. Bear seasons in this Unit are already long and provide ample hunting opportunity for hunters. Bear hides taken in June and August have little or no value as trophies and bear season should remain closed during those months.

**Proposal 53.** This proposal would repeal the prohibition on shooting white moose in Unit 20C.

**We oppose this proposal.**

In the region in and near Denali National Park there have been occasional records of white moose for several decades. Similar records in other areas of Alaska exist, but white moose are extraordinarily rare. People viewing them are in awe. The last recorded white moose in the Denali National Park area was a female that last appeared in spring, 1990 near the Parks Highway north of Healy and was seen by scores of people over a 3-week period.

Some time ago, the Board of Game (Board) adopted a regulation prohibiting shooting of white moose in Unit 20C in order to protect these rare animals. Proposal 53 would repeal that regulation.

We strongly urge the Board to reject this proposal. White animals of several other species are known to occur. These include bison, black bears, and ravens. Many people regard these as very special animals and treasure opportunities to view them. There is no need to shoot them; indeed, shooting rare white animals would trigger great animosity toward hunters. This occurred in the Juneau area in about 2002 and led to prohibiting the taking of white black bears.

We strongly recommend that the prohibition on taking white moose in Unit 20C should remain in place.

**Proposal 66.** This proposal would establish an intensive management area in Unit 20C.

**We oppose this proposal.**

The justification for this proposal indicates that predation on moose by wolves and bears is limiting moose numbers in Unit 20C but no field studies have confirmed that premise. Predator control programs should not be adopted absent data confirming that predation strongly limits ungulate numbers. Accordingly, this proposal should be rejected. Also, Unit 20C contains much of Denali National Park and Preserve, federal land not subject to predator control by federal statutes, regulations and policies.

**Proposal 67.** This proposal would establish a bear predation control implementation plan for Unit 20C.

**We oppose this proposal.**

The justification for this proposal indicates that predation on moose by bears is limiting moose numbers in Unit 20C but no field studies have confirmed that premise. Predator control programs should not be adopted absent data confirming that predation strongly limits ungulate numbers. Accordingly, this proposal should be rejected. Also, Unit 20C contains much of Denali National Park and Preserve, federal land not subject to predator control by federal statutes, regulations and policies.

**Proposal 79.** This proposal would change registration permit and general hunt areas and season dates in Unit 19D in an attempt to increase the moose harvest.

**We oppose this proposal.**

This proposal is designed to provide longer seasons, including a 28-day February hunt, in Unit 19D, including areas subject to wolf and bear reduction programs since 2003. The justification indicates that browse removal by moose has increased in a small area where wolf and bear removal has been effective, and productivity of moose may decline. If so, there is no need to retain the wolf control program in Unit 19D East. As long as that program remains active, we cannot support proposals to increase hunting.

Predator control at McGrath began in fall 2003 and extends to the present time. As a part of the control measures, wolves are shot each winter. In addition, bears were translocated in the springs of 2004 and 2005 during moose calving season. Following the bear translocations, moose calf survival from birth to November doubled. In the bear removal area November calf:cow ratios were 51-63 calves per 100 cows—much higher than previously. This occurred primarily in a 520 square mile area termed the Experimental Micro-Management Area (EMMA). This was only a small portion of the 8,500 square miles in GMU 19D(East). Wolves were shot in an area of about 3,200 square miles (expanded to 6,245 square miles in 2006). The moose hunting season was closed in the EMMA in order to rebuild the moose population quickly.

The current number of moose in the entirety of GMU 19D(East) is unknown. Despite increased early calf survival following bear translocation, many of the calves "saved" from bears starved in the very severe winter of 2004-2005. ADFG estimated that moose

increased 30% in the EMMA (only 6% of the entire unit) mainly as a result of moving bears and closing the hunting season. Only 45 wolves were reported taken by aerial shooters between 2003 and 2007 including only 7 in 2007 from a population estimated at 98. Despite these efforts, there is no evidence that significantly more moose are now available to hunters in the 94% of the area outside the EMMA as a result of wolf control. With the small number of wolves taken recently by aerial hunters there is no indication that continuing wolf control will benefit hunters in the future.

If moose in the EMMA have, in fact, increased to the point where productivity may decline due to per capita food shortage, it is time to terminate wolf control. Only then should hunting opportunity be increased.

**Proposal 83.** This proposal would eliminate the early reporting requirement for wolves harvested in the Unit 19D East wolf control area.

**We oppose** this proposal.

Early reporting of wolves taken by hunters and trappers in the Unit 19D East wolf control area was required at the outset of the program to ensure that the specified minimum number of wolves would remain in the Unit. Annual harvests vary with hunting and trapping effort, pelt prices, winter conditions, fuel prices and socio-economic factors including alternate sources of income for trappers. Although wolf harvests in recent years have not been excessive, unexpected changes in the factors listed above may result in increased hunting and trapping effort and increased harvest of wolves. It is prudent to continue closely monitoring the wolf harvest in the wolf control area as long as the control program is in effect.

**Proposal 84.** This proposal, if adopted, would create a new predator control program featuring aerial shooting of wolves in Unit 21E.

**We oppose** this proposal, which creates a new aerial shooting program to severely reduce wolves in an area where the intensive management moose population objective has already been met. We detail below how the Alaska Department of Fish and Game (ADFG) erroneously underestimated the moose population and justified wolf control using this incorrect estimate. If adopted, this proposal would "proactively" reduce wolves before moose declined to low density which violates the intent of the Intensive Management Statute that mandates restoring the abundance of depleted ungulate populations.

Proposal 84 is an updated version of a proposal by ADFG submitted in 2009 (Proposal 239) and re-published this year as Proposal 86 after the Board of Game (Board) deferred action. In 2009, ADFG also prepared a draft adaptive management plan for predator control in Unit 21E. This plan has not been updated. Proposal 84 includes a draft predator control implementation plan that would feature reducing the wolf population in Unit 21E by 60-80% in order to increase the moose population for hunters.

### **Moose population estimates**

After the adaptive plan and proposal were prepared in 2009, a moose census was conducted in a portion of Unit 21E to supplement previous censuses done in 2000 and 2005. A wolf census was also flown in March 2009, the first such effort in Unit 21E.

The 3 moose censuses resulted in moose population estimates as follows: 2000—5,151 moose (1 moose/mi<sup>2</sup>); 2005—4,673 moose (0.9 moose/mi<sup>2</sup>); and 2009—6,218 moose (1.2 moose/mi<sup>2</sup>). These estimates applied to a 5,070 mi<sup>2</sup> portion (the moose survey area) of Unit 21E that contains 7,995 mi<sup>2</sup>. The 2009 estimate was extrapolated to the entirety of Unit 21E. Part (1)(B)(i) of Proposal 84 indicates an extrapolated estimate of 7,476 moose (range=6,205-8,747). However, this extrapolation is an error and significantly underestimates population size.

To extrapolate the 2009 moose population estimate to all of Unit 21E, the estimated moose density in the survey area should be multiplied by the number of square miles in the Unit: 1.2 moose/mi<sup>2</sup> x 7,995 mi<sup>2</sup>=9,594 moose. This is much higher than 7,476 moose erroneously claimed in Proposal 84. Similarly, extrapolating the range of values of the 2009 moose census (5,161-7,275) to all of Unit 21E results in an estimated population of 8,075-11,433 moose. This is nearly identical to the intensive management moose population objective of 9,000 to 11,000 moose set by the Board in 2000.

It is important to note that these estimates do not apply correction factors for moose not observed during the census. This results in underestimates of actual moose numbers as all aerial moose censuses fail to detect some moose due to snow, light, vegetation and wind conditions, as well as inexperienced or fatigued observers. To account for this, research has estimated sightability correction factors based on re-counts of plots and on radio-collared moose known to be present but not seen during the survey. For early winter surveys, correction factors of about 1.25 commonly are applied. For late winter surveys, factors as high as 1.4 are suggested.

Since the intensive management population objective was based on the actual number of moose present, the only valid way to compare the moose census estimates to the intensive management objective is to correct the estimates to account for unobserved animals. Using the conservative correction factor of 1.25 to correct the 2009 moose population estimate for the 5,070 mi<sup>2</sup> moose survey area yields 7,773 moose (6,218 x 1.25). The corrected moose density in the survey area is 1.53 moose/mi<sup>2</sup> (7,773/5,070), considerably higher than the uncorrected density of 1.2 moose/mi<sup>2</sup>. Extrapolating this density to obtain a moose population estimate for all of Unit 21E results in a mean of 12,232 moose (1.53 moose/mi<sup>2</sup> x 7,995 mi<sup>2</sup>) with a range of 10,154-14,311.

The error in extrapolating the 2009 moose population estimate to all of Unit 21E combined with the failure to correct the estimate for unobserved moose likely drastically underestimated the actual number of moose present. The uncorrected number claimed, 7,476, is much lower than the 12,232 moose indicated by our analysis using a conservative correction factor. Similarly, the range of values for the corrected and

extrapolated 2009 moose population estimate for all of Unit 21E (10,154-14,311) suggests that the intensive management population objective (9,000-11,000) has already been exceeded.

### **Moose population and harvest objectives and harvestable surplus calculations**

Listing the intensive management moose population objective for Unit 21E as a range of values, i.e. 9,000-11,000, illustrates a fundamental problem in determining at what level these objectives will be met. Also, the intensive management moose harvest objective is 550 to 1,100 moose. The upper limit (1,100) is 10% of the highest population objective (11,000) and 12% of the lowest (9,000). These harvest percentages greatly exceed sustainable harvests for moose in Interior Alaska. This indicates the need to re-evaluate harvest objectives in this and other areas to ensure that they are biologically achievable.

Underestimating the true number of moose present is a problem because it affects other estimates in the implementation plan including calculation of the harvestable surplus of moose and moose:wolf ratios. For example, the harvestable surplus based on the corrected estimate should be 489 moose rather than 299 as indicated in the proposal.

The moose population estimates during 2000-2009 also indicate stable moose numbers during this period. Differences among the three censuses are not statistically significant and indicate no declining trend in moose numbers. The entire proposed implementation plan is based on the possibility of a moose population decline at some future date, but no decline over the past 10 years is evident.

### **Calf:cow ratios and factors limiting moose numbers**

Part (1)(B) of the draft plan also contains estimates of calf:cow ratios obtained from fall aerial surveys during 1987-2009. Prior to 2009, ratios were 30-40 calves per 100 cows. Spring surveys indicated an average twinning rate of 31%. These numbers do not indicate a declining moose population, nor does a calf percentage of 18% obtained in the March 2005 census.

Part (1)(B)(viii) of the plan indicates that information from studies of moose in Unit 19D East (McGrath area) suggests that wolf predation would limit moose in Unit 21E if the moose population declines below 1.0 observable moose per square mile. It is impossible to predict the effects of wolf predation on moose, or to assess the similarities and differences of moose-wolf interactions in these two different geographic areas absent field data on the extent of predation on moose in Unit 21E. The claim that the McGrath results can be extrapolated to Unit 21E is totally unwarranted.

This claim assumes wolf predation is a universal limiting factor of moose populations in virtually all of Interior Alaska. Research has shown that in most Alaskan cases where moose are limited by predation, bears are at least as important as wolves in suppressing moose numbers. Further, several other factors including hunting, poor quality habitat and severe winters may limit moose far more often than predation.

The need to evaluate bear predation on moose is also implied in Part (1)(B)(viii). The 2009 adaptive management plan indicated that no brown bear or black bear population estimates are available from data collected within the area. Estimates were derived from extrapolated densities obtained elsewhere. This results in the crudest possible estimates that may be worse than none at all. There is also no information on the extent of bear predation on moose in Unit 21E based on field studies there, nor is there any information to rank the relative importance of bear versus wolf predation.

This lack of information is reminiscent of the situation at McGrath in 2000. There, local residents reported decreasing moose numbers and increasing wolf numbers with increased predation on moose—exactly the same scenario as in Unit 21E. No information on bear predation on moose was available and local residents focused on wolf predation as being far more important than bear predation. When bears were translocated out of the moose calving areas in 2003 and 2004, moose calf survival doubled. This indicated that bears were more important than wolves in limiting moose population growth. If the same is true for Unit 21E, wolf control may be ineffective as a tool for increasing moose. It is prudent to determine the limiting effects of bear predation on moose by conducting field studies before initiating wolf control. Increased funding for intensive management programs provided by the legislature in recent years was intended to fund just this sort of effort.

Although unreported harvest of moose occurs in Unit 21E and subsistence household surveys indicate higher harvests than those estimated by harvest ticket returns, there is no attempt to quantify illegal harvest. Household surveys may fail to account for illegal harvest as respondents risk prosecution if they admit to crimes.

It is widely known that illegal moose kills occur often in Interior Alaska but reliable data on the extent of such activity is scarce. The only attempt to estimate the extent of unreported and illegal harvest occurred at McGrath.

A 2003 lawsuit challenging the McGrath predator control program revealed problems related to accurately estimating moose harvests (and thus determining whether or not intensive management objectives were met—one of the triggers for a control program). One problem was the magnitude of the unreported legal harvest. The planning team found that prior to 2001, for every 50 moose reported another 40-50 were probably taken legally but not reported. A second problem is the illegal (obviously unreported) harvest. ADFG data from McGrath based on radioed animals indicated that 35 of 98 moose were killed legally by hunters and 12 were taken illegally. This indicates a ratio of about one illegally taken moose for every three legally taken. Thus, unreported legally taken moose may be as high as 100% of the reported harvest and illegally taken moose add an additional 30%.

We do not suggest that these findings can be directly extrapolated to Unit 21E, just as we question the extrapolation of other findings at McGrath to Unit 21E. But, unreported and illegal harvests should be estimated to ensure that the true harvest is not underestimated,

thereby exaggerating the extent of the problem. In certain areas, intensive management harvest objectives may already be met when all harvests, whether legally reported, unreported, or illegally taken and thus unreported, are totaled.

Part (1)(C)(v) of the proposal indicates that 600-800 moose are needed for subsistence in Unit 21 as determined by the Board. However, the Board did not break this down by subunits so the amount needed for Unit 21E is undetermined but substantially less than 600-800 moose.

The proposal suggests that wolf reduction in McGrath (Unit 19D East) led to an increase in the moose harvest. Predator control at McGrath began in fall 2003 and extends to the present time. As a part of the control measures, wolves are shot each winter. In addition, bears were translocated in the springs of 2004 and 2005 during moose calving season. Following the bear translocations, moose calf survival from birth to November doubled. In the bear removal area, November calf:cow ratios were 51-63 calves per 100 cows—much higher than previously. This occurred primarily in a 520 square mile area termed the Experimental Micro-Management Area (EMMA). This was only a small portion of the 8,500 square miles in GMU 19D(East). Wolves were shot in an area of about 3,200 square miles (expanded to 6,245 square miles in 2006). The moose hunting season was closed in the EMMA in order to rebuild the moose population quickly.

The current number of moose in the entirety of GMU 19D(East) is unknown. Despite increased early calf survival following bear translocations, many of the calves “saved” from bears starved in the very severe winter of 2004-2005. ADFG estimated that moose increased 30% in the EMMA (only 6% of the entire unit) mainly as a result of moving bears and closing the hunting season. Only 45 wolves were reported taken by aerial shooters between 2003 and 2007 including only 7 in 2007 from a population estimated at 98. Despite these effort, there is no evidence that significantly more moose are now available to hunters in the 94% of the area outside the EMMA as a result of wolf control.

Wolf control conducted since 2003 at McGrath has not “worked” because it has failed to produce significantly more moose for hunters throughout Unit 19D East. Rather, moving bears during moose calving season and closing the moose season produced modest gains in moose harvests in the EMMA. In the 94% of GMU 19D(East) outside the EMMA, there is no evidence that moose have increased as a result of wolf control and no additional moose are being taken by hunters. The reported moose harvest in 2006-2007 throughout GMU 19D was 82, less than the 115 reported in 2002-2003 before wolf control began.

#### **Wolf population estimates and moose:wolf ratios**

Results of the March 2009 wolf census in a 3,600 mi<sup>2</sup> portion of Unit 21E combined with “...observations made during the February 2009 moose survey, sealing records, and anecdotal observations...” resulted in a fall 2008 wolf population estimate of 151 animals for all of Unit 21E. The relative contribution of the aerial survey data versus the other components used to compute the estimate is not given. In the 2009 proposal (re-

published as Number 86 in 2010) a wolf estimate of 210 was given for Unit 21E. This was computed from anecdotal information and incidental observations and confirms the trend over the years of over-estimating wolf numbers when aerial survey data are lacking.

Part (1)(D)(ii) indicates a moose:wolf ratio of 50:1 based on an extrapolated February moose estimate for Unit 21E of 7,476 animals. As indicated above, this extrapolated number is incorrect and should be 9,594 moose if uncorrected for sightability, or 12,232 moose if corrected. Based on 151 wolves, moose:wolf ratios then should be 64:1 (uncorrected moose estimate) or 81:1 (corrected moose estimate). Whether 50:1, 64:1, or 81:1, these high ratios indicate that severe predation on moose by wolves alone is not likely to suppress moose calf survival or prevent moose population growth at this point in time. Research has shown that wolf predation is not severely limiting until moose:wolf ratios decline below about 30:1. With 151 wolves, the 30:1 ratio would translate to a moose population of 4,530 animals, less than half the February 2009 number of observed moose (9,594) and only 37% of the estimated number of moose in all of Unit 21E corrected for sightability (12,232).

#### **Goals of the wolf reduction program**

According to the proposal, the goal of the wolf reduction effort within the 2,617 square mile moose management area is "...to reduce wolf numbers...to the lowest level possible..." We assume this means zero, if possible. The plan indicates that outside the management area, wolves will survive such that 20% of pre-control numbers (about 30 from an initial population of 151) will persist. But the February 2009 wolf survey included less than half of Unit 21E. Absent data on wolf numbers and distribution in 55% of the unit, it may be that very few wolves exist away from the main concentration areas for moose. Such areas are mainly within the wolf control area. A more extensive, reliable wolf population survey is essential in determining the likelihood that some wolves will survive the control effort.

Parts (1)(D) and (2)(B) and (C) of the proposal state that one goal of the plan is "...to maintain wolves as part of the ecosystem..." This is claimed to be possible despite plans to reduce wolves to about 30 animals in a land area of nearly 8,000 square miles, a reduction of about 80% from a pre-control population of about 151 wolves. As noted above, this assumes that wolves occur outside the wolf control area at about the same density as they do inside, a questionable assumption given the distribution of moose. But a larger question relates to the definition of "maintain wolves" and what number satisfies this criterion. The plan fails to address the issue of preserving the ecological function of wolves as selective predators of ungulates and occasional predators of other species like beavers and hares. It also does not discuss the economic impact on trappers as a result of reducing wolves to very low numbers.

Furthermore, there is no protocol in the proposal to adequately monitor wolf numbers after the reduction each year to ensure that at least 30 wolves remain in Unit 21E. This is a common shortcoming of all the current predator control programs. Failure to conduct late-winter aerial surveys to estimate wolf numbers makes it impossible to assess whether

or not goals have been met. In this case, such surveys are doubly important as wolves might be reduced to zero within the wolf control area. No field data exist to provide a benchmark of how many wolves occupy lands outside the control area.

### **Justification of the wolf control program**

Part (2)(A) of the proposal again gives the incorrect extrapolated 2009 moose population estimate for Unit 21E. The range given (6,205-8,747) is lower than the actual range computed from the census data (8,155-11,433) and much lower than the estimate using a sightability correction factor of 1.25 (10,154-14,311).

Part (3)(A) of the proposal repeats this error of citing a much lower moose population estimate for all of Unit 21E than the data indicate. The erroneous population estimate is then the basis for an underestimate of the harvestable surplus given as 248-350 moose when the actual numbers are 326-457 for an uncorrected census, or 406-572 based on correcting the estimate for sightability.

These errors occur within the parts of the proposal that justify predator control based on failure to meet moose population and harvest objectives. Based on the only valid comparison of recent moose census data with the intensive management objective, namely by correcting population estimates for unobserved moose, the population objectives have already been met. Even if the estimate is not corrected, the intensive management population objective is met if the extrapolation is accurately done. The moose population estimate for 21E must be corrected to accurately reflect the data.

### **Proactive wolf control**

Part (3)(B) of the proposal indicates the use of a proactive predator control program, i.e., wolves would be severely reduced before the moose population declines to low density. This is a new approach to justifying a predator control program. All of the existing programs were adopted to restore depleted ungulate populations as mandated by the intensive management statute.

It is implied in this proposal that if future moose population estimates drop below one moose per square mile, the decline may continue such that the population will become "depleted." It is suggested that the Unit 21E moose population is already "depleted" because the population and harvest are below intensive management objectives. Depletion of a big game population or reduction of its productivity (that may result in a significant reduction of allowable harvest) is specifically mentioned in the intensive management statute and requires a necessary finding by the Game Board prior to adoption of intensive management programs, including predator control. Indeed, this is one of the few restraints or standards the Board must follow in authorizing predator control. It is insufficient to define "depleted" as failing to meet intensive management objectives. The intent of the statute was to require biological assessments of populations and their productivity. Game Boards predisposed to adopting predator control could set objectives arbitrarily high such that moose populations are always "depleted" if the test is

whether or not objectives are met. Perpetual predator control, needed or not, would be the end result, and moose populations at high density in need of reduction by natural predators might continue to increase and ultimately crash while still considered to be "depleted."

We strongly recommend the Board adopt a definition of depleted populations for all plans that involves biological assessments, not the artificial test of whether or not they meet intensive management objectives. In the case of Unit 21E, we contend that our re-analysis of the data indicates that the intensive management population objectives have already been met.

### **Criteria for triggering wolf control**

If this proposal is adopted, predator control will be triggered when the Unit 21E moose population drops below one moose per square mile. This is based on a population estimate using only moose observed, i.e., an estimate that does not incorporate a sightability correction factor for unobserved moose known to be present in all moose censuses. In effect, this plan lowers the bar for triggering wolf control.

Furthermore, given the results of previous moose censuses in Unit 21E from 2000 to 2009, the predator control trigger of less than one moose per square mile based on a single census presents a problem. The intent of this proposal is to arrest any further decrease in moose numbers once an actual decline is detected, but how can we ensure that any given census will truly indicate a decline is underway? For example, following the 2000 census result of 1.0 moose/mi<sup>2</sup>, the 2005 census indicated 0.9 moose/mi<sup>2</sup> which would have triggered wolf reduction. But the 2009 census indicating 1.2 moose/mi<sup>2</sup> demonstrated that a moose population decline was not underway. We contend that a single moose census result is insufficient to trigger wolf control. We suggest that a declining population trend confirmed by repeated censuses should be adopted as the required standard, and that no wolf control should be initiated until moose numbers are found to be depleted as determined by a biological assessment.

### **Non-lethal alternatives to wolf control and use of private pilots for aerial shooting**

Part (3)(C) of the proposal lists several non-lethal alternatives that might be employed to decrease predation and increase moose numbers, and dismisses them as "...ineffective, impractical, or uneconomical..." We concur that some of these, including stocking of moose, are ill-advised, but others such as predator translocation have been effective elsewhere and might be tried in Unit 21E. Legislative appropriations in recent years to fund intensive management programs have occurred and could be sought again for non-lethal applications in Unit 21E.

Part (4)(B) of the proposal recommends issuing aerial shooting permits to private pilots as the primary means of reducing wolves. We object to this, as we do for all other currently active control programs. There are many objections to private pilots conducting wolf control including a proven history of illegal shooting of wolves and wolverines

outside control area boundaries. There are humane issues as well. It is known that wounding of wolves occurs.

### **Remaining details**

Part (4)(B) also contains the "trigger" for implementing wolf reduction as "...when the midpoint of any population estimate obtained in the MSA declines below 1.0 observable moose per square mile." As stated above, this is fraught with problems. Given the low precision of the estimates, moose censuses conducted one week apart in the same area by the same pilots and observers under the same conditions could easily result in density estimates varying from 0.9 to 1.2 moose/mi<sup>2</sup> with no actual change in moose numbers. We reiterate that a better standard for triggering wolf reduction is needed.

The proposal indicates that the ADFG Commissioner will suspend wolf control when moose population objectives are attained, but there are no protocols included establishing time requirements for moose censuses, e.g., every three years. And there is no precise definition to guide a determination that harvest or population objectives have been met. These factors must be clarified by revising the proposal.

At the very end of this proposal (other solutions considered) increasing the harvest of bears is mentioned as "...one component of a multifaceted program..." relating to moose management in Unit 21E. But virtually nothing else in the proposal speaks to the possibility that bear predation on moose in this area might outweigh wolf predation as it has in almost every other place in Alaska with severe predation problems. It is prudent to determine the limiting effects of bear predation on moose by conducting field studies before initiating wolf control. We urge the Board to include protocols in the implementation plan to require such studies before a wolf control program begins.

Similarly, this proposal accepts on faith the premise that if moose density falls below one moose per square mile, wolf predation will drive moose density to much lower levels. Nothing in the proposal requires the implementation of field studies to identify the limiting factor responsible for declining moose numbers, or what factor(s) might be manipulated to reverse a decline. Research in Alaska and northern Canada has demonstrated that wolf predation is only one of several limiting factors of moose numbers. Others including bear predation, over-hunting, severe winters and poor habitat can also exert strong limiting effects. As emphasized by the National Research Council's 1997 review, limiting factors must be determined by field studies before predators are reduced. It is insufficient to assume that wolf predation is universally limiting and wasteful of funds and time if wolves are reduced and moose fail to increase because other limiting factors are dominant. We urge the Board to include protocols in the implementation plan to require field studies demonstrating the limiting effects of wolf predation on moose before a wolf reduction program is initiated.

### **Summary**

In summary, this proposal recommends adoption of a "proactive" plan to prevent decline of a moose population in Unit 21E. If adopted, this would be a departure from past intensive management predator control programs wherein moose populations declined to low levels and control was thought necessary to re-build them. Indeed, the intensive management statute refers to programs designed to "...restore the abundance..." of depleted ungulate populations. This wording is important and provides a standard for the Board such that intensive management programs are restrained from being applied where and when they are unnecessary. Adopting a "proactive" standard would pave the way toward applying intensive management predator control programs to nearly every moose and caribou population in Interior Alaska as it could be claimed that all might decline in the future. We consider this approach ill-advised and dangerous and in need of much more public discussion.

We contend that our reanalysis of the 2009 moose population estimate indicates that the moose population in Unit 21E has already met the intensive management population objective, and predator control is unnecessary at this time. The proposed proactive predator control program, if adopted, would continue the Board's failure to heed the recommendations of the National Research Council (NRC) report—a thorough review of past predator control programs and a comprehensive set of recommendations for future guidance. The Board has failed to follow the NRC's recommendations since the first control programs were adopted in 2003. Failure to adopt the recommendations has led to widespread and well publicized criticism of the control programs by the scientific community. Despite this, ADFG, by offering this proposal, now urges the Board to continue its failures. We strongly urge the Board to reject this proposal.

Proposal 85. This proposal would adopt a wolf control program for Unit 21E effective immediately.

**We oppose this proposal.**

Our re-analysis of the current (2009) moose population estimate for Unit 21E indicates a range of 8,075 to 11,473 moose (see comments on Proposal 84). This is the minimum number of moose indicated by the aerial census data and includes only observed moose. Research has shown that all aerial moose censuses fail to detect a fraction of the moose population due to wind, snow or light conditions, dense vegetation, or observer inexperience and fatigue. Accordingly, correction factors must be applied to account for unobserved moose. When the Unit 21E moose estimate is corrected using a conservative factor of 1.25, the resulting range is 10,154 to 14,311 moose.

Whether uncorrected or corrected, these estimates indicate that the Unit 21E moose population has met the intensive management population objective and therefore a wolf control program is unwarranted at this time. If the harvest objective is unmet, steps should be taken to increase the moose harvest through adjusting hunting seasons and bag limits. However, we note that the intensive management harvest objective (550-1,100) is likely too high to be sustainable and should be reduced.

**Proposal 86.** This proposal would establish a predator control program in Unit 21E. It was deferred by the Board in 2009.

We assume that with Proposal 84 which is an updated version of Proposal 86, Proposal 86 is moot.

**Proposal 97.** This proposal would allow snaring of black bears in Unit 25D.

We oppose this proposal.

Snaring of bears in Alaska has long been prohibited for sound reasons. Statewide prohibition of this method of take should continue. Piecemeal exceptions result in confusing regulations and enforcement problems.

**Proposal 98.** This proposal would allow taking of black bear cubs and females with cubs in Unit 25D.

We oppose this proposal.

The prohibition against taking bear cubs or females with cubs was adopted for sound reasons has only recently been lifted in areas with severe bear predation on moose resulting in low moose density. Extreme measures were adopted in order to re-build moose numbers for hunters.

Proposal 98 would allow taking of cubs and females with cubs for reasons other than predator control. This would set an undesirable precedent and encourage residents of other units to propose similar measures for their areas. Piecemeal erosion of the prohibition would lead to confusing regulations and enforcement problems.

**Proposal 124.** This would re-authorize the brown bear tag fee exemption for certain units.

We oppose this proposal.

In 2003 the Board of Game liberalized brown bear hunting regulations and exempted residents from paying tag fees in an effort to increase the harvest of bears and reduce predation on ungulates. This is de facto predator control absent field studies documenting that tag fee exemptions decrease bear numbers or decrease bear predation, or that bear predation was strongly limiting ungulate numbers. Also, several of the Units including, 11, 13, and 16B border include National Preserve lands where predator control is prohibited by federal laws, regulations or policies. We contend that de facto predator control is unwarranted and there is no reason to apply it through brown bear tag fee exemptions.

**Proposal 131.** This proposal would amend language in 5AAC 92.110 (j) and 5AAC 92.115 (h) governing the state's obligation to collaborate with federal agencies when adopting predator control affecting federal lands.

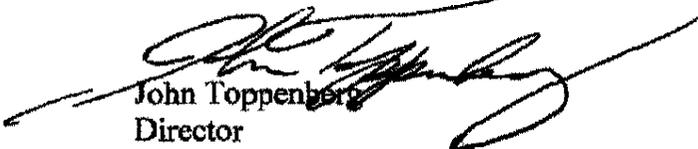
We oppose this proposal.

We interpret the intent of this proposal as lowering the bar when the state attempts to conduct wolf and bear control programs on federal land, and to further insulate the state from lawsuits challenging such programs. We contend that the current wording of these sections provides sufficiently clear direction to the state and should remain intact. We especially oppose changing the wording such that only "consultation" is required rather than federal approval. "Consulting" the federal agencies is undefined and a woefully inadequate standard no matter what definition is applied. In recent years, the state has aggressively promoted predator control on federal lands including National Wildlife Refuges and National Preserves where federal laws, regulations and policies restrict such efforts. Proposal 131 is yet another attempt to force the issue and we strongly oppose its adoption.

Thank you for considering our comments.

Sincerely,

Valerie Conner  
Conservation Director  
Alaska Center for the Environment

  
John Toppenberg  
Director  
Alaska Wildlife Alliance

Karla Dutton  
Alaska Director  
Defenders of Wildlife

## COMMENTS ON REGION III BOARD OF GAME PROPOSALS FOR 2010

### Proposal #16 *SUPPORT*

I am sure the money side of this question will have many objections but allowing a business to have equal access to limited game as residents do seems very unfair. This proposal does not forbid non-resident hunting. It merely gives locals first chance at game which is supposed to belong to all Alaskans..

I notice that in caribou hunting there has been an advantage to local hunting even though hunters from other parts of Alaska may have hunted there for years and this is exclusive of non-resident hunters. Since this is so, it only seems right to allow Alaskans first chance at sheep for the limited time of 5 days.

I hope the board returns to the approach they had two years ago and supports this proposal.

Sincerely,

Nancy Sydnam

5041 W 80<sup>th</sup> Ave

Anchorage, Ak 99502

12 Feb 10

Alaska Board of Game

Re: Proposals #16 and #70

Proposal #16: I support the adoption of Proposal #16. The proposal would be beneficial to Alaskans, the owners of the shared resource. It would benefit both residents and non-residents by not having as many hunters afield at the same time. It also would serve to give Alaskans a leg up on their success percentage, which is good, because that is what most states do for their own residents.

Proposal #70: I would be in opposition to proposal #70 to allow ATVs in the Wood River Controlled Use Area. After witnessing the ATV damage which occurred on the Rex Trail, I don't believe it a good idea to expand the opportunity for such damage to occur.

Thank you for the consideration;



Gary Halmstad

3411 Lil's Way

Fairbanks, AK 99709

479-8850

**Attention : Board of Game Comments    Feb. 12, 2010**  
**Alaska Dept. of Fish and Game**  
**P.O.Box 115526**  
**Juneau AK 99811**

**FAX 907-465-6094**

**Dear Board:**

**This is our comment**

**We strongly SUPPORT Proposals 55, 58, 59, 60, 65.**

**These are to expand the current buffer zones for Toklat wolves. They need this extra protection and few people would be impacted by this.**

**We strongly OPPOSE Proposals 56, 57, 61, 62, 63, 64 which would shrink or eliminate buffer zones. Only a few vicious trappers who could trap on thousands of square miles elsewhere would be prevented from destroying packs that an enormous number of tourists come to see every year. There should be at least a few place where wolves are safe. The Toklats are very habituated to humans, so that trapping near the Park boundaries puts them at great risk.**

**Sinicerely.**

**Dr. Michael and Dr. Joyce Huesemann**  
**POB 998**  
**Carlsborg, WA 98324**  
**jhuesemann@olypen.com**



IN REPLY REFER TO:

FWS/AFES

## United States Department of the Interior

## FISH AND WILDLIFE SERVICE

1011 E. Tudor Road  
Anchorage, Alaska 99503-6199

Mr. Cliff Judkins, Chairman  
Alaska Board of Game  
Boards Support Section  
P.O. Box 115526  
Juneau, Alaska 99811-5526

Dear Chairman Judkins:

The U.S. Fish and Wildlife Service (FWS) appreciates the opportunity to comment on proposals to be considered by the Alaska Board of Game (BOG) during its spring 2010 meeting addressing Interior Region issues. We would like to provide the following comments on proposals 90A and 94 which would affect management of moose populations in Unit 24 including lands within the Kanuti National Wildlife Refuge.

**Proposal 90A** would establish a State registration moose hunt in a portion of Unit 24B and Unit 24C within the Kanuti Control Use Area from December 15 to April 15 with a harvest limit of one antlered bull.

The FWS **supports adoption of proposal 90A**. This would provide more subsistence opportunity, especially for residents of Allakaket, Alatna, Evansville and Bettles, who have been experiencing hardships in recent years. There has been a shorter winter bull moose hunt on Federal public lands in recent years but this has taken considerable time and effort by both our refuge staff and the hunters who were restricted to hunting on Federal public lands only. Only one moose has been harvested during this winter hunt over the past three years combined. These proposed season dates would help by extending the season over a longer period and allowing hunters to use both State and Federal lands.

This longer season would also allow hunters more time to locate antlered bull moose while doing their normal winter activities and hopefully reduce their expense and effort expended. This season would also allow more opportunity during the early winter when bulls have antlers and should help to minimize the chance of a hunter taking a cow moose by mistake.

The FWS **opposes proposal 94** which would change the boundary of the Kanuti Control Use Area so that it includes Fish Creek Lake as the northeast point.

Mr. Cliff Judkins, Chairman

2

This new boundary line would create confusion for both hunters and law enforcement officers. This change appears to benefit one user who uses a cabin in the affected area seasonally at the expense of all other users in the area.

Thank you for your time to review our comments on these proposals. If you have any questions, please contact Jerry Berg, Subsistence Coordinator, at 786-3519.

Sincerely,



Acting Regional Director

9500 Prospect Drive  
Anchorage, Alaska 99507

February 12, 2010

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

*By Fax: 907-465-6094*

**Re: Support for Denali National Park wolf buffer proposals  
(Proposals #55, 58, 59-60, 65)**

Dear Board of Game members:

My wife and I have resided in Alaska since 1968. Since we first arrived in Alaska, we have followed the various efforts made to protect (or to not protect) the invaluable wildlife resources of Denali National Park -- particularly the wolf packs that range inside (and sometimes outside of) the Park without regard to the artificial legislated boundaries that may mean survival or death for longstanding wolf packs, and for individual wolves.

We support -- at a minimum -- continuation of the existing wolf protection buffer from hunting and trapping that is now in place. Thus we support -- at a minimum -- continued closure to hunting and trapping of the state-land areas around the perimeter of the Park that are now closed. To the extent that any of the above proposals would enlarge the protected area to more completely protect the range of these packs, and would more completely accomplish the goal of long-term protection of the wolf packs that range in and out of the Park, we support those proposals also.

At a minimum, we believe the Board of game is obligated, by the cooperative agreement of 1982 between the Alaska Department of Fish & Game and the National Park Service (NPS), to adopt Proposal #65 that is being requested by NPS.

The wolves of Denali National Park are an international resource, available for the enjoyment and education of millions of people. It would be an extremely short-sighted management decision by the Board of Game if the National Park managers' request to protect these animals from hunting and trapping when they range outside the Park boundaries were to be disregarded, and the buffer zones rescinded, in favor of the hunting and trapping opportunities of a very few individuals.

As a living resource, these wolves are "recycled and renewed," and owned publicly, and are seen annually by thousands of people, who spend millions in the local economy for that privilege. As dead tanned and stretched hides, these wolves will benefit only a few private individuals, and for a mere pittance in private value. On the scales of relative benefit and cost, the correct answer to the wolf buffer issue is too obvious to require further comment.

Sincerely yours,



Tom and Jane Meacham

February 12, 2010

To:

Attn: Board of Game Comments  
Alaska Dept of Fish and Game  
Boards Support Section  
PO Box 115526  
Juneau, AK 99811-5526  
Fax: (907) 465-6094

From: John Giuchici  
118 Dunbar Avenue  
Fairbanks, AK 99701

Interior 2010 Meeting  
February 26, - March 7, 2010  
Fairbanks, Alaska

Proposal 33 – “Opposition”

This proposal is flawed in many ways and should not be adopted by the Board of Game. The liberal antlerless harvests in parts of Unit 20 over the last four years have resulted in much of the accessible hunting areas to be over harvested. The vast majority of the hunting public is not ready and will not accept any calf harvest until the moose population rebounds in the over harvested accessible areas. The burden on hunters to determine that a cow is not accompanied by a calf is no different than what is required for black or brown bear hunters. Anyone who wants to shoot the first patch of brown they see in the field should not be in the field hunting. A hunter that cannot distinguish between a ninety day old moose and a one year and ninety day old moose should not be allowed in the field for any moose hunt.

Please, “DO NOT ADOPT”.

Proposal 62 – “Support”

This proposal is clear and straight forward. This is a sizable area with good access that would provide additional quality hunting opportunity if adopted.

It is appalling that the Dept. of Fish and Game would inject “harvest of cows and calves” in Units 20A and 20B with regard to this proposal. The goal is to increase the moose population and then deal with harvest issues. To use the “Hostage” or “Big Stick” approach to achieve your goal in another area is very degrading for the Department, not to mention how they are viewed by the public.

Please, “ADOPT”

Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
PO Box 115526  
Juneau, Alaska 99811-5526  
FAX: 907-465-6094

12 February 2010

Dear Alaska Board of Game Members:

I am expressing my concern for the upcoming decision regarding wolf-hunting/trapping buffers at your Spring meeting. As you consider the various proposals, I would ask you to consider the following points:

- Living and working in and near Denali National Park & Preserve, I have the opportunity to see and interact with thousands of tourists each summer. One of the programs I teach is about wolf research in the Park. Visitors are fascinated with wolves and long to see one in the wild. As our number of wolves decreases, it is clear that they need further protection in order to guarantee that there are even wolves to observe in the Park. Not everyone comes to see the mountain. It is our mega fauna that attracts many tourists who then spend their tourism dollars in and around Denali.
- From Adolf Murie to David Mech to Gordon Haber to the current researchers of today, the wolf packs of Denali National Park & Preserve have been studied since the 1940's. The information gleaned from scientific inquiry is invaluable in determining the interaction of predators and prey in this international biosphere.
- The state lands within the wolf townships have been recognized as important winter habitat for Denali Park wolves over more than 25 years. Telemetry has shown that wolves move into the wolf (Stampede) townships from their home territories deep within the park during the winter months. This makes wolves from not only nearby home territories but far-off territories within Denali vulnerable specifically during trapping season.
- Analysis of recent declines in the census of Denali Park wolves shows that trapping and hunting losses have become a more important factor in their deaths. Use of the precautionary principle in the management of these animals is suggested by such data.
- The nearness to a major transportation corridor, the Parks Highway, means that trappers from far off locations can operate near Denali's boundary and benefit from the winter migrations of these animals. Add to this the liberal trapping and hunting bag limits in Unit 20 and the potential for harm to Denali Park wolves is magnified. (Trapping take, per regulations, is unlimited, season is Nov 1 and Apr 30) (Hunting take is 5 wolves per hunter, season is Aug 10 – May 31)
- The Alaska Department of Fish and Game and Denali National Park pledged, through a Memorandum of Agreement in 1982, to cooperate in the management of their mutual areas of interest. The Department of Fish and Game has agreed to recognize the management priorities of National Park lands.

In conclusion, I would like to express my support of the proposal submitted by the Denali Citizens Council and ask the Alaska Board of Game to have the courage to move forward with protecting the wolf packs of Denali National Park & Preserve. The wolves and the grizzlies are the barometers of our maturity as a species. If we can live with an animal that could just as soon eat us as an apple, if we can make room for an animal that traverses hundreds of miles looking for a mate, how better to define the art of compassion?

Thank you for your time.

Sincerely,  
NJ (Nancy) Gates



8-20-10

*Alta Scott  
Public Comment  
Interior*

**RECEIVED**  
**FEB 12 2010**  
**BOARDS**  
**ANCHORAGE**

**Dear Sirs (Madams) of the BOG**  
**Feb.9/10**

**I am writing this letter to ask your support and plead that you do the RIGHT and ETHICAL thing in expanding the buffer zones around Denali Park boundary.**

**As a scientist (M.D. with background in wildlife biology) , a musician, and (from what I am told )...an ethical and humane member of the human race, I am appalled by the proposed legislation that would allow for the potential extinction of a much beloved and admired wolf pack that has been habituated to human presence...namely the Toklat pack!**

**Where else can tourists (20%)hear and occasionally see elusive wolves in AK?**

**It is a large drawing point for Denali....**

**Gordon Haber has long tried to increase these buffer zones ...not unlike the zones that have been created around Algonquin PK by Dr Theberge in Ontario...but that was NOT until the wolf packs were virtually exterminated by trappers and wolf haters....(one can always find a reason to kill a wild animal unfortunately!)**

**Since wolves cannot shop at Safeway :-)) for their food they are obliged to follow the prey ...which of course wanders outside of the park boundary....and "bingo" that were the "brave trappers"...all 5 or 6 of them.... set up their torture/killing devices.Why?**

**Aren't there other means of of providing exceptionally warm clothing or making money than killing these magnificent keystone predators that provide such an important function by maintaining a balanced ecosystem.(see National Geographic report on Yellowstone wolves)..and a mesmerized tourist base!!!**

**Besides wolves are highly intelligent , social , complex animals that have bonds that we can only hope to aspire to...killing them destroys a family ....not just "a wolf"**

*p 1 of 2  
EC 56*

**And what is the "sport" in tracking these animals with radiocollars...setting up traps in there habitual territories!.....is this humane and fair?**

**Wolves are NOT aware of Park boundaries and besides, as mentioned, need to follow the prey base....also VERY FEW individuals are impacted by increasing the buffer zones...namely a few trappers**

**Trapping is a horrible gruesome way to kill an animal...especially a wolf....mates and family members hang around and try to help the dying animal is it cannot chew off its leg....how would you feel if your son or daughter got trapped in rubble and you had to watch a similar scenario..?..these animals live in "families'....or packs ...are emotional and highly intelligent as well documented by numerous biologists, etc,,,not just Gordon Haber!!**

**I have been to Alaska quite a number of times and was planning a Denali trip....but will NOT go if proposals 56 ,57 61 62 63 and 64 are enacted. I STAND IN OPPOSITION TO THESE BRUTAL MEASURES which would endanger the survival of the TOKLAT pack...an American wildlife treasure!**

**I DO support 55,58 59, 60 and 65.!!!**

**Pls expand the BUFFER zones as they have done in other areas of Canada &US.**

**Finally ,in honor of Gordon Haber's legacy...a man who truly loved and tried to protect these magnificent creatures,.....(like him or not!).....and who gave up his life trying to do this; please EXPAND the protective buffer areas around Denali**

**Thanks for your time and interest**

**Dr.I de Baintner MD FACSM (Major USAF, retired)  
1 Meeting House Hill Rd  
Dover MA 02030**

**ph 508 785 2455**

*p 2 of 36*

Dorie Klein  
6165 Austin Crk Rd  
Cazadero CA 95421

Alaska Department of Fish and Game  
Juneau, Alaska

**RECEIVED**  
**FEB 12 2010**  
**BOARDS**  
**ANCHORAGE**

Dear Board,

Please consider out-of-state tourists when you decide how much state protection to afford Denali's wolves.

I will never forget seeing a wild wolf on the Tenana River, as a winter visitor on the Alaska Railroad.

I hope to return, but will carefully monitor Alaska's policies toward protecting its wildlife as a factor in planning any trips.

I strongly support *expanding* the state's "buffer zone" for the wolves based around Denali National Park to minimize nearby trapping.

Yours,

Dr Dorie Klein

FAX To: 907-465-6094

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

From: (907) 683-1358

Nan Eagleson, Member of the Nenana River Fish and Game Advisory Council,  
P O Box 114, Denali Park, AK 99755

Please support the Denali Wolf Buffers proposed by the Denali Citizens Council: Proposal 55

I have lived and worked in the Denali area since 1987 and recognize the value of wolf viewing, or simply the possibility of seeing wolves, provides for a vast number of tourist who visit Denali National Park. The economic value of the particular packs which frequent the areas of the proposed buffers is particularly important to the economy of this area.

The Park additions to the north, which were added in 1980, were recognized as important winter habitat for caribou. This is primarily why the wolves leave the safe haven of the wilderness portion of the Park and move into the Stampede area during trapping season. Recent declines of Park wolves show an increase of deaths due to hunting and trapping in these areas relative to past history.

The value of research accumulated for 80 years on Denali wolves deserves recognition. As one of the few places on earth where wolves go unmolested by humans, the integrity of the Alaska Fish and Game and the National Park Service for wildlife management will come into question if priority is not given to protecting these few packs. Given the history of this State and its management of wolves, this seems like an opportunity to improve a tarnished image and protect an important resource.

Nan Eagleson

PO Box 114

Denali Park, AK 99755

907-683-2822

Board of Game,

I would like to state that I am in support of Proposal #16 by Tom Lamal. I believe that an extended season for resident hunters is a step in the right direction to protect and enhance the hunting experience for the people who live in this State.

If the Sheep population cannot sustain the current hunting pressure then that is a separate issue that should be dealt with using sound management practices. Currently it appears that our Wildlife Resources are managed by politics and money. Many Western States limit Non-Resident tags to 10% of the overall limit, and some of the Canadian Provinces use a quota system for the Guides and Outfitters.

These resources belong to the people of Alaska. Any commercial uses should be secondary considerations.

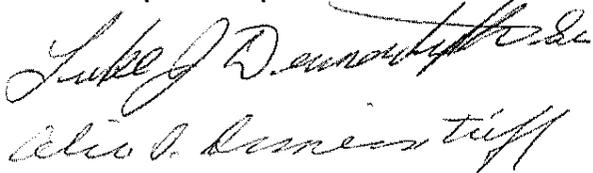
Respectfully,  
Michael R. Dullen  
PO Box 72914  
Fairbanks, Ak. 99707

February 12, 2010

**Proposal 80: We are opposed to this proposal.** There should be NO change for the fall hunt in Unit 21E for non-residents, especially on our Corporation land. We are trying to take care of the breeding stock that stay inland or away from rivers. This WILL NOT help residents if non-residents are allowed an extended hunt in Unit 21E. When the big bulls come out from inland to the sloughs, they are in the rut. After September 25<sup>th</sup>, no resident would harvest the larger bulls because the meat is not edible. I have not heard about Guides and their hunters passing meat around in the village of Holy Cross, no one here will want "rutted" meat. Non-resident hunters are only interested in big horns; meat is nothing to most of them. If the hunt is lengthened in Unit 21E for non-residents, we will end up like the Kenai area- whose residents are struggling with their moose population that took many, many years to get back what they once had due to non-resident hunters. I recommend to the Board do not allow the non-residents to take our breeding stock; this area belongs to the local people as it has been for 150+ years.

**Proposal 81: We are opposed to this proposal.** There should be NO change for the fall hunt in Unit 21E for non-residents, especially on our Corporation land. We are trying to take care of the breeding stock that stay inland or away from rivers. This WILL NOT help residents if non-residents are allowed an extended hunt in Unit 21E. When the big bulls come out from inland to the sloughs, they are in the rut. After September 25<sup>th</sup>, no resident would harvest the larger bulls because the meat is not edible. I have not heard about Guides and their hunters passing meat around in the village of Holy Cross, no one here will want "rutted" meat. Non-resident hunters are only interested in big horns; meat is nothing to most of them. If the hunt is lengthened in Unit 21E for non-residents, we will end up like the Kenai area- whose residents are struggling with their moose population that took many, many years to get back what they once had due to non-resident hunters. I recommend to the Board do not allow the non-residents to take our breeding stock; this area belongs to the local people as it has been for 150+ years.

Thank you for your consideration.



Luke and Alice Demientieff  
Holy Cross Elders

To: Alaska Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
Juneau, AK

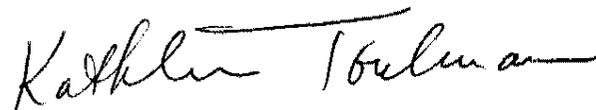
Feb.11, 2010

I have been a visitor to your beautiful state for many years. I have enjoyed traveling throughout your state; fishing, camping, viewing the exceptional scenery and wildlife. I have especially enjoyed my visits to Denali National Park. It is truly a fantastic park. I am writing to support the proposals to expand the current buffer zone adjacent to the Park boundary for Denali's wolves.

I was watching the TV show on The National Parks last night "America's Best Idea" and it focused on the buffalo of Yellowstone and the how they would have been wiped out in the U.S. and within the Park, if not for the action and planning of the American people. I am not writing to say to stop the hunting of wolves throughout Alaska...but save and preserve the Denali wolves by expansion of the buffer...proposals 55,58,59,60 and 65.

Thank you for taking this under consideration.

Kathleen Toubnan  
Readfield Maine



February 15, 2010

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

**Dear Members of the Alaska Board of Game:**

I am representing myself although I am also a member of the Fairbanks Advisory Committee.

**PROPOSAL 70 - OPPOSE**

**Allow the use of motorized vehicle for permit winners hunting in the Wood River Controlled Use Area in Unit 20A.**

I oppose Proposal 70 to revise the Wood River Controlled Use Area (WRCUA) regulation. This long standing controlled use area has worked well for many decades. Now more than ever, I believe it is critical to retain the regulation as it stands. The Board of Game has wisely upheld the WRCUA regulation in the past and I ask that you maintain that position now.

While I support responsible use of motorized vehicles for hunting access and meat hauling in some areas; ATV use for hunting in this area would be devastating for the following reasons:

1.     **Environment** - the area contains much brush, tundra and swampy ground. Widespread destruction of the countryside would occur in the first season even if only "permitted" hunters were allowed motorized vehicle access. Reversing the destruction of habitat would likely not occur in our lifetime.
2.     **Traditional Hunting** - the WRCUA is one of the only areas in 20A which restricts access by motorized vehicles during the general hunting season. In all fairness, this is the primary area used by resident hunters and guides who prefer more traditional hunting methods. Currently the area is accessed heavily by those who prefer to hike, fly-in, raft and/or use horses to hunt.
3.     **Social Issues** - impacts to the Rex Trail would increase since this is one of the few access trails into the area. The same user conflicts and access abuse we are seeing now on the Rex Trail would escalate and additional private property and social issues would occur in new areas.
4.     **Commercial Use** - most traditional guide operations and recreation and touring companies would be severely impacted and likely go out of business. Once the "foot was in the door" the focus by ATV users would be to open up the entire WRCUA during the general season.

This would certainly create many issues for the Guide Use Concession Program.

My family has a long hunting history in the Healy Creek and Wood River drainages since the 1940s. My husband and I continue to own family property in the heart of this area. I have personally hunted, recreated and/or assisted guided in the area since 1964 using horses and bush plane for access. The effects of this proposal would be far reaching not only to me personally, but those who love the beauty of this country and traditional hunting opportunity.

Please uphold the Wood River Controlled Use Area designation as it stands and **do not adopt Proposal #70**. Thank you for allowing me the opportunity to comment.

Respectfully,



Debra Waugaman Curnow

---

**PROPOSAL 16 - SUPPORT**

**Modify the Season Dates for Dall Sheep for all of Region III**

I am a lifelong Alaskan and hunter and support this proposal. Staggering the sheep season for residents and non-residents will increase the quality of the hunt for everyone. Additionally this should help improve social issues and hunter conflicts.

While some guides may argue this proposal could result in fewer licenses and non-resident tag purchases resulting in decreased revenue to the Department of Fish and Game, I doubt there would be little if any impact. Hunters interested in a Dall sheep trophy, won't be deterred by a variation in season dates. Some years there are more opportunities for trophy rams on later sheep hunts when snow pushes the big rams into lower areas. Ultimately this proposal just allows residents a few more days to hunt and maintains the same season dates for non-residents.

In addition, according to ADFG biologists, this proposal should not impact the sheep population because of the full curl regulations. The only result may be a slightly higher success rate for residents. Currently the resident sheep hunter success rate is less than half of the guided non-resident hunter success rate for taking rams.

Bottom line, everyone has a better hunting experience. Please **support Proposal #16**. Thank you for allowing me the opportunity to comment.

Respectfully,



Debra Waugaman Curnow

Kathleen T. Wagner  
17700 SW 89 Court  
Palmetto Bay, FL 33157  
February 10, 2010

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

To All Board of Game Members:

This letter is written to support Proposals 55, 58, 59, 60 and 65 which seek to expand the current buffer zone adjacent to the Denali National Park boundary.

Denali's Tokiat wolves are the most studied and viewed wolf pack in the world. Hundreds of thousands of visitors travel the Park road hoping to see these wolves every year and about twenty percent are fortunate enough to see or hear these wolves. For the majority of visitors this is the highlight of their trip and the primary purpose of their visit.

The proposals seeking to expand the buffer zones are modest, extending the protected zone for wolves by less than ten miles. This is no land grab because there are many millions of acres of land outside the proposed buffers where wolf trapping and hunting are legal.

Few individuals would be impacted by an expanded buffer zone. There are only about five trappers targeting these wolves on the Park border.

These trappers targeting the Park wolves are extraordinarily successful. Research shows 30% of Park wolf mortality is human caused, i.e. trapping and shooting. This is because the wolves are habituated to human activity and the trappers know exactly where to set their traps.

Opportunistic trapping is a critical issue, and could determine the long-term survival of the Tokiat pack lineage.

I SUPPORT PROPOSALS 55, 58, 59, 60, AND 65.

I OPPOSE PROPOSALS 56, 57, 61, 62, 63, and 64, which seek to shrink or eliminate the current buffers, thereby allowing trapping right up to the Park boundary.

*Kathleen T Wagner*  
Respectfully,  
Kathleen T. Wagner

Public Comment to the Alaska Board of Game  
February 12, 2010

Re: BOG Spring 2010 Proposal Book Interior Region  
Fax to: Alaska Board of Game 907-465-6094  
From: Linda Wagner/ 141 Neese Dr. V452/ Nashville, TN 37211

Proposal 55 SUPPORT

The dramatic loss of the wolf population from 116 in 2006 to the current number of 65 strongly indicates the need for a buffer area around Denali National Park. Fewer wolves= fewer tourists.

Proposal 56 OPPOSE

Eliminating buffer zones around Denali National Park opens the door to further damage and destruction of wolf packs that are supposed to be protected for wildlife viewing and scientific observation made by park visitors.

Proposal 57 OPPOSE

This proposal will ultimately reduce opportunities for visitors to Denali National Park to actually see a wolf in the wild--the very reason thousands of people travel to the area in the first place.

Proposal 58 SUPPORT

Buffers areas around Denali National Park are important to the continued protection of the wolf population and its direct impact on economic and ecological resources. Thousands of visitors to the park come to see the wolf packs.

Proposal 59 SUPPORT

Documented loss of wolf population due to human cause supports the necessity of expanded buffer zones around Denali National Park.

Proposal 60 SUPPORT

Ecological integrity of Denali National Park's wolf packs depend upon the expanded buffer areas that will protect them. Preserve the experience of park visitors traveling from around the world to see these animals!

Proposal 61 OPPOSE

Eliminating buffer zones around Denali National Park will increase the likelihood of continued wolf pack destruction and this loss for wildlife viewing will directly impact the travel industry.

Proposal 62 OPPOSE

The wolf population inside Denali National Park will likely end up suffering losses due to the easy access to protected wildlife that wanders across park boundaries. Decimated wolf packs will not allow tourists to see wildlife they would expect to view in a national park.

Proposal 63 OPPOSE

Do not eliminate buffer zones and allow unrestricted hunting and trapping which already have vast open areas. The buffer areas by comparison are very small but crucial to the protection of the Denali National Park wolf population.

Proposal 64 OPPOSE

Removing restrictions on buffer areas will negatively impact wolf populations inside Denali National Park by allowing hunting and trapping in adjacent areas to the park and the resulting further loss of wolf numbers. This increases the loss of wildlife viewing, tourist trade and scientific observation of national park visitors.

Proposal 65 SUPPORT

National Park visitors travel many miles just for the lucky chance to see a wolf roaming free in the wild.-- they *do not* want to see a half-snared animal as a result of the actions of hunters and trappers just across park boundaries.

February 11, 2010

From: Anne Beaulaurier  
PO Box 67  
Denali National Park, AK 99755

To: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
PO Box 115526  
Juneau, Alaska 99811-5526  
FAX: 907-465-6094

RE: In Support of Proposal #55, Spring 2010 Proposal Book, Interior Region

**As a resident of the Denali Borough, I submit this letter is in support of retention and expansion of no-take areas in the Stampede (Wolf Townships) and Nenana Canyon regions of Units 20C and 20A, as described in proposal #55.** In recent years, the number of wolves in Denali National Park have declined dramatically, from 116 in 2006 to a current population of 65. At the same time, pressure from hunting and trapping just outside the park's boundary has also intensified. The human caused mortality rate for collared Denali Park wolves has nearly doubled in the last six years from what it was between 1986 and 2002. This is no time to let those buffers expire.

Denali National Park is of world-class significance as a destination for visitors to experience an intact ecosystem, a park with all of its native species, and very minimal impact from non-native species or development. This ecosystem's predators, including wolves, are a major draw for the hundreds of thousands of tourists who visit the park each year. Denali is one of a few select, accessible National Parks where wolves may be seen in the wild; it provides the best wolf viewing opportunities within the state of Alaska, and is second nationally only to Yellowstone. The Stampede area, just outside the park boundary, is part of the habitat that sustains the Denali Park wolves. They are a park resource that regularly strays from the park boundaries in a relatively predictable way on a seasonal basis. They follow the caribou that often feed in the windblown plains of the Stampede area in wintertime. Wolves from many miles away routinely visit the ridges and hills around the Stampede, particularly near the Rock Creek Drainage, as illustrated by GPS collar data and personal observations. Given tourism is the most important economic generator for residents in the Denali Borough, protecting wolves in this part of their habitat should be addressed. **This is a special issue of protecting a park resource, very valuable to the economics of the borough as watchable wildlife, in a small area of state land where they are particularly vulnerable to hunting and trapping.**

As a member of the local community, I recognize the value in trapping and hunting as a way of life in rural Alaska. I am sympathetic to the need to have reasonable access to harvesting areas. *However*, there is nothing ethical or sportsman-like about trapping or hunting along the border of a National Park to take advantage of Park wolves in their winter habitat. In addition, the Nenana Canyon area, and buffer down through McKinley Village no-trapping areas, offer safe recreating areas for local residents and their families.

My year-round employment is tourism related and I deal directly with thousands of visitors each summer. Besides hoping to glimpse Denali, to see a wolf in the wild is a dream for many, and a significant part of the reason they have come to Denali. Taking wolves along the border of the park is not a concept that is acceptable to park visitors, either. Furthermore, seeing wolves in the park with snares around their necks (as happened more

than once in the last couple of years), further tarnishes visitors' opinions of trapping. **Please allocate some protection for wolves in the Stampede and Nenana Canyon area for watchable wildlife. It will have a very minor impact on the nearly 99% of state land that is currently open for wolf hunting and trapping, but can have a significant impact on the health and view-ability of wolves in Alaska's number one tourist destination.**

The many reasons why Proposal #55 should be adopted are stated in the body of the proposal, so instead of discussing those further, I would like to remind the Alaska Board of Game that the Alaska Department of Fish and Game's Memorandum of Understanding (MOU) with the National Park Service (1982) recognized the differing resource management goals of the State agency and of the NPS. The MOU recognized the "increasing need to coordinate resource planning and policy development" and to "consult with each other when developing policy, legislation and regulations which affect the attainment of wildlife resource management goals and objectives of the other agency." This is a just such a time when the National Park Service's recommendation should be headed. They have submitted Proposal #65 which also calls for expanded no take boundaries adjacent the Denali National Park.

**I urge the Alaska Board of Game to adopt a proposal to retain, and expand, the Stampede and Nenana Canyon no-take areas for wolves. Proposal #55 offers a logical way to accomplish this.**

Thank you for considering this important issue.

Sincerely,



Anne Beaulaurier

**COMMENTS ON REGION III BOARD OF GAME PROPOSALS**

**PROPOSAL #70 OPPOSE**

I am against the use of motorized vehicles in the Wood River Controlled Use Area. Current access is by rafting, aircraft, horses and hiking for those who prefer a traditional hunt. The access damage on the Rex Trail is a perfect example as to why this area should remain closed to motorized traffic. Unit 20 A has a lot of area for motorized use and the WRCUA is a very small portion of this unit. I enjoyed hunting this area once for caribou and the reason I applied for a permit was to avoid motorized areas. There are areas where aircraft can't be used and this is a place where motorized vehicles should be prohibited.

Please **OPPOSE** proposal #70.

Sincerely,

Tom Lamal

1734 Becker Ridge Road

Fairbanks, Alaska 99709

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

11 February 2010

**PROPOSAL 3 - 5 AAC 92.095. Unlawful methods of taking furbearers;**

I support proposal 3. I have witnessed the suffering of both target and non-target animals captured by leg hold traps and snares left for weeks to die a slow and torturous death. A well documented event supporting my comment is the trapping of the alpha female (collared) wolf of the East Fork (Toklat) family group in February 2005 mere feet outside the east border of the stampede closed area (current "buffer"). This wolf was held by both a leg hold trap and snare and suffered for almost 2 weeks as supported by necropsy report and GPS data. This wolf had broken nearly every tooth attempting to chew out of the cable snare and trap; her body weight was down to 56 pounds. I witnessed the trapper shooting the live wolf and remove her by snowmachine.

This proposal impacts the unethical and recreational trapper only. Many recreational trappers set their traps on their day off and return when it is convenient for them. With no time limit, a trap line may sit for an entire trapping season without being checked resulting in wanton waste, non-target taking and unnecessary excessive suffering by trapped or snared animals.

**PROPOSAL 55 - 5 AAC 92.510 (17) and (18) Areas closed to hunting; and 92.550 (7) and (8) Areas closed to trapping.**

I support proposal 55 as a possible solution. (Reference proposal 58 comments)

**PROPOSAL 56 - 5 AAC 92.510 Areas closed to hunting; and 5 AAC 92.550 Area closed to trapping.**

I oppose proposal 56. This proposal lacks scientific justification and has no factual evidence to support the submitter's claim. Furthermore the submitters "sunset clause" demonstrates an emotional and vindictive intent.

**PROPOSAL 57 - 5 AAC 92.510 Areas closed to hunting; and 92.550 Area closed to trapping.**

I oppose proposal 57. This proposal lacks scientific justification and has no factual evidence to support the submitter's claim.

**PROPOSAL 58 - 5 AAC 92.550 (7) and (8) areas closed to trapping; and 92.510 Areas closed to hunting.**

I support proposal 58. Every year for the past 10 years I have witnessed wolves that range primarily in Denali National Park temporarily migrate east following caribou into the Stampede Flats and east of the eastern park boundary area only to get trapped, snared or shot. It is scientifically acknowledged (Murie/Haber/NPS) that the eastern Stampede Flats are a vital part of the Denali National Park ecosystem. The wolves affected are not limited to those that claim the eastern edge of the park and eastern stampede flats as

home territory. I have seen wolves from as far west as the upper Foraker temporarily migrate east following caribou into the eastern stampede flats. Upon crossing the park boundary and current no take "buffer", these wolves are subject to a gauntlet of traps and snares that are intentionally set mere inches from the boundary. These forays of western park wolves are well documented by the Park Service and Dr. Gordon Haber and are supported by my personal observations spread over 10 years and thousands of logged and documented hours of aerial wolf observations in Denali National Park.

Recreational trappers are specifically targeting park wolves by placing their traps and snares along the Denali National Park boundary and the existing no take "buffer" (Stampede closed area). I know these trap line locations well as I have flown over them for the past 10 years. I have seen the impact to scientific research due to the loss of these park wolves. I have also witnessed the biological impact of the loss of these park wolves. Example: The loss to trapping of the alpha female and loss to hunting of the alpha male of the East Fork (Toklat) family group in 2005 left only yearlings for leadership. Because the yearlings and pups had not yet learned the techniques of hunting ungulates, this group survived predominately by hunting hares, previously only rarely observed. Not until 2008 did observations support the conclusion that the East Fork (Toklat) Family Group learned the cooperative skills and techniques to hunt their traditional primary prey of ungulates. The repercussions of the human caused loss of park wolves are far reaching as evidenced by the previous example and many additional documented events (research of Murie/Haber/NPS). Implementing this proposal increases the protection of park wolves by legally acknowledging that the eastern Stampede Flats and Nenana River corridor east of the present park boundary are indeed part of the park ecosystem for which park wolves have traditionally and currently depend upon for survival.

**PROPOSAL 59 - 5 AAC 92.510 areas closed to hunting and 92.550 areas closed to trapping.**

I support proposal 59 as a possible solution. (Reference proposal 58 comments)

**PROPOSAL 60 - 5 AAC 92.510 Areas closed to hunting and 5 AAC 92.550 Area closed to trapping.**

I support proposal 60 as a possible solution. (Reference proposal 58 comments)

**PROPOSAL 61 - 5 AAC 92.510. Areas closed to hunting.**

I oppose proposal 61. This proposal lacks scientific justification and has no factual evidence to support the submitter's claim.

**PROPOSAL 62 - 5 AAC 92.110. Control of predation by wolves; 5 AAC 92.125. Predation Control Implementation Plans.**

I oppose proposal 62. This proposal lacks scientific justification and has no factual evidence to support the submitter's claim.

**PROPOSAL 63 - 5 AAC 92.510. Areas closed to hunting; and 5 AAC 92.550. Areas closed to trapping.**

I oppose proposal 63. The submitter's claims are contradictory to factual research data as supplied by proposals 55, 58, 59, 60 and 65.

**PROPOSAL 64 - 5 AAC 92.510. Areas closed to hunting; and 5 AAC 92.550. Areas closed to trapping.**

I oppose proposal 64. This proposal lacks scientific justification and has no factual evidence to support the submitter's claim.

**PROPOSAL 65 - 5 AAC 92.510. Areas closed to hunting; and 5 AAC 92.550. Areas closed to trapping.**

I support proposal 65 as a possible solution. (Reference proposal 58 comments)



Troy Dunn  
North Pole, Alaska

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

February 12, 2010

Dear Board of Game Members,

I wish to express my strong **OPPOSITION to PROPOSAL 16**, requesting modification of Dall sheep hunting dates to grant special preference to resident hunters, by allowing them a 5 day "head start" over non-resident hunters, and their required Alaska guides.

The current low success rate of resident Dall sheep hunters is due primarily to lack of hunting skills, not "the many resources guides have in place" as suggested by the drafter of this proposal. I have been guiding non-resident sheep hunters successfully amidst significant competition for well over 25 years and my "many resources" for the past 10 years consist of a couple 2 man nylon tents!

There is no justification for this proposal whatsoever from a biological or subsistence standpoint. If adopted, it will create much hardship for guides whose primary clientele consist of non-resident hunters. Sheep are very sensitive to hunting pressure and having resident hunters stumbling around the hills for 5 days prior to a guide's arrival with his client will be disastrous to a very important industry in this state.

Proposal 16 is nothing more than a selfish attempt by an Alaska resident to exclude competition from another user group who happen to fund about 80 percent of all wildlife management in the state of Alaska, and to disrupt the lives of guides who depend on that user group to support our families.

Sincerely, 

Dave Morris

Attn: Board of Game Comments  
Fax # (907) 465-6094

Comments on Region III Board of Game Proposals for 2010

**PROPOSAL # 16: SUPPORT**

We strongly support the modification of the season dates for dall sheep for all of Region III to give resident hunters the advantage of a longer and earlier season. Most resident hunters do not have the capability of the resources and advance set up that guides have. My husband and I have hunted dall sheep in Alaska every year for 25 years. The presence of guides and resident hunters in the same area at the same time always results in conflict. It usually results in the resident hunter leaving to hunt elsewhere. Other states give their resident hunters preference and political pressure from guides has kept Alaska from doing the same. Non residents assisted by guides are harvesting over 50% of the dall sheep taken.

**PROPOSAL # 70 OPPOSE**

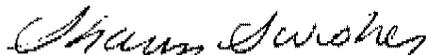
We strongly oppose allowing the use of motorized vehicles in the Wood River Controlled Use Area. This is a sensitive area for the staging of moose pre rut and rut and should be protected from the **HIGH** degree of disturbance that motorized vehicles create.

Sincerely,



Richard Swisher  
2721 Cormorant Street  
Fairbanks, AK 99709

AND



Sharon Swisher  
2721 Cormorant Street  
Fairbanks, AK 99709



February 11, 2010

Board of Game Comments  
Alaska Department of Fish & Game  
Boards Support Section  
P.O. Box 115526  
Juneau, Alaska 99802-5526

Fax: 907-465-6094  
Total Number of Pages: 3

RE: Opposition to Proposal 16

Dear Alaska Board of Game,

I am a lifelong Alaskan, born in Fairbanks where I currently reside with my wife and two of my daughters, and am an active licensed Master Guide and Outfitter.

Please accept the following comments regarding Proposal #16, which will be before your review at your Interior meeting in Fairbanks in a few weeks.

**Proposal #16: Strongly OPPOSED**

I do not support proposal 16, which would increase the length of the resident Dall Sheep season in all Region III units while at the same time shorten the Dall Sheep season for non-residents.

This same individual has been trying to pass similar proposals for the last few years and while I do not know this individual personal and thus hold no ill will towards them I am strongly opposed to this proposal.

According to the most recent public statistics on the ADF&G website (<http://www.wildlife.alaska.gov/index.cfm>) in 2008 there were a total of 2,114 Dall

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**PC 70**

sheep hunters in Alaska that actually went hunting, excluding those that for one reason or another did not pursue Dall sheep in 2008. Of those 2,114 hunters 1,695 were resident hunters and only 419 were non-resident hunters. The resident hunters killed 91 more Dall sheep than the non-resident hunters in 2008 (352 harvested by residents and 261 harvested by non-residents).

Resident hunters generally harvest more Dall sheep rams in Alaska than non-resident hunter, who in most cases are on a guided hunt or within second-degree of kindred of an Alaska resident. It is true that guided non-resident hunters have a significantly higher success rate in harvesting rams but that is in large part due to the experience of their guides due to their extensive time spent Dall Sheep hunting as part of their profession and that should not detract from the simple facts that the majority of sheep killed each year in Alaska are killed by resident hunters and are not harvested by non-resident hunters.

I respectfully disagree with this proposal's author that this proposal will help to reduce the conflicts between resident hunters and non-resident hunters. Was this proposal, or a proposal similar to this, to be passed than in my experienced opinion there would actually, in all reality, be more competition for the opportunity to harvest a ram than there currently is and the reason for this is simple.

Currently it is illegal for a guide to hunt Dall sheep while they are in the field guiding a client. Under this proposal what would happen in my opinion is that guides, like myself, would simply go to the very same areas that they have been operating in but would arrive before this proposed resident season opening date of August 5<sup>th</sup> and then the guides themselves would hunt for the first eight days of the season and have an opportunity to harvest a ram each year for themselves, something I have not yet done in my 21 year guiding career in Alaska.

So what is proposed to reduce conflicts I suspect will only actually increase the potential for conflicts as there will actually be more "Dall Sheep hunter days" (resident, guides and non-resident hunters pursuing Dall Sheep) during that time period than as it stands now, where guides are not permitted to hunt while guiding a client in the field.

This proposal could also have a potentially significant negative impact on the revenue a guide is able to generate to help support themselves, their families and their contribution to the Alaska economy as already many potential non-resident Dall Sheep hunters are choosing to hunt in Canada and a reduction in the non-resident hunter season would just be an additional incentive for non-resident hunters to pay more to hunt in Canada and thus further hurt our guiding industry, State of Alaska economy and the ADF&G budget.

As I suspect the Board of Game is well aware, according to a University of Alaska study, the guiding industry is close to 200 million dollar a year industry in Alaska. Though some may prefer to not acknowledge that fact, it is a significant amount of money that we directly help to contribute to the State of Alaska economy. Though we as an industry have never asked for direct advertising support from the State of Alaska's

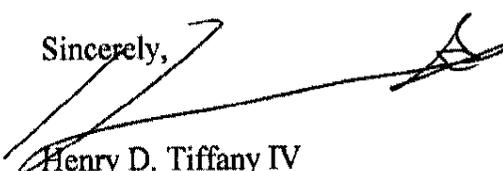
tourism advertising campaigns we have significantly helped to support the tourism advertising budget here in Alaska. As you might be aware, as a result of the federal Pittman – Robertson Act, approximately 85% of the Alaska Department of Fish & Games budget is derived from the sale of licenses and tags to non-residents of Alaska and a large portion of those very non-residents hunters that help to generate those funds for the ADF&G will not continue to come to Alaska to hunt if, in essence, they are penalized for not residing in Alaska and cannot begin hunting Dall Sheep until after residents have had a full eight days of hunting in areas.

Again, in blunt terms, resident hunters already harvest more Dall sheep than non-resident hunters do annually and as such I see no need whatsoever to lengthen and increase the season for resident hunters when they are already harvesting more sheep than the non-resident hunters. All resident hunters may not be as successful on hunts, due to a lack of experience for some resident hunters (though I know many resident hunters that are excellent and very successful sheep hunters) but as a group resident hunters still harvest more rams and I see no real basis for a proposal such as this when it will do far more harm to the overall sheep population, the guides of Alaska (such as myself that support our families in large part through guiding non-resident sheep hunters) and it will not solve the conflicts in the field but only potentially increase those occurrences.

I would strongly encourage the Board of Game to not change the resident or non-resident Dall sheep seasons in Region III but let them stand as they are now and as they have been for many, many years.

In advance, I thank you for your time and consideration and commend your efforts to regulate our fish and wildlife opportunities here in Alaska. If you have any questions, or if I may be of any assistance, please feel free to contact me at either 907-223-3226 or 907-456-4868.

Sincerely,



Henry D. Tiffany IV  
Lifelong Alaska Resident and  
Master Guide & Outfitter

**United States Department of the Interior**  
**NATIONAL PARK SERVICE**  
**Alaska Region**  
**240 West 5<sup>th</sup> Avenue, Room 114**  
**Anchorage, Alaska 99501**  
**TELEFAX MESSAGE**

**Date:** February 11, 2010

**To:** Mr. Cliff Judkins, Chairman  
Alaska Board of Game Comments  
Alaska Department of Fish and Game  
Board Support Section  
P.O. Box 115526  
Juneau, Alaska 99811-5526  
Fax: (907) 465-6094

**From:** Regional Director National Park Service Alaska Region

**Subject:** National Park Service Alaska Region  
Comments on Proposals for the Interior Spring  
February 26 – March 7, 2010, Meeting

Number of pages to follow: 4

Faxed by: Clarence Summers  
National Park Service, Alaska Region  
Tel. (907) 644-3603



## United States Department of the Interior

### NATIONAL PARK SERVICE

Alaska Region  
240 West 5<sup>th</sup> Avenue, Room 114  
Anchorage, Alaska 99501

IN REPLY REFER TO:  
L30 (AKRO-SUBS)

February 11, 2010

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

Dear Chairman Judkins:

We have reviewed 132 proposals before the Board of Game (BOG) beginning on February 26, 2010. Enclosed are our recommendations on proposals that affect or have the potential to affect National Park Service (NPS) areas in Alaska. We appreciate your consideration of our comments.

As you have heard from the NPS in the past, our mission and mandates differ from the State of Alaska and other Federal agencies, and may require different management approaches consistent with NPS enabling legislation and the Alaska National Interest Lands Conservation Act (ANILCA). We recognize and support the State's fundamental role in wildlife management, while at the same time we must assure that the laws and regulations of the National Park Service are upheld. Where specific proposals might implement intensive management objectives, contrary to NPS policies, we ask that NPS areas be excluded from any regulations you may authorize in those areas. We also recognize and appreciate previous Board actions that have not authorized predator control on NPS managed lands.

NPS is concerned about proposals that implement population reduction activities for black bear, brown bear, wolf and coyote on National Preserve lands. We are also concerned about expansion of bear baiting, because NPS has a long history of trying to prevent habituation of bears to food rewards, both to protect bears and for visitor safety.

#### National Park Service Proposals

**Proposals #5 & 65 -- Adopt - GMU 19 & 24 and GMU 20 C - Affected NPS Preserves: Gates of the Arctic National Preserve and Denali National Preserve** - Both are proposals submitted by the NPS. We continue to support these and recommend that you adopt them as submitted. We will have a representative from both Denali National Park and Preserve and

Gates of the Arctic National Park and Preserve at your meeting to testify and to answer any questions you may have.

**Proposals #55-61 & 63-64 - Take no action – GMU 20 A & C – Affected NPS Preserves: Denali National Preserve-** These proposals recommend a number of different management actions focused on wolf management adjacent to Denali National Park. As stated above we recommend support of proposal #65.

### **Predator Control**

**Proposals # 62, #67 and (# 32 – from BOG winter 2010 meeting -Proposal was deferred) - Modify to exclude NPS managed lands – GMU 20 C and 9 C & E – Affected Preserves: Alagnak National River, Aniakchak National Preserve, Denali National Preserve, and Katmai National Preserve** – These proposals involve predator control as defined in State regulations. As we have expressed to the Board on prior occasions, predator control is not allowed on NPS managed lands without the consent of the NPS. Should the Board pass these proposals, we recommend that you add language that will explicitly exclude any NPS lands that are in the predator control area.

**Proposal #131** – This proposal affects both NPS and U.S. Fish and Wildlife Service (USFWS) lands in a number of locations around the state. Our agencies have submitted comments on this proposal in a separate letter.

### **Intensive Management**

**Proposal #33 – from BOG Winter 2010 meeting (Proposal was deferred) – Adopt – GMU 9 C & E – Affects Preserves: Alagnak Wild River, Aniakchak National Preserve, and Katmai National Preserve** - The NPS believes that the recommendation to review population objectives is warranted.

**Proposals #4, 6, 8, 9, 29, 30, 66 - Modify to exclude NPS managed lands – Multiple GMUs – Affected Preserves: Denali National Preserve, Gates of the Arctic National Preserve, Wrangell-St. Elias National Preserve, and Yukon-Charley Rivers National Preserve** – These proposals involve intensive management efforts that would be undertaken in specific areas. As we have expressed to the Board on prior occasions, intensive management of wildlife species is of concern to the NPS and is contrary to NPS policy. Should the Board pass these proposals, we recommend that you add language that will explicitly exclude NPS lands in the area targeted for intensive management regulations.

### **Fortymile Caribou Herd Management**

**Proposal #14 – Adopt and Take no action on #13,15,19,20,21**  
Considerable effort has been dedicated to the management of the Fortymile Caribou Herd by local advisory groups. Proposal #14 would revise the herd's Harvest Plan and is a result of cooperative efforts between a coalition of the Eastern Interior Regional Advisory Council and State Advisory Committees from Eagle, Central, Delta, Upper Tanana-Fortymile and Fairbanks.

The proposed changes address issues with the management of the hunt. These changes would likely result in a more widely distributed harvest both in time and location, while providing opportunity to resident and non-resident hunters. We recommend that the Board continue to work with the coalition of groups established fifteen years ago by the Fortymile Caribou Plan, and consider their proposed revisions to the Harvest Plan as needs arise. We encourage this comprehensive and coordinated approach and feel most of the other issues raised by the individual proposals are addressed in proposal #14.

### Specific Proposals

**Proposal #18- Support in concept – GMU 12 – Affected Preserve: Wrangell-St. Elias National Preserve** – Most of the hunt will occur on Wrangell-St. Elias National Preserve lands. We recommend that the regulations allow flexibility for ADF&G managers to work closely with Federal managers to implement a joint hunt that incorporates input from both the Upper Tanana Fortymile Fish and Game Advisory Committee and the affected Federal Subsistence Regional Advisory Councils while adhering to the tenets of the interagency management plan. As one of the participants in the interagency management planning process for the Chisana Caribou herd, the NPS supports the completion of the Chisana Caribou Herd Management Plan.

**Proposal #28 – Take No Action – GMU 20 - Affected Preserve: Denali National Preserve, Yukon-Charley Rivers National Preserve** – The National Park Service is concerned about food conditioning of brown bears in NPS areas and the habituation of bears to food rewards, both to protect bears and for visitor safety.

**Proposal #96-Adopt - GMU 26 B&C – Affected Preserve: Gates of the Arctic National Preserve** – This proposal will make the mink and weasel season consistent with the majority of the trapping seasons in Unit 26. There are no known conservation concerns for these species and they currently can be retained as incidental catch in other trap sets.

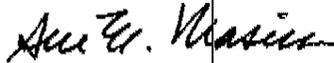
**Proposal # 99 – Adopt – GMU 25 C&D & GMU 26 C – Affected Preserve: Yukon-Charley Rivers National Preserve** – This proposal submitted by the Alaska Department of Fish and Game, shortens the nonresident season and reduces the bag limit for the declining Porcupine Caribou Herd. In 2009, the Yukon government implemented similar conservation measures and restrictions to protect the Porcupine Caribou Herd.

**Proposal #102&104 – Take No Action - GMU 26B – Affected Preserve: Gates of the Arctic National Preserve** -- These proposals would change the resident caribou season and bag limit. Proposal #103 with modification is the NPS recommended approach to this issue.

**Proposal #103 – Adopt with Season Modification – GMU 26B – Affected Preserve: Gates of the Arctic National Preserve** – The proposed modification would establish an open season of May1-June 30 for Remainder GMU 26, South of 69 degrees 30'N and would shorten the season by 30 days. Opening the season on May 1 would give greater certainty the hunted animal is in fact a barren cow based on antler loss. The proposed hunt area restriction (South of 69 degrees 30' N) protects calving areas during this period.

We appreciate the opportunity to provide you with comments on these important regulatory matters and look forward to working with you on these issues. Should you have any questions please contact Deborah Cooper at (907) 644-3505 or Dave Mills at (907) 644-3508.

Sincerely,



Sue E. Masica  
Regional Director

cc:

Denby Lloyd, Commissioner, ADF&G  
Doug Larsen, Director, Wildlife Conservation, ADF&G  
Kristy Tibbles, ADF&G  
Tina Cuning, ADF&G  
Pat Pourchot, Special Assistant to the Secretary for Alaska  
Geoff Haskett, Regional Director, FWS  
Chuck Ardizzone, FWS  
Greg Dudgeon, Superintendent, Yukon-Charley Rivers NPres/Gates of the Arctic NP&P  
Joel Hard, Superintendent, Lake Clark NP&P  
Meg Jensen, Superintendent, Wrangell-St. Elias NP&P  
Ralph Moore, Superintendent, Katmai NP&P  
Paul Anderson, Superintendent, Denali NP&P  
Deborah Cooper, Associate Regional Director, NPS Alaska Region  
Dave Mills, Subsistence Team Manager, NPS Alaska Region  
Sandy Rabinowitch, Subsistence Manager, NPS Alaska Region  
Chris Pergiel, Chief Law Enforcement Officer, NPS Alaska Region

February 11, 2010

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

Post-it® Fax Note	7671	Date	2-11-2010	# of pages	1
To	Board of Game	From	Lynn Ledgerwood		
Co./Dept.	Fish & Game	Co.	Citizen		
Phone #		Phone #	360-570-3312		
Fax #	907-465-6094	Fax #	360-956-7433		

**Re: Toklat Wolves**

I was horrified to learn that Denali's Toklat wolves, the most studied and viewed wolf pack in the world, are being trapped as they migrate outside the Park boundary following their winter prey. This opportunistic trapping, some of which is being conducted by seasonal contract employees of the Park Service, has been a hotly disputed topic for more than a decade. These employees use their "insider knowledge" of the wolf packs' movements to set their traps at prime locations just outside the Park boundary. I encourage you to talk with those who have followed wolf packs in Yellowstone and other areas as they have found that having wolves where they have always been and belong, actually makes ecosystems much healthier. As an apex predator, the existence of wolves shows that nature is in balance – take them out and you make the ecosystem unstable. We have to learn from all the horrific mistakes we've made in the past about wildlife, or we will be left with a wasteland devoid of life.

There are currently two small buffer zones - where trapping is not allowed - on State land adjacent to the Park. One of those areas has been downsized in recent years by appointees of the Murkowski and Palin administrations, who truly have no appreciation for God's creation. I hope you can find the courage not to destroy, but to protect; to see the big picture that by protecting and nurturing all your wildlife, Alaskans can make a very profitable living off of them.

I **support** the following proposals – 55, 58, 59, 60 & 65. These proposals seek to expand the current buffer zone adjacent to the Denali National Park boundary and are the right thing to do. These expansions are very modest indeed and are no land grab, because there are many millions of acres of land outside the proposed buffers where wolf trapping and hunting are legal. Why not hire the trappers to protect these amazing animals instead of destroying them?

I **oppose** the following proposals – 56, 57, 61, 62, 63 and 64. These proposals seek to shrink or eliminate the current buffers, thereby allowing the slaughter right up to the Park boundary.

Gordon Haber, a wildlife biologist, spent a lifetime studying Denali's Toklat wolves and was a tireless advocate for expanded buffer zones around the Park. He died in a tragic plane crash while tracking these wolves last fall, and expanded buffer zones would be a fitting memorial.

Please always keep in mind that the ultimate test of a moral society is the kind of world it leaves to its children and I will pray for all of you that you decide to protect these magnificent creatures, which is the right thing to do.

Thank you,



Lynn Ledgerwood  
 2605 Otis St. SE  
 Olympia, WA 98501

**LAW OFFICE OF KNEELAND TAYLOR, P.C.**

425 G Street, Suite 610  
Anchorage, AK 99501  
907-276-6219 telephone  
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February 11, 2010

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

Attention: Board of Game

Re: Spring Meeting: 2010  
Proposals 55, 58, 59, 60, 65, and 84

Dear Board Members:

Please consider my comments on the following proposals:

Proposals 55, 58, 59, 60, and 65. Support.

These five proposals would expand the existing buffer zones adjacent to Denali National Park. I support these proposals.

The issue is the trapping of what I refer to as "the East End Wolves" of Denali National Park.

Hundreds of thousands of people travel the Park road hoping to see these wolves every year. I am one of these people. I have seen some of these wolves near the Igloo camp ground inside the Park. That memory is something I cherish.

There are only five people who are known to trap the East End Wolves as they migrate outside the Park in winter. Thus, we have a contest

Board of Game

February 11, 2010

Page 2 of 3

between the interests of five trappers versus the interests of more than 100,000 wildlife viewers.

It is a gross misallocation of resources to allow the trapping of these wolves. The East End Wolves are natural resources belonging to all the people of Alaska, including myself, and the thousands of Alaskans who enter the Park to view them.

Furthermore the trapping of the East End Wolves is a slap in the face to the wildlife viewers who treasure the opportunity to see and hear these wolves. Those who trap those wolves, and those who authorize the trapping, grossly insult all of us. Of all the disputed wildlife issues, this is the one where the stark chasm between trappers and wildlife viewers is most starkly shown. Those who would authorize five people to rob more than 100,000 people demonstrate hatred, anger, and domineering personalities.

The current buffers are too small. Recent surveys apparently show that 30% of wolf mortality for the East End Wolves is human caused. The East End Wolf with a wire snare embedded in its neck is a demonstration of that. Clearly, opportunistic trapping on the borders of the Park negatively impacts viewing inside the Park.

If the Department and Board members have the slightest concern for the interests of Alaskan citizens who enjoy wildlife viewing, then the Board and the Department need to think about the people they will insult if the buffers are not expanded.

How about an olive branch instead?

Proposal 84. Oppose.

This proposal would authorize preemptive predator control. I oppose it all the other predator control proposals.

Board of Game  
February 11, 2010  
Page 3 of 3

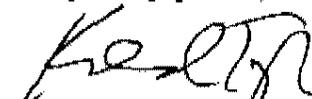
I have had the opportunity to read a draft copy of Vic Van Ballenberge's lengthy comments on this proposal. His draft contains extensive analysis of the problems (and lack of success) regarding other predator control efforts, in particular the McGrath area program. Mr. Van Ballenberge's comments should be reviewed by all members of the Board of Game, and by the Department's senior management, since they make clear that the predator control programs currently in effect are mostly failures, and based on ignorance and superstition.

And then there is the matter of the expense. Recent figures I saw show more than \$5 million is being spent on these programs.

Incredible.

Incidentally. I am not an opponent of all predator control programs. It is programs which continue for multiple years, are cruel to the predators, and not needed to maintain naturally occurring populations which I oppose. And proposal 84 would create one more of these bad programs.

Very truly yours,



Kneeland Taylor



# AK Adventures

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February 11, 2010

Mr. Cliff Judkins  
Chairman  
Alaska Board of Game  
P.O. Box 25526  
Juneau, AK 99802-5526

Re: Interior Board of Game Proposals

**Proposal #3: Support** - This is a "no-brainer" for the reasons stated in the proposal. Any ethical trapper or hunter should support and endorse the proposed trap check times.

**Proposals # 55, 58, 59, 60 and 65: Support** – Increased protection is needed for these wolves which are important to Alaska, both economically and scientifically.

As an Alaskan, owner of a wildlife viewing business and wildlife photographer, I believe it is essential that more protection be given for these world-famous wolves. I am always asked by clients and visitors "where can we see wolves?" and I tell them "Denali National Park".

However, I now feel that this may no longer be the case. This past summer I went to Denali National Park for two weeks to specifically photograph wolves and did not get a single wolf photo. I was told by the National Park Service that the numbers of wolves were down, due to wolves being trapped outside the Park and that this trapping has caused the extirpation of several of the most famous and viewable of Denali's wolf packs.

By increasing the buffer area for these wolves it will benefit Park visitors and photographers who want to see wolves in the wild, tour operators and the Alaska tourism industry.

**Proposals 56, 57, 61, 62, 63, and 64: Oppose** - The current buffer is not adequate and eliminating it makes no sense.

P.O. Box 2828 • Homer, Alaska 99603 • Phone: 907.235.1805 • Fax: 907.235.1886

[www.goseebears.com](http://www.goseebears.com)

**Proposals 131: Oppose** – I find it really hard to believe that there is any “confusion” about the needed consent as stated in the proposal. However, if that is the case than the term “approval” needs to be clarified, not removed.

Thank you for your time and considering my comments.

Sincerely,

Dave Bachrach  
AK Adventures  
P.O.Box 2828  
Homer, AK 99603

Feb. 10, 2010  
2003 Kuhn St.  
Pt. Townsend, Wa. 98368  
joaniebeldin@cablespeed.com

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

I am writing in regards to the trapping of the Denali Toklat wolves outside of the National Park. As you are well aware, these wolves are the most studied and viewed wolves in the world.

I urge you to **support Proposals 55, 58, 59, 60 and 65** which would expand the current buffer zone adjacent to the Denali National Park boundary. This buffer zone is modest, extending the protected zone for wolves by less than ten miles. This is no land grab, because there are many millions of acres of land outside the proposed buffers where wolf trapping and hunting are legal.

On the other hand, I urge you to **oppose Proposals 56, 57, 61, 62, 63, and 64**. These proposals seek to shrink or eliminate the current buffers, thereby allowing trapping right up to the Park boundary. It is my understanding that these trappers have a high rate of success since the wolves are habituated to human activity and the trappers know exactly where to set their traps.

Hundreds of thousands of visitors travel the Park road hoping to see these wolves every year, and 19 percent of these visitors have the great fortune to see or hear these wolves. These wolves represent the wildness of Alaska to many people. If not for the wolve's sake, but for the economy of Alaska and public relations, it will behoove you to provide these wolves with the buffers and additional protection as requested.

Thank you for your consideration in this matter.

Sincerely,

Joan Beldin



To Board of Game:

First, let me say I am a hunter and in years past I also trapped, however I have not done the latter in many years.

I don't need to go into all the specifics about buffer zones and the controversy surrounding trapping along the north boundary of Denali.

I simply want to ask, why is it so hard for you to offer a compromise? I ask that you show some concern to the people that want to protect the area around Denali. This battle only strengthens peoples negative feelings about trappers and trapping. I personally, don't agree with the practice, but at least I would be willing to try and work with local trappers instead of creating more hostilities.

It is not like asking you to not trap at all. However, photos of smiling trappers holding up dead wolves that are part of the Denali pack does not help your cause.

Whatever your feelings on predators, I feel Denali and the surrounding "buffer" areas need to be protected.

Thank you for your time. Thomas Klein

Talkeetna 907 7336616

10 February 2010

Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
PO Box 115526  
Juneau, Alaska 99811-5526  
FAX: 907-465-6094

I urge the Board of Game to vote for Proposal 58 submitted by the Anchorage Fish and Game Advisory Committee, to restore the existing Denali wolf buffer to encompass the entire 600-square-mile area adjacent to Denali National Park, in order to provide necessary protection for Denali's wolves.

Denali's wolves are worth far more alive than dead. These wolves are among the most easily viewed in the world, making them a significant tourism draw and of importance to Alaska's tourism economy. They also represent the longest studied group of wild wolves in the world, making them of great research value worldwide.

However, Denali's wolves have special vulnerability on state lands just outside the park. In winter, they move into the wolf townships just outside the park, putting them near the road system where they are easy prey for hunters and trappers.

Recent declines in the numbers of park wolves—and in the most commonly-viewed packs—show that trapping and hunting are taking far too many of these wolves. Data from radio-collared wolves show a doubling of human caused deaths in the last six years alone. While the park's target population 120 wolves, in spring 2009 only 68 were counted.

The Board of Game has a responsibility to consider the special status and vulnerability of the Denali wolves. In the early 1990's, the Board of Game recognized this and established a buffer of approximately 600 square miles—nearly the exact same boundaries as are now delineated in Proposal 58. Also, through a 1982 MOU, the state agreed to recognize the management priorities of National Park lands, and to cooperate in managing areas of mutual interest. Denali's wolves are being decimated by lack of protection on state lands; The Board of Game must therefore institute regulations to protect these wolves in concurrence with the MOU.

Please restore the Denali wolf buffer to the original 600 square mile area.

Thank you for this opportunity to comment.



Marybeth Holleman  
9138 Arlon Street Suite A3-666  
Anchorage, AK 99507

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

14 pp. total  
FAX: 907-465-6094

**RE: Support for Proposal 58 – expand the Denali wolf protection buffer to its original 600 square miles.**

Dear BOG,

I wish to support your adoption of Proposal 58 from the Anchorage Fish & Game Advisory Committee (AAC). As you know, this proposal would expand the no-take wolf protection buffer on the eastern boundary of Denali National Park.

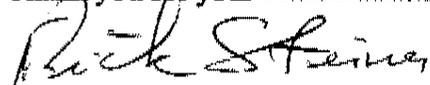
In context with the several other buffer proposals before you, proposal 58 proposes that the buffer be expanded to its original approximately 600 square mile area. It is clear from the attached 2002 research discussion from Dr. Gordon Haber (deceased), that this is the minimum area necessary in order to provide reasonable protection to Denali wolves. The attached map also displays radio collar data from Dr. Haber's research, which shows many wolf locations across this proposed expanded buffer.

From the Haber data, it is obvious that none of the smaller proposed buffers will provide sufficient protection to Denali wolves, and thus I ask that the BOG adopt the buffer proposed in proposal 58.

The Denali buffer issue seems to be a very straightforward allocation issue. Denali wolves are invaluable national assets, worth millions of dollars to the state's tourism economy. As well, their scientific and ecological value is enormous.

It is clearly the highest and best use of this resource to be protected as much as possible, and not allowed to be taken by a few recreational users along the boundary of the Park.

Thank you for your consideration.



Rick Steiner, Professor and biologist  
9138 Arlon St. Ste. A3, Box 666  
Anchorage, AK 99507

attachment

## **Delineating a Protective Buffer Zone for Eastern Denali Wolves**

Gordon C. Haber

October 2002

Introduction	1
Wolf movements	2
Hunting-trapping risk and buffer protection	8
Mobile protection	9
Pitfalls and misconceptions	10
Literature cited	12
Figure 1: Proposed Denali no-wolf-hunting/trapping buffer zone	3
Figure 2: Toklat winter locations, October 1995-April 2001	4
Figure 3: Toklat locations, May 2001-April 2002	4
Figure 4: Sanctuary winter locations, October 1995-April 2001	5
Figure 5: Margaret locations, May 2001-April 2002	5
Figure 6: Sanctuary survivor locations, May 2001-March 2002	6
Table 1: Savage and Toklat winter travel mileages, 1969-1974	6

### Introduction

Full protection from hunting and trapping has long been advocated for the two major “road corridor” groups of wolves in Denali National Park and Preserve. The 63-year-old or older Toklat (East Fork) family lineage and at least four successive groups occupying the adjacent eastern area – Savage, Headquarters, Sanctuary, and Margaret - have provided more viewing opportunities and scientific insight than wolves anywhere else in the world. Yet they are not accorded full protection from hunting and trapping, and losses continue with serious harm to their world-class scientific and viewing values and despite legitimate ethical concerns (Haber 1996, 2002a). Three successive eastern groups - Savage, Headquarters, and Sanctuary – have been terminated over the past 20 years (in 1983, 1995, and 2001) due largely to hunting and trapping, and Toklat has been hit hard at least several times.

In November 1992, the Alaska Board of Game created a no-wolf-hunting/trapping buffer zone of approximately 600 square miles along the northeast and east park boundaries of Denali National Park, to better protect the eastern Denali wolves. However, the Board rescinded this buffer two months later after Gov. Walter Hickel suspended several proposed wolf control programs the Board had wanted for other areas. In November 2000, the Board again agreed that a buffer

was justified but designated only 29 square miles along the northeast park boundary for this purpose. In May 2001 it expanded this to about 90 square miles.

In this report, I consider why the present Board of Game should restore a buffer virtually identical to the one the Board created in 1992 (widened somewhat on its northern end, narrowed on its southern end). The proposed buffer, shown in Figure 1, should eventually also include about 300 square miles of the 1980 national park addition, but this will require separate federal action.

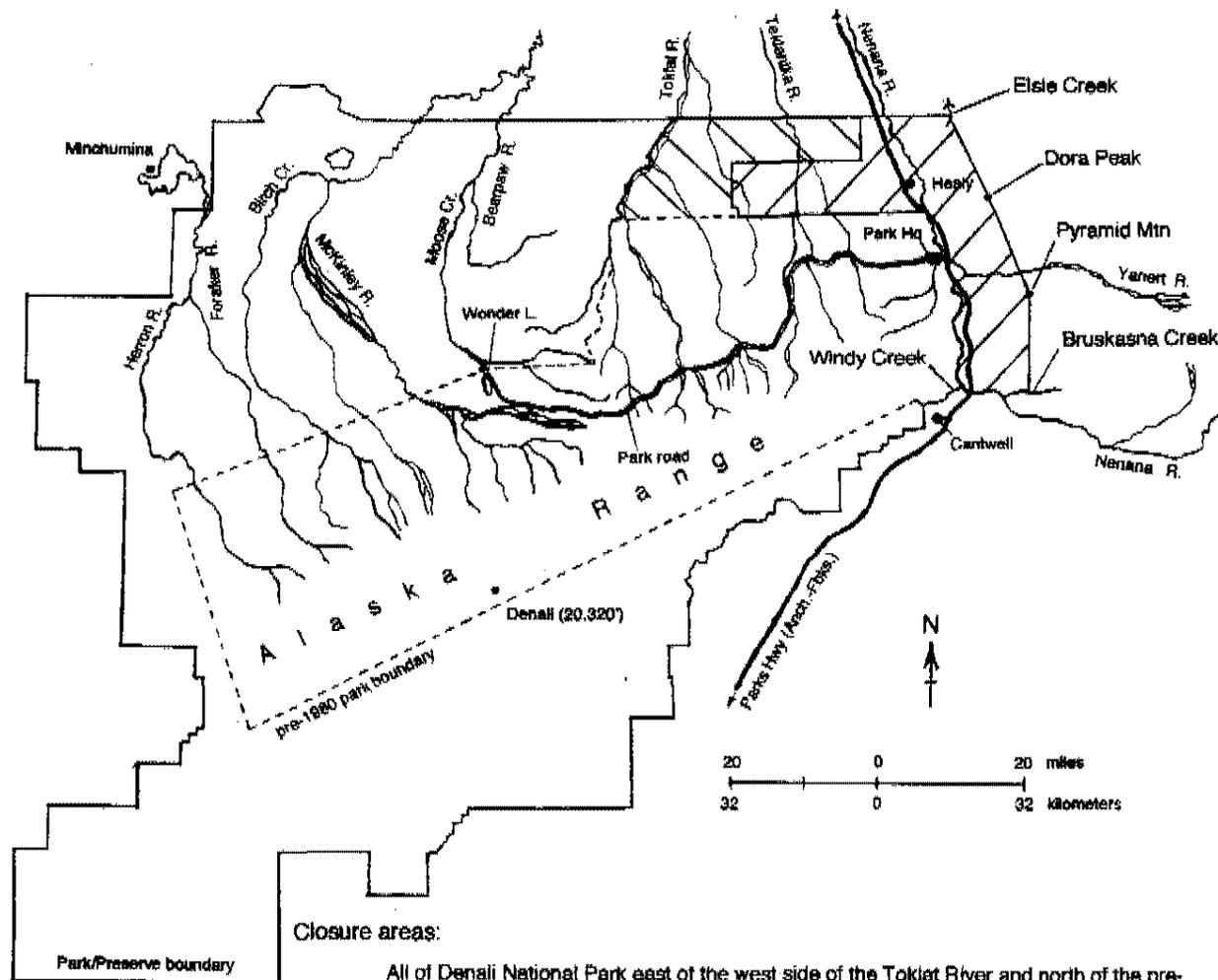
As of this writing (early October 2002), the new eastern group – Margaret – consists of four adult wolves and the six pups they produced in May 2002. I will not know Toklat's status for certain until completing intensive radio tracking surveys in late October. My current observations indicate Toklat's five 2002 pups probably died, due to unknown natural causes, and that there are 4-5 adults at present.

### Wolf movements

To understand why a buffer is needed and how it should be delineated, it is necessary to distinguish among three types of movements: (a) the more-or-less routine, recurring movements that define the "territory" of each group, (b) the unpredictable *extraterritorial forays* by each group well outside these areas, and (c) dispersals, during which certain individuals – most commonly 2-3-year-olds – leave a group (depending on its size and other variables) and do not return, usually because they form/join a new group or die in a distant area.

The third type of movement, (c), is not relevant to the buffer objective; dispersers are "lost" from the original groups with or without a buffer. The two others, (a) and (b), are relevant. Figures 2-6 show the winter radio-tracking locations that I recorded for Toklat, Sanctuary, and Margaret involving these two types of movements from 1995-2002. Table 1 summarizes similar data that I recorded for Savage (a Sanctuary and Margaret predecessor) and Toklat during the same two kinds of movements from 1969-1974. In Figures 2-6, each location represents all radio-collared wolves that were present - e.g., two radio-collared wolves of the same group tracked to the same location at the same time are represented by one dot, not two. Two or more locations are plotted together only if I found the wolves there on separate dates, successive or otherwise. In some cases I tracked the wolves represented by these locations over extended routes for up to 7-10 days; this information is not shown in Figures 2-6. I emphasize that all of the outlying locations shown in Figures 2-6 represent forays from which the wolves returned, usually within a few days to a week; no dispersals are included.

The Table 1 data (Table 37 of Haber 1977) are derived from much longer, continuous sampling intervals, during which I followed and observed each group daily for up to three weeks at



All of Denali National Park east of the west side of the Toklat River and north of the pre-1980 north park boundary (approx.  $63^{\circ} 48.00'N$ )

All other lands abutting the east and northeast boundaries of Denali National Park, within the following boundaries: Commencing at the far northeast corner of Denali National Park and Preserve (at approx.  $64^{\circ} 00.00'N$ ,  $149^{\circ} 13.00'W$ ), thence due east until intersecting Elsie Creek (at approx.  $64^{\circ} 00.00'N$ ,  $148^{\circ} 53.00'W$ ), thence southeastward along a straight line to the top of Dora Peak (at approx.  $63^{\circ} 49.20'N$ ,  $148^{\circ} 41.00'W$ ), thence southeastward along a straight line to the top of Pyramid Mountain (at approx.  $63^{\circ} 38.40'N$ ,  $148^{\circ} 31.00'W$ ), thence due south until intersecting Bruskasna Creek (at approx.  $63^{\circ} 27.00'N$ ,  $148^{\circ} 31.00'W$ ), thence westward (downstream) along the north side of Bruskasna Creek to its confluence with the Nenana River (at approx.  $63^{\circ} 26.10'N$ ,  $148^{\circ} 37.80'W$ ), thence westward (downstream) along the north side of the Nenana River to its confluence with Windy Creek at the east park boundary (at approx.  $63^{\circ} 27.90'N$ ,  $148^{\circ} 49.00'W$ ).

Figure 1. Proposed Denali no-wolf-hunting/trapping buffer zone. Cross-hatching indicates areas that would be closed to wolf hunting and trapping: right = areas outside park lands, left = inside.

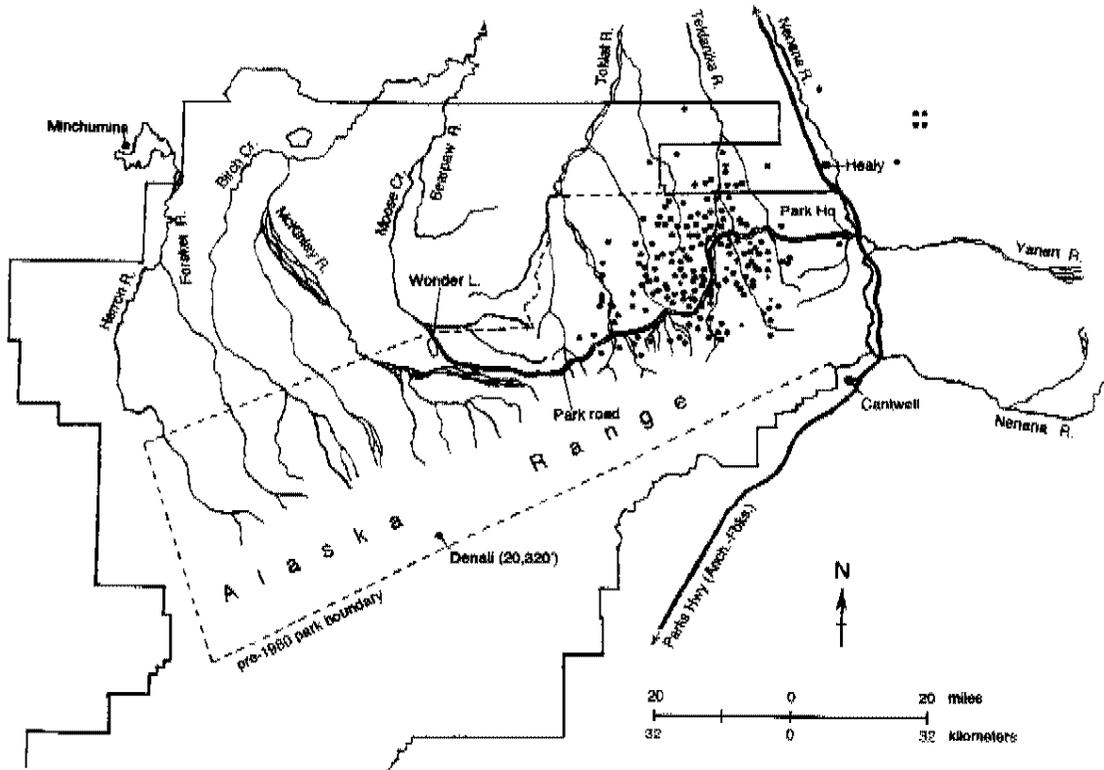


Figure 2. Toklat winter locations, October 1995-April 2001 (171).

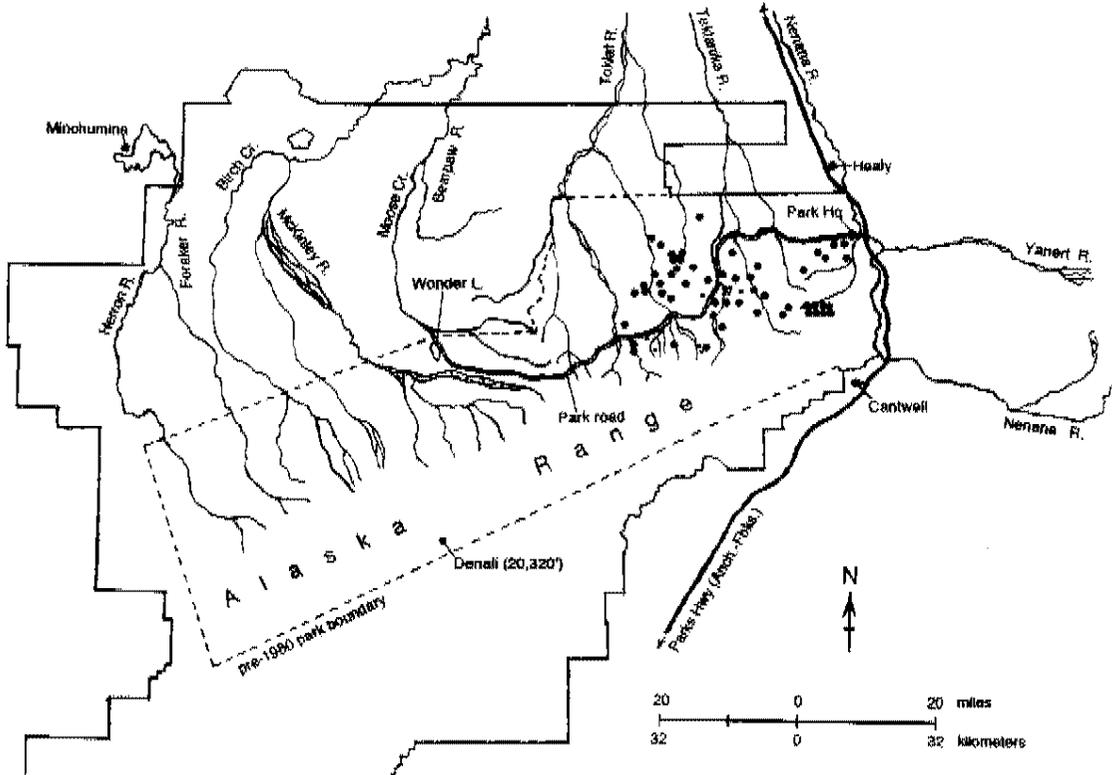


Figure 3. Toklat locations, May 2001-April 2002. Large dots=Oct-April (53), small=May-Sept (10).

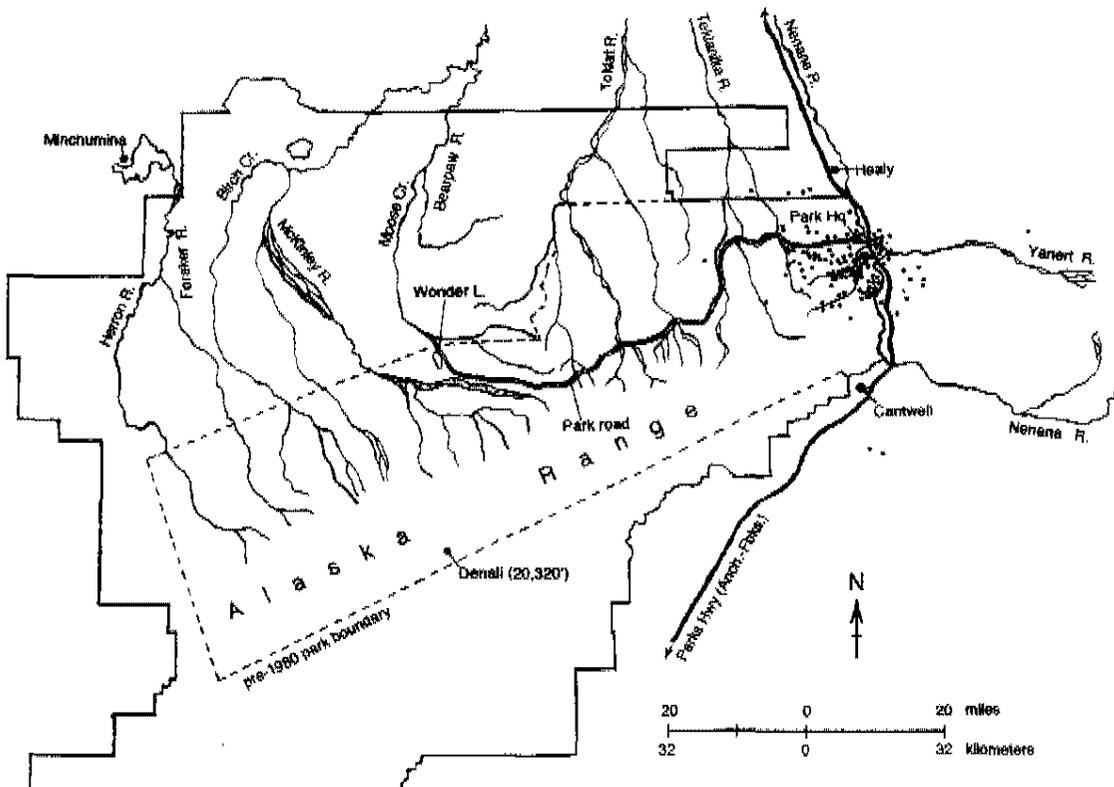


Figure 4. Sanctuary winter locations, October 1995-April 2001 (119).

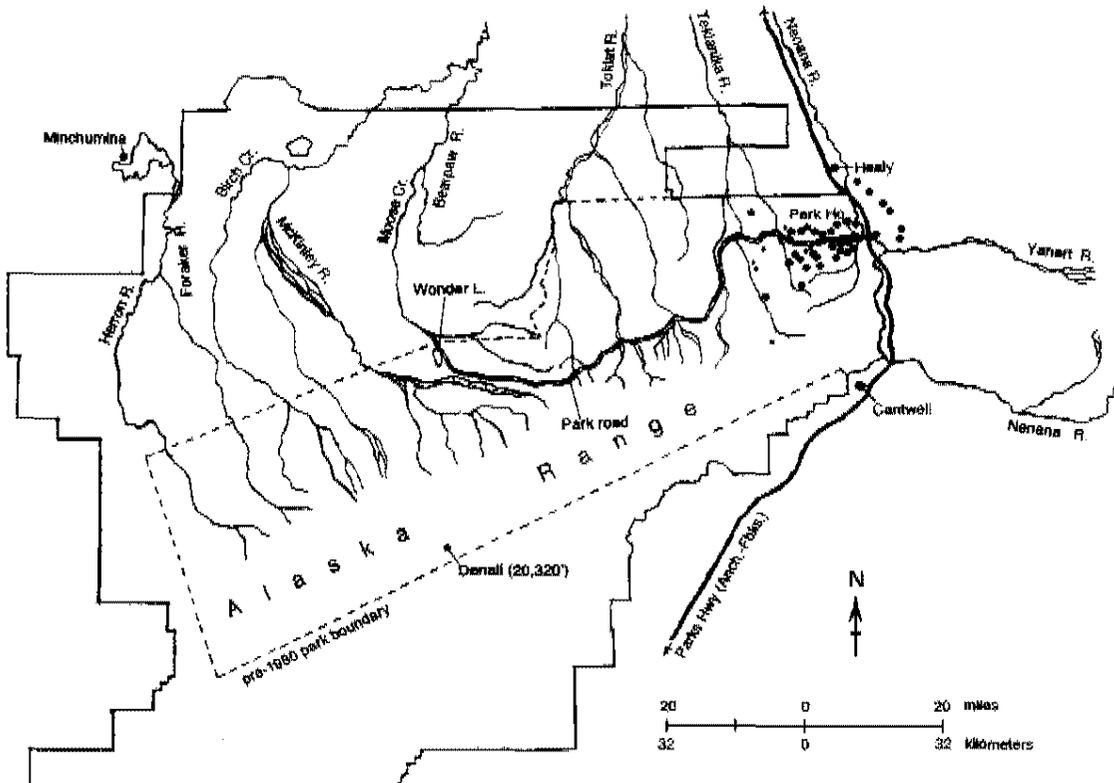


Figure 5. Margaret locations, May 2001-April 2002. Large dots=Oct-April (34), small=May-Sept (7).

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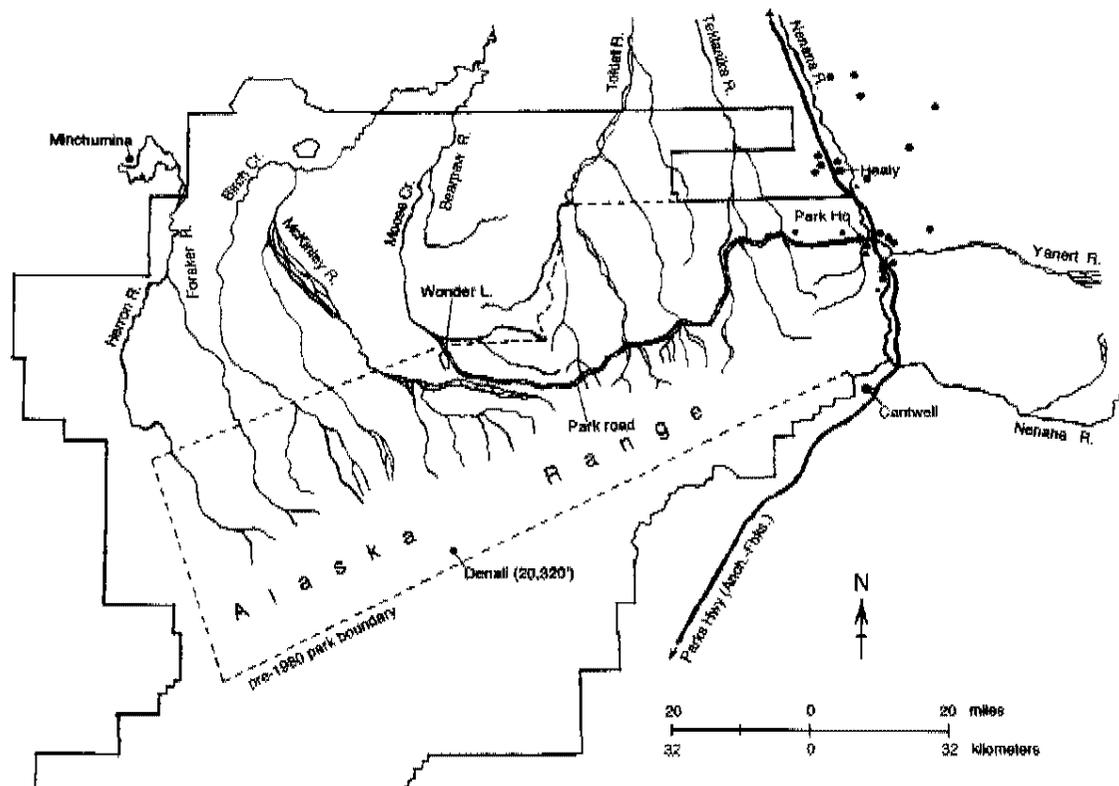


Figure 6. Sanctuary survivor locations, May 2001-March 2002. Large dots=October-March (17), small=May-September (6).

Table 1. Savage and Toklat winter travel mileages, 1969-1974 (Table 37 of Haber 1977).

Winter	<u>Savage – miles traveled</u>				<u>Toklat – miles traveled</u>			
	Inside territory	Outside	Total	Miles per day	Inside territory	Outside	Total	Miles per day
1969-70	269.3	0	269.3	17.3	210.7	48.3	259.0	25.4
1970-71	452.2	16.6	468.8	7.2	169.1	7.9	177.0	13.2
1971-72	288.3	128.7	417.0	10.8	68.1	9.5	77.6	7.9
1972-73	294.6	1.2	295.8	10.3	316.4	21.8	338.2	22.3
1973-74	254.2	6.3	260.5	12.5	102.6	0	102.6	20.2

a time via aerial snow tracking, the method used by researchers and aerial wolf hunters at that time (radio tracking was not yet available).

I have not included most of the summer data from either period of research, because of the wolves' much different routines at that time of the year. During summer, wolves base their activities at dens and rendezvous sites, whereas during winter they range more-or-less continuously as a single group or in varying subunits without any fixed bases. Combining summer and winter data disproportionately weights the overall sample within central areas (where most of the dens and rendezvous sites are located) and thus produces a misleading portrayal of the relationship between central and outlying movements during the winter, when most of the problems occur. There is some travel outside the park boundaries during summer, but this is generally negligible and much less than during winter.

Although the Figures 2-6 vs. Table 1 data are not strictly comparable, both samples illustrate an important aspect of behavior that is critical toward designating buffer zone boundaries: A relatively small but significant and widely-varying portion of the wolves' winter travel, excluding dispersals, is outside their established territories. During these extraterritorial forays, which range from a few miles to 40-50 miles or more and last from 1-2 days to a week or two, an entire family group or a temporary subunit hunts, explores, and/or aggressively pursues wolves from other groups (Haber 1977; Mech et al 1998). Table 1 indicates that from 1969-1974 - a five-winter sample covering a wide range of snow conditions - 9% of all travel (in miles) observed for *both* Toklat and Savage was outside their established territories but with wide variation in the winter-to-winter percentages: 0-19% for Toklat and 0-31% for Savage. Figures 2-4 indicate that from 1995-2002, 13-15% and 13% of my winter radiolocations for Toklat (n=224) and Sanctuary (n=119), respectively, were outside their established territories. The outside-location winter-to-winter variation was 0-32% for Toklat and 7-45% for Sanctuary. Sanctuary's successor, Margaret, recolonized approximately the northern half of the Sanctuary vacancy as of its first winter there (Figure 5). About 18% of its winter radiolocations (n=34) were outside the established (Sanctuary) territory. A female Sanctuary pup survived on her own for 12 months after the other Sanctuary wolves were gone, obviously without much knowledge of the established territory. 65% of my winter radiolocations for her during this period (Figure 6; n=17) were outside the established Sanctuary territory, although she ultimately returned to its eastern area and was trapped there in March 2002.

Figures 2-6 provide an indication of the importance of buffer areas to the two eastern groups relative to the total area that each uses. Buffer usage consists of routine, fairly regular movements within each of the two ("core") territories where these extend somewhat outside the protected park areas *and* sporadic extraterritorial forays (above) further into and through the buffer.

Combining the Figures 2-6 winter radiolocations from both kinds of movements produces overall "buffer-use indices" of 8-9% for Toklat (n=224), 20% for Sanctuary-Margaret (n=153) excluding the Sanctuary pup's locations, and 27% for Sanctuary-Margaret (n=170) including the pup locations.

These indices could change substantially over the next year or two, given that so far Margaret has recolonized only the northern half of the Sanctuary vacancy and much of the rest still seems open to dispute. Toklat's increased eastward probes in winter 2001-02 (Figs. 3 vs. 2) suggest that it may be in the running for a portion of the Sanctuary vacancy. On several of these forays Toklat wolves were within an easy 1-2 hour jaunt of crossing central and southern segments of the east park boundary, into areas of high hunting and trapping danger where at least two successive eastern groups (Headquarters and Sanctuary) were eliminated. This serves as a reminder as to how easily Toklat can get to these dangerous east boundary areas and how closely its safety from hunting and trapping is tied to what happens to the eastern group. Note from Figure 2 the Toklat radiolocations well to the north and east of Healy - in the Ferry, Jumbo Dome, and Usibelli coal mine areas, illustrating that its extraterritorial forays not only can but *do* take it into and through seemingly distant areas of the proposed buffer. Data from earlier years and decades on Toklat, Savage, Headquarters, and other Denali groups show much the same (Haber 1977 and unpubl.; Mech et al 1998), including forays into and beyond southern sections of the proposed buffer.

#### Hunting-trapping risk and buffer protection

It does not follow that drawing a protective buffer around *most* of the Toklat and Sanctuary-Margaret radiolocations shown in Figures 2-6 will eliminate *most* of the hunting-trapping risk for these wolves. The level of risk is not determined only by where the wolves go. It is determined by where they go *with respect to* hunting-trapping access. There are fewer outlying locations, but most of these represent known extraterritorial forays into northeast and eastern areas where the risk increases dramatically because of much higher human activity and easier hunting-trapping access.

The buffer area shown in Figure 1 includes Healy and extends southward almost to Cantwell. Between these two communities and west of Healy there are major residential subdivisions, commercial developments, and numerous individual residences. All of this is tied together along the east park boundary by the Parks Highway and Alaska Railroad, and west of Healy by the Stampede Trail/Road. Snowmachine and ATV access is enhanced by the Anchorage-Fairbanks Electrical Intertie right-of-way, major trails up the Yanert valley, secondary roads and trails in the Dry Creek-Healy-Usibelli-Ferry areas, other roads and trails, the gravel bars of numerous rivers and creeks, and large expanses of open tundra in the northeast boundary area, i.e., the so-called Wolf Townships. The Stampede Trail/Wolf Townships, Yanert valley, and Cantwell areas have become

major snowmachining and dog-mushing destinations, complete with accommodations and weekly snow-condition reports in the Fairbanks Daily News-Miner.

Extraterritorial forays can take Toklat and Margaret unpredictably in almost any direction from their core territories. However, when they cross the northeast and east park boundaries - which becomes more likely because of the lure of traditional caribou wintering activity, the high human activity and easy hunting-trapping access gives special urgency to protecting them. It is relatively easy to identify from Figures 2-5 where the two core territories extend across the park boundaries but impossible to know where, beyond these cores, Toklat and Margaret will go on their next extraterritorial forays. Toklat's next trip outside its established territory might be five miles to the north for two days, or it might be 30 miles to the northeast for a week or two (as in 1999, when all six of the Toklat wolves went northeast to Jumbo Dome [northeast of Healy], then southward through the Usibelli area and to Montana Creek before re-entering the park near the main Parks Highway entrance). Margaret's next foray outside its territory might be 5-10 miles northward to the Healy area (as in March 2002) or 25 miles eastward up the Yanert valley.

The only way to reasonably ensure protection in the face of this unpredictability is to incorporate all of the developed and easily accessible northeast and eastern areas within the buffer, in a way that permits relatively easy field identification of the boundaries. Hence the buffer proposed in Figure 1, which the Board of Game first designated for these reasons (in nearly the same form) in 1992.

There will be continued risk for Toklat and Margaret when they venture north and east of the proposed buffer. However, the buffer is delineated so that it includes the bands of heavy development and easy access along and extending from the Parks Highway and Stampede corridors. The wolves will be legally protected while passing through these areas, and when they exit the north or east sides of the buffer the human activity and hunting-trapping access will have decreased just as dramatically as it increased when they entered on the opposite sides.

#### Mobile protection

The objective is to protect the Toklat and Margaret wolves from hunting and trapping. This can be done primarily with the Figure 1 no-wolf-hunting/trapping buffer. Nevertheless there should be additional flexibility when the buffer is not enough and there is an opportunity to do more. The Board should give the Commissioner of Fish and Game authority to take immediate emergency action to protect Toklat and Margaret (or any successor group) when they are on *any* unprotected state or private lands.

Toklat and Margaret are monitored regularly via aerial radio tracking. It will often be known when they are beyond protected areas. It should often be possible to watch them closely when this happens (as I am already doing). If they are radio tracked to an unprotected area where there is current snowmachine or aerial-assisted trapping activity, the Commissioner should have the authority to issue an immediate emergency order protecting them from shooting and new ground or aerial trapping. If any are caught in previously set traps or snares, the Commissioner should have the authority to immediately release them and provide whatever on-scene veterinary assistance is needed to help ensure recovery from trap or snare injuries. There could be a provision to pay the trapper above market value for wolves thus released, but the key would be fast action and hence authority for the Commissioner to act before the usually difficult process of identifying and contacting the trapper.

These will be rare occurrences. It will be possible to confirm the identity of the wolves and determine that they are not simply dispersing. Hence this kind of mobile protection is unlikely to be "abused" or result in a serious burden for anyone.

#### Pitfalls and misconceptions

It is often assumed that separate buffers can be considered for Toklat vs. Margaret – one buffer along the northeast park boundary for Toklat and another along the east park boundary for Margaret. This is a serious mistake. Per above, the unpredictable extraterritorial forays of each group can extend in both directions. In addition, although Margaret's recent territorial (vs. extraterritorial) movements haven't extended into the northeast area yet, they likely will as recolonization of the Sanctuary vacancy continues. Both the Sanctuary (Fig. 4) and Savage (Haber 1977) territories extended into this area as well as outside the east park boundary. Indeed, Margaret's original territory – for about a year and a half prior to the Sanctuary vacancy – was "wedged" between the Toklat and Sanctuary territories and extended further to the north. Thus, whether the concern is for Toklat, Margaret, or both groups, a buffer including both areas (northeast and east) is needed for effective protection against hunting and trapping.

As also emphasized earlier, it is not possible to delineate an effective buffer based on the *core* radiolocations, because of the disproportionately much higher hunting-trapping risk associated with the outlying locations, however fewer in number they are. This was the flawed reasoning behind the delineation of a 90-square-mile northeast boundary "Toklat buffer" in 2001. The 2001 buffer has also enabled vindictive trappers to focus their revenge along a north-south line (lower Savage River – the east side of the 2001 buffer) right through the middle of a traditional caribou wintering area, where Toklat (and other groups) have hunted in past winters. I monitored a trapline

along lower Savage River in winter 2001-02 but there was unusually low caribou activity. This and Toklat's eastward probes into the Sanctuary vacancy were among the lucky circumstances that forestalled Toklat trapping losses in the lower Savage area for at least one winter.

The Board declined to add any east boundary areas to the buffer in 2001 largely because it felt this would result in heavy habituation of the eastern Denali wolves and problems for east boundary residents. However, most of the contact that these wolves have with people takes place well *inside* the park, such that any additional "habituation" outside is likely to be of secondary importance. More to the point, the bold behavior of Denali wolves around people is typical of what is "natural" and "wild" for this species, probably results much less from habituation than is generally assumed, and has characterized these wolves for at least four decades without evolving into dangerous aggression (Haber 2002b).

An argument often heard in opposition to a Denali buffer is that wolf family groups disappear regularly due to natural causes, and that these mortalities essentially "swamp out" and render insignificant the effects of human-caused mortality. I challenged this argument in detail in Haber (1996, 1998, 1999, 2002a). But perhaps the most obvious counter to it is Toklat's long history, Savage's 17+ years, and the well-documented role of hunting and trapping in the succession of eastern turnovers. In other words, absent hunting and trapping, persistence would more likely be the rule than the exception in eastern Denali. Wolf family lineages ("packs") are the fundamental biological units of a wolf population. There are good scientific, esthetic, ethical, and viewing reasons why, at least in eastern Denali, these should be allowed to survive for however long – years, decades, or longer - natural circumstances alone may dictate in each case.

Another frequent argument is that the buffer is a back-door attempt to expand the park. Park entrance areas inherently attract people, development, and easy access. This usually creates sharp lines of demarcation, with natural conditions prevailing on the inside and development and access just outside. Resident wolves and other wildlife will continue using natural habitats close to the park boundary. Thus it is inevitable that their forays, migrations, etc will take them into areas of human activity and easy hunting-trapping access. The purpose of the proposed buffer is nothing more than to neutralize the negative impacts of this entrance-area activity and access on two especially vulnerable and valued park wildlife groups. The buffer is a response to a problem generated largely by human activity and access, not a back-door attempt to expand the park. It is a logical way to counter resulting hunting-trapping impacts and help to preserve what attracted most of the entrance-area human activity in the first place.

Opponents often imply that there is local subsistence dependency on wolf hunting and trapping in the proposed buffer area. To the contrary, most if not all of the wolf killing within this

area is opportunistic and/or recreational. It is done primarily by a handful of local residents from households with one or more wage earners – not uncommonly earning more than \$50,000 – and by weekend hunters/snowmachiners from Fairbanks and Anchorage. I am a resident of the proposed buffer and know most of the locals who trap or shoot wolves well enough to debunk the notion that any of them will suffer a significant lifestyle or income change if they cannot kill wolves in this area.

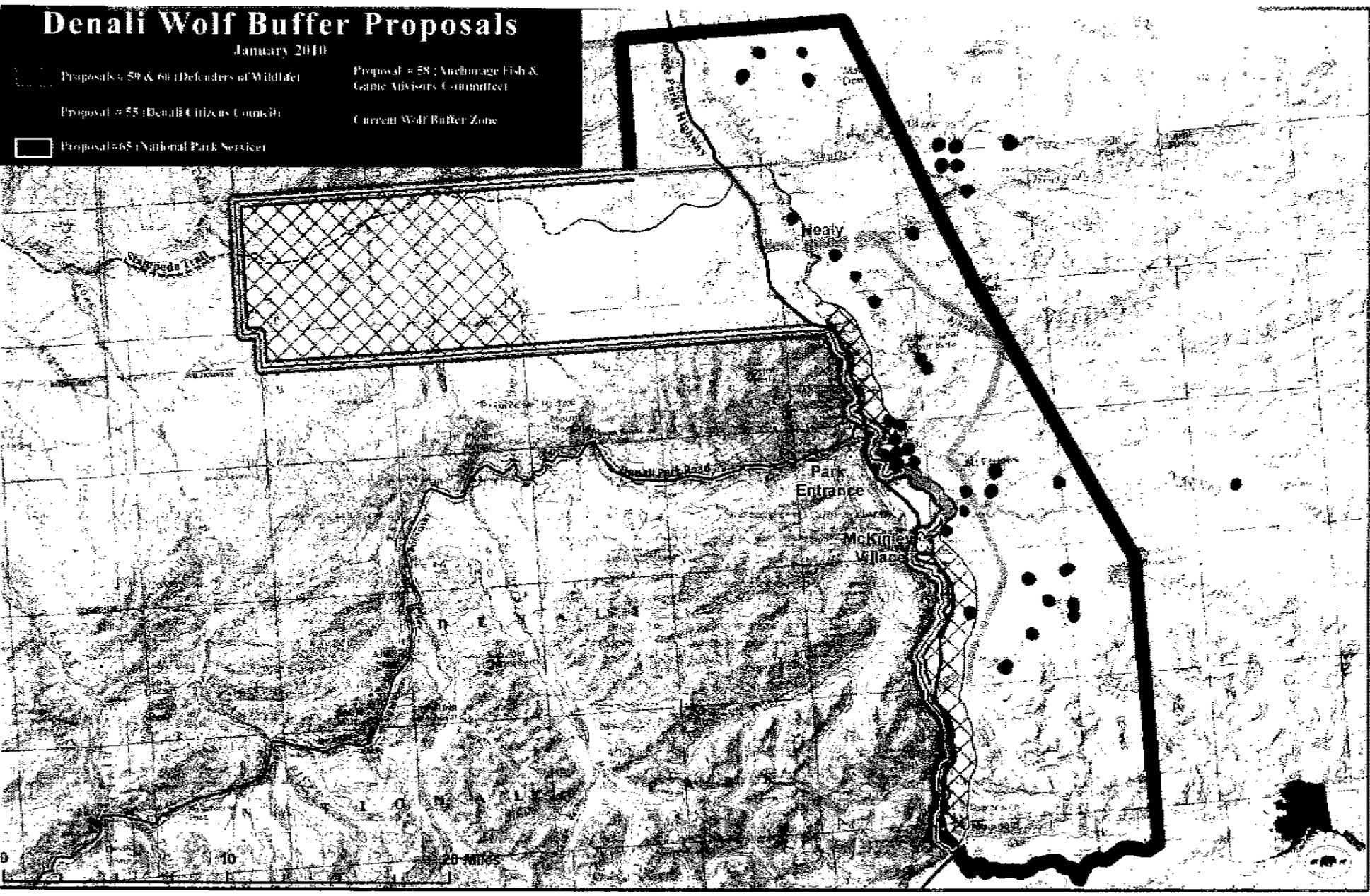
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Locations of radio-collared Denali Park wolves in and near the Nenana Canyon Buffer Area, winters 1995-2002. Data from G. Haber (2002).

PAGE 14

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Comments Region III 2010

Alaska Chapter Wild Sheep Foundation

Comments on Dall sheep regulation proposals:

**Proposal #16: The Alaska Chapter of the Wild Sheep Foundation recommends "Do not pass."**

With all due respect to Alaska WSF Life Member, Tom Lamal's, experience and thoughtful consideration of the Dall sheep harvest situation, the Alaska Chapter of the Wild Sheep Foundation disagrees with his approach to altering the allocation of harvest opportunity throughout Region III via Proposal #16. The Foundation recommends against passage of Proposal #16.

Most basically, Proposal #16 would open the season for Alaska residents only in Region III (the Alaska Range, the Tanana Hills/White Mountains, and the Brooks Range) five days earlier for all Alaska residents than for nonresidents. Other areas in Alaska would not be affected. This "early opening" should be expected to focus increased resident Dall ram hunter pressure on Region III. As a matter of principle, the Alaska Chapter of the Wild Sheep population can't agree that increasing harvest opportunity (through increasing season length) is a good idea when Dall sheep populations are depressed, and legal rams are correspondingly scarce. Even though this change would provide a theoretical advantage to the Alaska Wild Sheep Foundation's Alaska members, we don't think it is a good idea. Here's why:

The Foundation does not support a lengthened season on a struggling resource. Compared to recorded history, Dall sheep populations are thought to be down by as much as 40-50% across Region III. Inviting all resident Dall sheep hunters into this already heavily harvest area does not seem to be in the better interests of Dall sheep populations or our members who revere them. If there is an "aesthetic quality" management objective in the Brooks Range (which there used to be) this action would be inconsistent with the management plan for the area because it should attract hunting pressure to an area where "aesthetic hunting" may already be at risk due to crowding on huntable habitats.

The season length issue is particularly important in the Brooks Range where the five-day increase in open season actually amounts to a very significant (20%) increase in functional season length. Historically, weather closes the sheep season in the Brooks Range early (often prior to September 5). This means the present season length in the Brooks Range is really only from August 10 to Sept. 5 (not Sept. 20). That would be an increase from 25 days to 30 days or an increase of 20 percent in season length. If more resident hunters are attracted to the Brooks Range, already competitively harvested populations will face more pressure for a longer period of time. It only stands to reason that hunt "aesthetics" should decrease while pressure and harvests increase.

Given that there aren't a lot of full curl rams "going to waste" in Region III, it is reasonable to presume that success by "earlier resident hunters" will effectively "take rams away from" those who must hunt later in the season. These nonresident hunters would also suffer an almost 10%

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reduction in season length as well as being disadvantaged by hunting after many rams have been harvested by residents. These nonresidents would be discriminated against by giving residents a season length and timing advantage (see "Tier I" argument below).

If the existing equality of opportunity is disturbed to discriminate against nonresident hunters, it seems likely the revenue generated by nonresident Dall ram hunting in Region III will decline. Because nonresident Dall sheep revenues have always been a major source of dollars for Pittman-Robertson matching funds, actions further decreasing nonresident license and tag sales does not seem to be good Dall sheep conservation. The Alaska Chapter of the Wild Sheep Foundation stands for good conservation, even if altruistically challenged to do so.

Targeting the nonresident hunter for restriction is not new. Residents have traditionally resented nonresident hunters because "*They don't live here, but they have a much higher success rate (about 80%) than we do because they can pay big bucks to a guide.*" Resident success used to average about 35% but is now down to 25% (according to Proposal #16). We presume this decline is due to depleted Dall sheep abundance. Still, residents have always taken the bulk of the harvest (about 60-65%) even though nonresidents took a disproportionately (high) percentage of the harvest for their actual numbers due to their high success resulting from the guide requirement for nonresidents. Even though sheep harvests have declined, the percentages harvested by residents and nonresidents remain about the same (roughly 60:40 in favor of residents). This has "always" been the distribution. (If the allegations of 25% resident success are correct, the math doesn't seem to work out perfectly in this respect.)

Although resident hunters traditionally see themselves as disadvantaged compared to nonresidents, residents typically overlook the cost, season length, and proximity advantages they enjoy by living here. If the Dall sheep portion of our resident hunting license amounts to 10% of its \$25 value (considering a minimum of 10 big game animals may be harvested on it) it costs only \$2.50 per year for an Alaska resident to hunt Dall sheep. A nonresident license costs \$85. That's 34 times as much as the resident license. Then there's the nonresident sheep tag (\$475) which is 170 times the resident cost (calculated from \$2.50). Of course, a nonresident will also have to hire a guide (an additional \$7,000-\$18,000), and can hunt only during the period when the guide is under contract. Any licensed resident can hunt throughout the existing 42-day season, and is not required to have a guide. Any advantage the nonresident enjoys comes specifically from skill and support of his/her guide.

We differ with Proposal #16's assertions of economic impact. From a management funding standpoint, resident hunters provide only 0.5% as much of the per license costs of Dall sheep management and restoration efforts as come from nonresident license sales. We disagree with the Proposal's assertion that the fiscal loss will be insignificant with to nonresident moose and caribou tag sales. If this is a new development, we are unaware of this shift in funding. Based on our historic understanding of the funding balances for Dall sheep and brown bears, we argue that significantly reducing the number of nonresident hunting opportunities (which we argue Proposal #16 would eventually do) will negatively and significantly affect the amount of management money available for sheep (and other wildlife) management and restoration. We do not presently have the resources to accurately predict the revenue losses from Dall sheep license and tag sales, but suggest the Board not accept this proposal until our differences with the



assertions of Proposal #16 have been satisfactorily resolved. We're claiming one thing, Proposal #16 claims another. We don't know which is correct, but trust the Department and Board will determine the correct answer before acting on Proposal #16.

Our Foundation realizes management costs money, and has a strong record of generosity toward management. Naturally, we are concerned with the effect limiting nonresident hunters (which, again, we argue Proposal #16 would do) will have on the overall health and future of Dall sheep populations through the Department's budget. While we are sympathetic to the feelings of our resident sheep hunting members, we urge the Board to be cautious in restricting nonresident hunters via this oblique mechanism.

The Foundation also notes that if Proposal #16 eventually restricts nonresident hunters (as we argue it will given there is not a sufficient surplus of mature rams for harvest throughout Region III to absorb the increased hunter pressure we project) the Board will have enacted a *de facto* "Tier I" approach to allocation of Dall sheep harvest opportunities in Region III for a species purposefully excluded from Alaska's subsistence law when it was passed. We don't even want to think about the problems associated with such an action.

The Alaska Chapter of the Wild Sheep Foundation recommends against passage of Proposal #16, and for a **more coordinated statewide approach** to Dall sheep management than presently exists.

Wayne E. Heimer  
President, Alaska Wild Sheep Foundation

**Proposal #23: The Alaska Chapter of the Wild Sheep Foundation recommends caution in consideration of Proposal #23.**

①

The Foundation is nervous about Proposal #23 because it doesn't make a lot of sense to us in light of the history and recent changes in the TMA. If it is necessary to lower the number of permits to meet a reasonable horn size goal in a trophy area, we're OK with that. However, there is something in the progression of TMA regulations that doesn't make too much sense to us.

Last time around the Board split the TMA season into two segments. That will give the guides two openers, which should increase the harvest (maybe even the harvest of larger rams if they are there). We also think splitting the seasons should have been expected to increase permit utilization (more hunters). As we recall, the split season was a proposal from a guide (which we think ADF&G supported because of alleged crowding complaints compromising the TMA's secondary goal of "aesthetics"). Now, ADF&G is moving to reduce the number of permits because they're apparently not quite meeting the "40-inch class" rams goal of 7-10 percent.

Not only do we suggest the earlier action of splitting the season (which we think should have increased the harvest—by guides if not by more resident hunters) is seemingly at odds with meeting the "40-inch class" objective, we're concerned that the "40-inch class" objective may be too optimistic. When the TMA was established in 1974, our objective was 7-10% of the harvest being above **39 inches** (not 40 inches). Until fairly recently (over the length of the TMA's existence) this goal was generally met. We don't know when the goal was revised upward to "40 inches," but this seems an odd thing to do when the population was declining. We argue the goal could never have been consistently met if originally set at "40-inches." We don't think that is nearly as practical as the "above 39 inches" goal originally extant in the TMA. Raising the size-percentage goal with fewer sheep would seem to assure failure to meet the size-percentage goal.

We urge the Board to encourage the Department to deal with this intuitively unreasonable standard before passing this proposal. We wonder if the goal were still "above 39" if the percentage would rise to meet this formerly-defined standard of management success?

We argue the chances of shooting a ram that is "above 39" are significantly greater than taking one with that "one little inch" it takes to be 40 inches. Managers who established the original goals for the TMA recognized this and chose "above 39" accordingly. We argue that the goal has been changed to be impossibly high. If this is the case, cutting back the permit numbers might not be likely to affect attaining the size/percentage goal because the goal is unrealistic.

If there simply aren't large old rams present because of a general population decline, we question the biological relevance of trying to force attainment of a biologically impossible goal by cutting permits. It doesn't seem a management-rational argument on its face.

Consequently we ask the Board and Department to consider which is better management, cutting permits to meet a seemingly unreachable arbitrary goal when the rams to meet it simply aren't there, or letting more people hunt while we hope (with no management intervention) to grow



more larger rams? The Foundation is not satisfied with our ability to rationalize this sequence of hunting season/size-percentage/opportunity adjustments. We would welcome credible data to help us understand the apparently intuitive rationale which troubles us.

Wayne E. Heimer  
President, Alaska Wild Sheep Foundation

## Alaska Game Board

## Region III Interior Alaska

## Proposal 16 5AAC85055 Hunting Seasons and Bag Limits

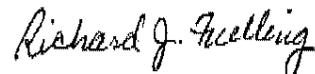
- Resident August 5 – Sept. 20
- Non – Resident Aug 12 – Sept. 20

## To Whom It May Concern:

I support this proposal. I have been a resident of Alaska Since 1972and started hunting Dall Sheep in 1978.To me, and now to my son Mathew, sheep hunting is the ultimate hunting adventure. When we are sitting upon a mountain top overlooking the valley, we like to think we are the only people around. And sometimes we are. Those times are getting to be fewer and fewer however, with the numbers of sheep hunters going up, especially the first few weeks of the season.

Sheep hunting is big business and big dollars to some people, which in turn often transform into quantity of hunts and hunters instead of quality. My son and I hunt Dall Sheep because we love the whole aspect of it. We are full time, year around Alaskans and I believe that fact should come with a few benefits for all full time Alaskans when it comes to fishing and hunting regulations. Proposal 16 would take a step in doing that for the resident hunter of Alaska. I understand that hunting and fishing by non-residents contribute to our state's economy, but I don't think decisions should always be about the money.

Respectfully,



Richard Fuelling

308 Snowy Owl Lane

Fairbanks, AK 99712

February 11, 2010

ATTN: Board of Game Comments  
ADF&G  
Boards Support Section  
PO Box 115526  
Juneau, AK 99811-5526

To the Board of Game:

Alaska is my home. I have lived here for 32 years. What makes it so special is the opportunity to view wildlife year after year.

I support Proposals 55, 58, 59, 60, and 65. I support retention of the current Denali National Park buffers designed to protect Denali wolves AND support expansion of the buffers. The buffers serve a greater good than allowing the hunting and trapping of these wolves. Tens of thousands of visitors to DNP are drawn there by the prospect of seeing wolves. In addition, they have long term scientific value being some of the most studied wolves in Alaska.

I oppose Proposals 56, 57, 61, 62, 63, and 64 which would eliminate the buffers adjacent to DNP.

I oppose Proposal 33. How does it make any sense to allow a cow moose with a calf to be hunted, making it legal to kill the cow and her calf? This proposal is for an area where there is already wolf control and bear control; allegedly that means there aren't enough moose to satisfy hunters right now. This proposal is absolutely nonsensical.

I oppose Proposal 132. It is unclear why there is suddenly such an urgent need for wolf control on Unimak Island and to start it this year. It is interesting this proposal from ADF&G did not also recommend bear control; a guided brown bear hunt on Unimak Island runs \$10,000 - \$20,000 so ADF&G would have riled up the guides had they done that.

Thank you for the opportunity to comment. I hope my comments are considered with the same respect in which they are submitted.

Sincerely,

Marilyn Houser  
Anchorage

Alaskan Board of Game,

I am writing this letter in **opposition** to proposals 56,57,61,62,63 and 64. Denali's Toklat wolves, the most studied and viewed wolf pack in the world, are being trapped as they migrate outside the Park boundary following their winter prey. This opportunistic trapping, some of which is being conducted by seasonal contract employees of the Park Service These employees use their "insider knowledge" of the wolf packs' movements to set their traps at prime locations just outside the Park boundary. Hundreds of thousands of visitors travel to see these wolves every year. Tourism as you know is a multi-billion dollar business to Alaska. In a time of a severe recession it is extremely unwise to do anything to impair this attraction. When people hear this trap and kill of wolves, it turns them off to visiting the park and Alaska as well. I know it bothers me and I am one of those tourists. When my wife and I and our two girls visit Alaska we generate a lot of income for your state. The American tourist doesn't like the idea of park employee's hiding in the bushes at the edges of the park waiting to kill a wolf. I really don't understand why you would want the bad press. I also want to let you know I **support** proposals 55,58,59,60 which seek to expand the buffer zone.

Thanking you in advance,  
Mark Balitzer  
San Diego, Ca

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

To Whom It May Concern:

Hi,

We are writing to support proposals 55, 58, 59, 60 and 65.

We support expansion of the current buffer zone adjacent to the Denali National Park boundary.

We oppose to proposals 56, 57, 61, 62 and 64 that seek to shrink or eliminate the current buffers, thereby allowing trapping right up to the Park boundary.

Our family was planning to travel the Park road in hope to see wolves and observe them with our kids. It is terribly to allow trappers to target the Park wolves. 30 percent of Park wolf mortality is human caused through trapping and shooting.

These proposals seeking to expand the buffer zones are modest and extend the protected zone for wolves by less than ten miles.

There are many millions of acres of land outside the proposed buffers where wolf trapping and hunting are legal.

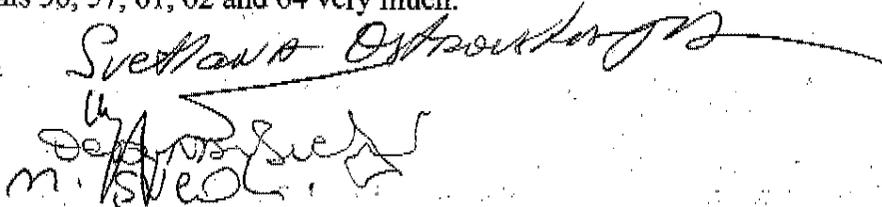
Few individuals would be impacted by and expanded buffer zone. There are only about five trappers targeting these wolves on the Park border.

Expanded buffer zones would be a great memorial to Gordon Haber, a wildlife biologist who spent a lifetime studying Denali Toklat wolves and was a tireless advocate for expanded buffer zones around the Park. He died in a tragic plane crash while tracking these wolves last fall.

We are asking to allow proposals 55, 58, 59, 60 and 65.

We oppose to proposals 56, 57, 61, 62 and 64 very much.

Svetlana Ostrovskaya  
Yakov Sverdlov  
Deanna Sverdlov  
Masha Sverdlov



14 Roland Street,  
Newton, MA 02461

2/6/2010

RECEIVED

FEB 12 2010

BOARDS  
ANCHORAGE

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

*Attn: Scott*  
*BOG Interior*  
*Public Comment*

To Whom It May Concern:

Hi,

We are writing to support proposals 55, 58, 59, 60 and 65.

We support expansion of the current buffer zone adjacent to the Denali National Park boundary.

We oppose to proposals 56, 57, 61, 62 and 64 that seek to shrink or eliminate the current buffers, thereby allowing trapping right up to the Park boundary.

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*P/qz*

We are asking to allow proposals 55, 58, 59, 60 and 65.

We oppose to proposals 56, 57, 61, 62 and 64 very much.

Svetlana Ostrovskaya

Yakov Sverdlov

Deanna Sverdlov

Masha Sverdlov

14 Roland Street,

Newton, MA 02461

[Music2116@yahoo.com](mailto:Music2116@yahoo.com)

617-630-0000

R-282  
PC 83

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

Fax 907-465-6094

Dear Board of Game,

I support expanding the NO KILL buffer zone north of Denali National Park. These include proposals 55, 58, 59, 60 and 65. I would be most in favor of the largest buffer expansion.

When Denali National Park was created in 1917, no one understood the importance of this area in maintaining the integrity of the Park's ecosystem.

Denali National Park is a magnet for tourism and one of the few places on earth average people might see a wolf. Between Dr Adolf Murie and Dr. Gordon Haber, these wolves have been studied for over 80 years and have significant value to science.

The bottom line; these wolves are of more value to more people if left alone. The few recreational trappers who use the area, have other options available to them.

Sincerely,



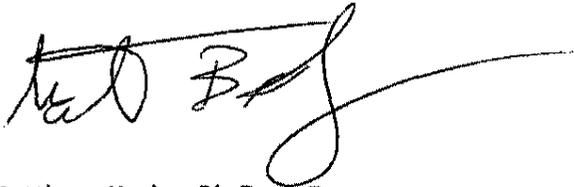
Johnny Johnson  
3705 Arctic Blvd #881  
Anchorage, AK 99503

February 10, 2010

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

This letter is in **support of proposals 55, 58, 59, 60 and 65** to protect and expand the buffer zone near Denali National Park for the protection of the main migratory range of Denali wolves. This letter is in **opposition to proposals 56, 57, 61, 62, 63, 64 and 66**, which seek to eliminate the protection zones around Denali and allow wolf trapping. Specific comments are provided below for each proposal. I have also included copies of the 4 scientific articles cited as supporting evidence in the statements below.

Respectfully,



Matthew Kerby, Ph.D., P.E.  
Belmont, CA 94002

Attachments:

1. *Ecology. Aspens return to Yellowstone, with help from some wolves.*, Science. 2007 Jul 27;317(5837):438-9.
2. *Endangered species. Wolves at the door of a more dangerous world.*, Science. 2008 Feb 15;319(5865):890-2.
3. *Conservation biology. Research wolves of Yellowstone killed in hunt.*, Science. 2009 Oct 23;326(5952):506-7.
4. *Gray wolves not out of the woods yet.*, Science. 2010 Jan 1;327(5961):30-1.

**Proposal 55 - SUPPORT**

The existing wolf protection zones were established in 2004 in recognition of Denali wolf migration patterns. These migratory patterns, justified with radio tracking data, will continue to exist based on geographic protection of wolf prey species in winter. A strict closure, even for coyote trapping, is warranted based on scientific data (Science 319, p890, 15FEB2008)

**Proposal 58 – SUPPORT**

The restriction on coyote trapping in these zones due to wolf capture is warranted and supported by the scientific literature. (Science 319, p890, 15FEB2008)

*Denali wolves are a valuable tourism resource.* As a tourist, I have traveled to the Galapagos National Park to photograph animals of all types, who showed little fear of humans. This once-in-a-lifetime experience was made possible by the dedication to and protection for these special islands.

As a parallel example, Yellowstone's Lamar valley also contains an active pack of wolves that were estimated to bring in a minimum of \$35 million to the local economy (Science 326, p506, 23OCT2009). With an estimated Yellowstone park population of 171 wolves, each wolf could then be said to have a tourist value of over \$200,000. My wife and I climbed a bluff overlooking the Lamar valley to speak with a wildlife biologist, who was radio-tracking the pack and explaining their movements to identify probable locations where we might view wolves. Although we spent several hours driving and hiking, we never saw the wolves. The howling, however, let us know we were close. We plan to travel to Denali also to photograph these wolves, which make themselves visible to humans in their native environment. Denali wolves are viewed by more visitors than any other natural wolf-viewing location.

**Proposal 59 - SUPPORT**

This letter is in **support of proposal 59 to protect and expand the buffer zone near Denali National Park for the protection of the main migratory range of Denali wolves.** These human-habituated wolf populations represent a rare and valuable resource for scientific study and valuable tourist attraction. Scientific studies using GPS radio collars have shown that the wolves cross the Denali park borders in the winter months in search of food. The active range of the Denali wolves, as supported by GPS tracking data, should be used as the criteria for defining the no-trapping buffer zone.

*Trapping is bad for science.* As scientific evidence to gauge the effects of wolf trapping outside of a national park, the following studies reference a population of Yellowstone wolves that also migrate beyond park boundaries. In 2008, the gray wolf lost endangered species status. In October 2009, during the first legal wolf-hunting season, a radio-collared alpha female 527F was killed. Her killing destroyed 5 years of data and field research on wolf/prey interactions costing over \$480,000. (Science 326, p506, 23OCT2009) This wolf, and others from her pack, were more susceptible to hunters because of acclimation to benign humans. These wolves are also caught in coyote snares that cause loss of limbs and death. (Science 319, p890, 15FEB2008) By extrapolation from these studies, wolf and coyote trapping should be prohibited in the protection zones adjacent to Denali.

### Proposal 60 –SUPPORT

This letter is in **support of proposal 60 to protect and expand the buffer zone near Denali National Park for the protection of the main migratory range of Denali wolves.** These human-habituated wolf populations represent a rare and valuable resource for scientific study and valuable tourist attraction. Scientific studies using GPS radio collars have shown that the wolves cross the Denali park borders in the winter months in search of food. The active range of the Denali wolves, as supported by GPS tracking data, should be used as the criteria for defining the no-trapping buffer zone.

*Trapping is bad for science.* As scientific evidence to gauge the effects of wolf trapping outside of a national park, the following studies reference a population of Yellowstone wolves that also migrate beyond park boundaries. In 2008, the gray wolf lost endangered species status. In October 2009, during the first legal wolf-hunting season, a radio-collared alpha female 527F was killed. Her killing destroyed 5 years of data and field research on wolf/prey interactions costing over \$480,000. (Science 326, p506, 23OCT2009) This wolf, and others from her pack, were more susceptible to hunters because of acclimation to benign humans. These wolves are also caught in coyote snares that cause loss of limbs and death. (Science 319, p890, 15FEB2008) By extrapolation from these studies, wolf and coyote trapping should be prohibited in the protection zones adjacent to Denali.

### Proposal 65 – SUPPORT

This letter is in **support of proposal 65 to protect and expand the buffer zone near Denali National Park for the protection of the main migratory range of Denali wolves.** These human-habituated wolf populations represent a rare and valuable resource for scientific study and valuable tourist attraction. Scientific studies using GPS radio collars have shown that the wolves cross the Denali park borders in the winter months in search of food. The active range of the Denali wolves, as supported by GPS tracking data, should be used as the criteria for defining the no-trapping buffer zone. The restriction on coyote trapping in these zones due to wolf by-catch is warranted and supported by the scientific literature. (Science 319, p890, 15FEB2008)

*Denali wolves are a valuable tourism resource.* As a tourist, I have traveled to the Galapagos National Park to photograph animals of all types, who showed little fear of humans. This once-in-a-lifetime experience was made possible by the dedication to and protection for these special islands. As a parallel example, Yellowstone's Lamar valley also contains an active pack of wolves that were estimated to bring in a minimum of \$35 million to the local economy (Science 326, p506, 23OCT2009). With an estimated Yellowstone park population of 171 wolves, each wolf could then be said to have a tourist value of over \$200,000. My wife and I climbed a bluff overlooking the Lamar valley to speak with a wildlife biologist, who was radio-tracking the pack and explaining their movements to identify probable locations where we might view wolves. Although we spent several hours driving and hiking, we never saw the wolves. The howling, however, let us know we were close. We plan to travel to Denali also to photograph these wolves, which make themselves visible to humans in their native environment. Denali wolves are viewed by more visitors than any other natural wolf-viewing location.

#### Proposal 56 – OPPOSE

The criteria to support this proposal is only the “viewability” of wolves without regard to the known scientific range of the animals. The proposal will put the Denali wolf population at risk from trappers during the winter migration. The artificial borders of Denali do not protect the winter wolf migration. The proposal asserts, without evidence, that the closures are “not biologically sound” yet the text of the proposal admits that “quite a few more wolves use this area.” The abolition of the closure will result in an easy kill zone for trappers.

#### Proposal 57 – OPPOSE

This proposal seeks to increase the moose population by harvesting predators. While the proposal assumes that denser populations of moose are better, scientific studies do not validate this assumption. Studies of the reintroduction of wolves to the Lamar valley of Yellowstone show that foundation plant species, such as aspen, recovered from overbrowsing by elk. (Science 317, p438, 27JULY2007) The recovery of these aspen in turn benefited song bird species and slowed erosion of soil into streams, which negatively impact fish populations. This proposal omitted these potential harms. No justification for valuing moose population over wolf population is given in this small protection zone region. No consideration of the negative impacts of increased moose population is given.

#### Proposal 62 – OPPOSE

This proposal, by self admission, lacks scientific data to back the claims of “low populations” of game animals “of course this is based on estimates and extrapolations, as there are no surveys conducted in this area” This proposal seeks to increase the moose population by harvesting predators. While the proposal assumes that denser populations of moose are better, scientific studies do not validate this assumption. Studies of the reintroduction of wolves to the Lamar valley of Yellowstone show that foundation plant species, such as aspen, recovered from overbrowsing by elk. (Science 317, p438, 27JULY2007) The recovery of these aspen in turn benefited song bird species and slowed erosion of soil into streams, which negatively impact fish populations. This proposal omitted these potential harms. No justification for valuing moose population over wolf population is given in this small protection zone region. No consideration of the negative impacts of increased moose population is given.

#### Proposal 63 - OPPOSE

The criteria to support this proposal is only the “viewability” of wolves without regard to the known scientific range of the animals. The proposal will put the Denali wolf population at risk from trappers during the winter migration. The artificial borders of Denali do not protect the winter wolf migration. The proposal does not quantify the amount of time that the Denali wolves use this region but rather only says “very little”. The key point is that the Denali wolves represent a valuable scientific resource that is diminished in value with every wolf kill. No evidence is provided to support the purported “quality for local hunters and trappers” over the documented harm to scientific studies. (Science Vol319, p.890, 15 FEB 2008)

**Proposal 64 – OPPOSE**

This proposal asserts that there is “no biological reason” to protect wolves from harvest but does not offer any scientific evidence in support. However, several scientific studies directly supply a biological reason contrary to this proposal. GPS collar studies indicate the biological need to migrate out of the park in search of prey species during winter. Harvest of radio-collared wolves destroys the value of expensive scientific studies. (Science Vol319, p.890, 15 FEB 2008)

While the proposal assumes that a reduction of predator species is beneficial, scientific studies do not validate this assumption. Studies of the reintroduction of wolves to the Lamar valley of Yellowstone show that foundation plant species, such as aspen, recovered from overbrowsing by elk. (Science 317, p438, 27JULY2007) The recovery of these aspen in turn benefited song bird species and slowed erosion of soil into streams, which negatively impact fish populations. This proposal omitted these potential harms. No consideration of the negative impacts of removing wolves is given. This proposal is hostile to wolf existence and mirrors public attitude rather than sound biological science. (Science Vol327, p.30, 1JAN2010)

**Proposal 66 - OPPOSE**

This proposal seeks to increase the moose population by harvesting predators. While the proposal assumes that denser populations of moose are better, scientific studies do not validate this assumption. Studies of the reintroduction of wolves to the Lamar valley of Yellowstone show that foundation plant species, such as aspen, recovered from overbrowsing by elk. (Science 317, p438, 27JULY2007) The recovery of these aspen in turn benefited song bird species and slowed erosion of soil into streams, which negatively impact fish populations. This proposal omitted these potential harms. No justification for valuing moose population over wolf population is given in this small protection zone region. No consideration of the negative impacts of increased moose population is given.

## NEWS OF THE WEEK

## SEISMOLOGY

## Quake Underscores Shaky Understanding of Ground Forces

**TOKYO**—An earthquake that roughed up a nuclear power plant last week has Japan once again debating nuclear safety. The ground shook with unanticipated fury, prompting some seismologists and citizens' groups to claim that many, if not most, of Japan's 55 operating nuclear power plants are disasters waiting to happen. Structural engineers defend current design practices, noting that the main buildings of the nuclear plant, 16 kilometers from the epicenter, were not damaged. But they agree that research is needed to clarify how buildings respond to earthquake forces.

The magnitude-6.6 Niigata Prefecture Chuetsu-Oki Earthquake struck just offshore beneath the Sea of Japan about 455 kilometers northwest of Tokyo on 16 July, killing 10, injuring 1800, and leaving more than 10,000 homeless. The damage—largely confined to older wooden structures known to be vulnerable to earthquakes—would be unre-

markable if it did not extend to the Kashiwazaki-Kariwa Nuclear Power Plant.

Safety mechanisms automatically shut down the operating reactors, and the reactor buildings appear to have been undamaged. But plant owner Tokyo Electric Power Co. (TEPCO) has detailed a catalog of woes, including broken piping, buckled pavement, a fire that engulfed a transformer, and leaks of trace amounts of radiation.

Most alarming to experts is that the impact on the nuclear plant may have been greater than what it was nominally designed to withstand. It was once thought that the forces imposed on a structure vary more or less linearly with an earthquake's magnitude and distance from the epicenter. But evidence has accumulated that accelerations can be higher than expected because of local geological conditions. According to data released by TEPCO, designers expected peak ground accelera-

tions of about 270 galileo (gravity's acceleration is 980 galileo); last week, accelerations at the base of one of the reactor buildings hit 680 galileo.

"This clearly shows the insufficiency of the old guidelines for power plants," says Katsuhiko Ishibashi, a seismologist at Kobe University. Guidelines issued last September, although an improvement, do not go far enough in basing design loads on ground accelerations, he says.

Still, the relation between ground accelerations and the loads imposed on buildings "is not fully understood," says Toshimi Kabeyasawa, a structural engineer at the University of Tokyo's Earthquake Research Institute. He notes that during a 1993 earthquake that struck Japan's Hokkaido Island, instruments recorded ground accelerations exceeding the force of gravity, or at least three times the loads that buildings would have been designed to withstand under the latest code. But there was very little damage to structures.

The earthquake design load, defined as a percentage of a building's weight applied horizontally, has not changed significantly since it was set after the 1923 quake that destroyed Tokyo, says Shunsuke Otani, a ▶

## ECOLOGY

## Aspens Return to Yellowstone, With Help From Some Wolves

To grow a healthy stand of aspen trees, you need a pack of wolves. That's the conclusion of two researchers who have been studying aspens (*Populus tremuloides*) in Yellowstone National Park. The trees, which are long-lived clones that endure for centuries and possibly millennia, had not regenerated in the park for more than a half-century but are now returning in some areas. Their recovery, the researchers say, is not simply because the wolves are hunting the aspens' archenemy, the elk (*Cervus elaphus*); it's also because the wolves have reintroduced the fear factor, making the elk too nervous to linger in an aspen grove and eat. The study adds to other research linking the 1995 return of the park's key predator, *Canis lupus*, to a more biologically diverse and healthier ecosystem. It also lends strength to the notion that the loss of top carnivores leads to degraded environments overall.

"This is exciting because it lends support to a prediction made a decade ago that the aspen in Yellowstone would recommence growing" after the gray wolf was brought back and began to reduce the elk population,

says Michael Soulé, an emeritus ecologist at the University of California, Santa Cruz. But that is only part of the story, say ecologist

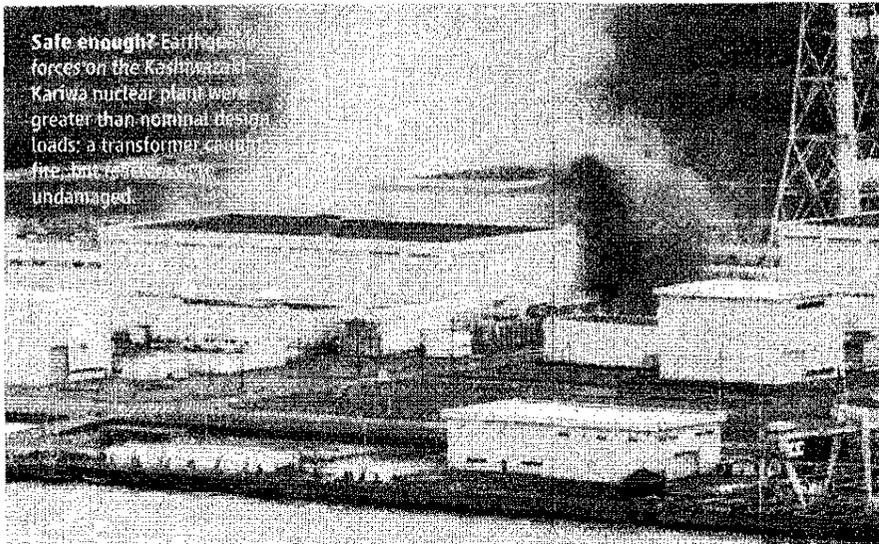


**Trophic cascade.** Reintroducing key predators, like the wolf in Yellowstone National Park, can reestablish healthy ecosystems.

William Ripple and forest hydrologist Robert Beschta of Oregon State University, Corvallis. Their study, which focuses on the aspens in Yellowstone's Lamar Valley, appears in the August issue of *Biological Conservation*.

Beschta recalls being "just aghast" when he first saw the Lamar Valley in 1995. "I used a very emphatic, unprintable word," he says. "This valley lies in what is supposed to be the crown jewel of our national parks, and it was being eroded away" as the Lamar River flooded annually, washing away soils that had taken thousands of years to accumulate. The reason: There were hardly any bushes or trees to keep the soil in place. Back at Oregon State, Beschta presented his mystery: Why were the aspens, cottonwoods, and willows in Yellowstone disappearing? Beschta lacked the time to begin such a study, so his colleague, Ripple, and a graduate student, Eric Larsen, took on the job in 1997.

By examining tree rings, Ripple and Larsen found that the park's aspens had stopped regenerating soon after the 1920s—almost exactly the same date that the U.S. government eliminated the gray



**Safe enough?** Earthquake forces on the Kashiwazaki-Kariwa nuclear plant were greater than nominal design loads; a transformer cooling line, but the reactor was undamaged.

structural engineer at Chiba University. Nevertheless, buildings are safer thanks to a better understanding of how structures can hold up against horizontal forces. "It is not right to judge structural performance by the acceleration amplitudes of ground motion alone," Otani concludes.

The fact that buildings at Kashiwazaki-Kariwa withstood higher-than-anticipated loads indicates they were designed and

constructed well, says Tomotaka Iwata, a geophysicist at Kyoto University's Disaster Prevention Research Institute. "But no one knows just how safe they are," he says. The more immediate issue, Iwata and others say, is the obvious design flaws of the damaged piping systems and secondary structures, which have put Kashiwazaki-Kariwa out of operation for at least a year.

—DENNIS NORMILE

wolf from Yellowstone. "It just boggled my mind to think that wolves could affect a river system," says Beschta. "But the trees were clearly being overbrowsed by elk. To stunt a cottonwood or aspen, all an elk has to do is browse the leader," or the plant's main shoot. Now that wolves were back in the park, Beschta and Ripple teamed up to watch this natural experiment unfold. Would the carnivores' return change the valley's vegetation?

The wolves—which kill an elk every few days—did lower the herbivore's population, as other researchers have documented. And as the elk's numbers dropped, the willows and cottonwoods began to return; the aspens, which elk find especially tasty, are taking longer. "It was only last summer when we stumbled on aspens that are over my head," says Ripple, who is 1.8 meters tall. These clones grew in the riparian parts of the Lamar Valley; aspen clones the scientists measured on nearby upland areas remain stunted and have yet to regenerate. In some places, some trees had recovered, whereas others only a few meters away had not. Why the patchy recovery, when aspens in both locations have suffered equally from overbrowsing?

"We think it's due to what we call 'the

ecology of fear,'" says Ripple. "There are just some places now in the riparian zone that are too risky for the elk; a wolf may be lurking nearby." Along the river, the newly thick mix of willows, cottonwoods, and aspens may block an elk's escape route or its view, making the animal too nervous to linger over a long aspen-based lunch.

It's unclear why the aspens in the upland areas are not faring well. One reason is that "they are still getting hammered" by the elk, says Beschta.

That remains a "disappointment," says Soulé. "From a conservation perspective, aspen are a foundation species. When they recover, so do many others, including breeding songbirds."

Still, Beschta and Ripple are optimistic that the upland aspens will return, noting that the degraded Lamar River is also far from recovered. "It's likely just a matter of time," says Beschta. "The park was without wolves for 70 years, an absence that changed its ecosystem. Now, in the presence of wolves, the dynamics are changing again—in ways we can't always predict." Fear may just be the newest factor.

—VIRGINIA MORELL

Virginia Morell is a writer in Ashland, Oregon.

## Stem Cell Research, China Style

**BEIJING**—China is hoping to make up lost ground fast on stem cell research. Sources say Beijing plans to spend roughly \$1 billion over 10 years to establish an international center for stem cell research and regenerative medicine.

Six U.S.-based Chinese scientists—including Xiangzhong Yang of the University of Connecticut, Storrs, and Ray Wu of Cornell University—proposed the center in a letter to the government last September. Yang argues that China can soon reach the vanguard in stem cell research because the country is not encumbered by religious concerns about cells derived from embryos. "The challenge now is to find the right people," adds Wu. An official at China's Ministry of Science and Technology declined to confirm approval of the center, which has not been made public, but he says details are being worked out and the center would be under the ministry. The center would carry out both basic and clinical research, with the ultimate goal of developing therapies, Yang envisions.

—HAO XIN

## U.S.—India Deal Nears

**NEW DELHI**—India's time in the nuclear doghouse may soon be over. After 2 years of sometimes tortuous negotiations, India and the United States have reached agreement on a landmark nuclear pact. The proposed deal would allow India to purchase equipment and fuel for its civilian nuclear program, ending 3 decades of isolation after India exploded a nuclear device in 1974. Talks hit an impasse last spring over issues such as India's demand to reprocess spent fuel (*Science*, 25 May, p. 1112). But after negotiation last week in Washington, D.C., the two sides released a joint statement noting that "the issue" has been referred to the two governments for "final review."

Details of the agreement remain closely held, but top Indian nuclear scientists say that India has offered to set up a \$100 million plant for reprocessing spent fuel provided by the United States and make the plant subject to inspections by the International Atomic Energy Agency (IAEA) to monitor the potential diversion of extracted plutonium. The deal also avoids an automatic nuclear fuel embargo if India were to conduct a future nuclear test, a previous sticking point. If the two governments sign off on the agreement, IAEA and the international Nuclear Suppliers Group will then weigh respective accords on protecting nuclear materials and commerce with India.

—PALLAVA BAGLA

## NEWSFOCUS

# Wolves at the Door of a More Dangerous World

Weeks away from being removed from the endangered species list, wolves in the northern Rockies may soon be hunted once more

Three weeks ago, while tracking Yellowstone National Park's gray wolf (*Canis lupus*) packs from the air, wildlife biologist Douglas Smith darted wolf number 637, a young female from the Cougar Creek pack. Then, handling her on the ground for monitoring, he noticed that she had only three legs, probably after getting caught in a coyote trap outside the park's boundaries. Smith, leader of the park's wolf project, fears that 637's misfortune could be a harbinger of things to come, because gray wolves here are soon slated to be removed from the endangered species list. The new ruling from the U.S. Fish and Wildlife Service (USFWS) has been in the works for 5 years and is expected to be published at the end of this month in the *Federal Register*; it would go into effect 30 days later. Wolves on park grounds would still be protected, but "what will happen when they travel outside the boundaries?" asks Smith. "There's a good chance some are going to end up like this one, trapped or killed by hunters."

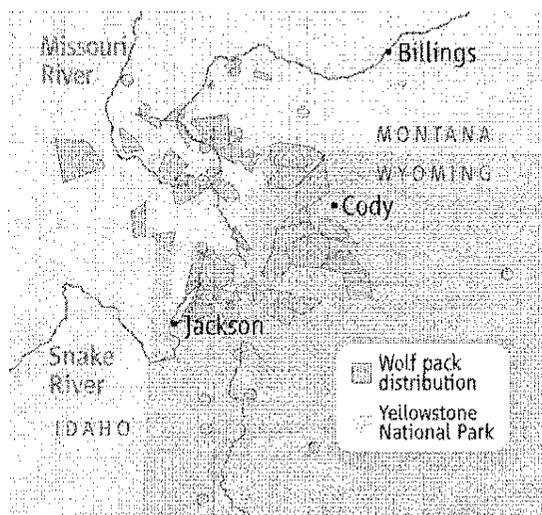
Smith isn't the only one worried about the future for wolves in the northern Rocky Mountains when they lose the protective shield of the federal Endangered Species Act. Yet at first glance, the announcement would seem cause for celebration. After all, wolves were intentionally driven to extinction in this region less than 100 years ago. Now, following successful reintroductions and management, their population hovers around 1500 animals.

But some of those who have worked to restore the wolf say the new ruling is like the proverbial wolf in sheep's clothing: It turns wolf management over to state and tribal agencies that plan to actively reduce the canid's numbers. The state management plans, already approved by USFWS, will allow trophy hunting and trapping of wolves, plus lethal control of those that harm

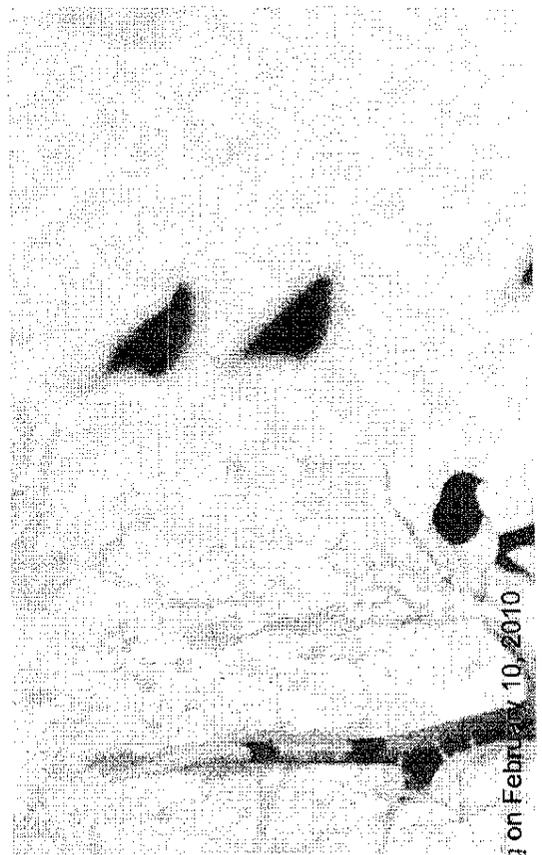
livestock or eat too many deer and elk. Last year, Idaho Governor C. L. Otter promised to "bid for that first ticket [hunting tag] to shoot a wolf myself," although he later said that Idaho would manage a viable wolf population. Most controversially, each state is required to maintain a population of only 100 wolves and 10 breeding pairs. That means wolf numbers could drop to a mere 300 and still be considered "recovered," although most wolf watchers think a tally of 500-plus animals is more likely.

So instead of popping champagne corks, as usually happens when a species is brought back from the brink, conservation groups are preparing legal briefs to challenge the ruling. They charge that it's based on politics, not science.

But USFWS officials say they are convinced their science is sound. "That is what the law mandates," says Edward Bangs, wolf recovery coordinator at USFWS in Helena, Montana, referring to the 1994 federal environmental impact statement that established the minimum numbers for recovery. "We've looked at every minute bit of science." He adds that the wolf's biologi-



**Pushing boundaries.** Yellowstone's wolves don't stay inside the park, as these partial estimates of their movements show.

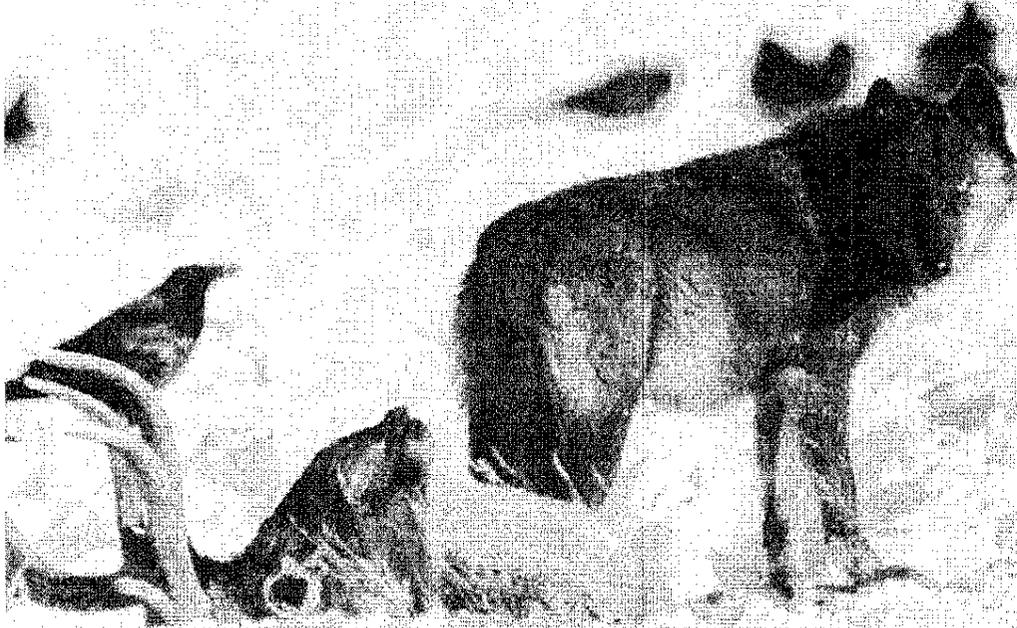


cal resilience gives him the most hope for their continued success. "Every year, about 23% of the population is killed by people legally and illegally, and yet the wolves are still growing at 24% a year. Biologically, they couldn't be any easier. But politically, wolves are the most difficult to manage."

## Hunted with passion

Before Lewis and Clark, some 350,000 wolves inhabited the lower 48 states, preying on bison, deer, and elk, according to genetic studies. As pioneers decimated the bison, wolves turned to livestock, and settlers and the federal government fought back with guns and poison. Ironically, it was the job of USFWS to wipe out wolves. They succeeded by the 1930s, extirpating the canids from more than 95% of their historic range. "Wolves were hunted and killed with more passion than any other animal in U.S. history," says a USFWS publication.

Placed on the federal endangered species list in 1974, gray wolves began making a comeback in the 1980s, when a few Canadian wolves (the Canadian population may be as high as 60,000) crossed the border and settled in Montana. In the 1990s, USFWS brought 66 Canadian and 10 Montana wolves to Yellowstone and a separate area in Idaho. Ranchers, farmers, and hunters fought the restoration, but USFWS surveys showed that many Americans wanted this top predator back on the landscape. "For many people, wolves are



**Top dog.** Some hunters worry that wolves may compete with them for elk and deer.

the symbol of Yellowstone," says Bangs. "They think that we should find a way to live with wolves," although he adds that this idea is more prevalent among city dwellers who don't live near wolves.

The reintroductions, which cost a total of \$27 million over 33 years, have been hailed worldwide as great successes, particularly in Yellowstone, where the wolves are helping to bring back a more balanced ecosystem (*Science*, 27 July 2007, p. 438). They also serve as key subjects in a natural laboratory for scientists. Research has shown the ecological benefits of reintroduction, many scientists say: "The most trenchant message from conservation science in the last decade comes from studies about the role of top predators in maintaining the health of ecosystems," says Michael Soulé, a professor emeritus at the University of California (UC), Santa Cruz.

With abundant prey and open territory, the reintroduced wolves rocketed back, doubling their numbers in the first few years. Young wolves regularly disperse in neighboring states such as Utah and Oregon, although packs have not yet been established there. And although the wolves are currently considered an endangered species, USFWS is allowed to manage them, which includes killing or relocating them. The agency removes packs that have spread into problem areas and has killed about 700 wolves since 1987.

Given the wolf's recovery, it's now time for the next step, says Bangs: removing

wolves from the Endangered Species List. To gauge scientists' reactions to the delisting and the minimum population target, USFWS "surveyed 80 scientists around the world," says Bangs. "Between 75% and 80% of them thought that this goal [of 300 wolves] was good enough, although I, personally, think it is too low. But the broad consensus was that this definition represents a minimum viable population." Bangs adds that the "states have already committed to managing for more than the minimum, so that there will be a cushion" of about 45 breeding pairs and more than 450 wolves.

That's still a reduction of about two-thirds of their numbers. Indeed, traces of earlier attitudes toward wolves linger. Many ranchers, farmers, and hunters despise the canids because they kill livestock and pets and compete for elk and deer. Posters put up by antiwolf groups label the wolf "The Saddam Hussein of the Animal World." Terry Cleveland, director of the Wyoming Game and Fish Department, says that "state law requires us to have an aggressive management plan for wolves," although he adds that this will include monitoring as well as hunting. Outside of the greater Yellowstone area, wolves will be classified as predatory animals. That means that, once delisted, they can be killed without a hunting license and by many methods,

including intentionally running over them with a car or in "wolf-killing contests." Cleveland says that "our floor wolf population here will be roughly 150 wolves. The ceiling has yet to be determined."

Idaho, too, plans a hunting season for its 700-some wolves, and populations will be thinned in areas of high conflict, says Steve Nadeau, a large carnivore manager for Idaho's Fish and Game Department. "But we're going to go slow and conservative to see how the harvest works." In Montana, where about 400 wolves reside, the numbers are also certain to drop because the plan describes wolves as a

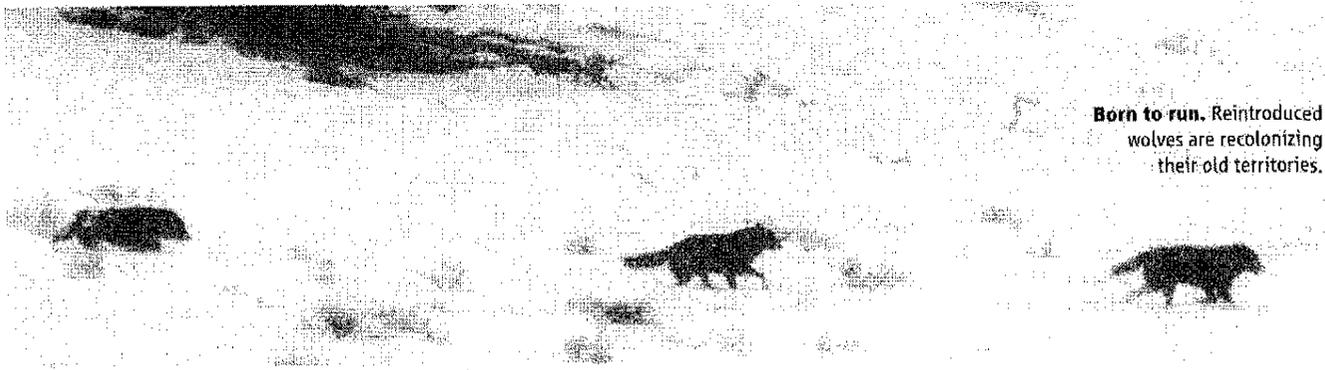
"species in need of management." Carolyn Sime, the wolf program coordinator for Montana's Fish, Wildlife, and Parks Department, says that "when there are at least 15 breeding pairs, hunting and trapping could occur."

The wildlife agencies insist they're not planning to send the canids back to the brink. "We manage big game for a living, and we're good at it," says Nadeau. "We'll do a good job with the wolves, too. The whole world is watching, and we know it."

The states' plans to treat wolves as big game animals available for trophy hunting may actually end up helping the canids, suggests Bangs. He expects hunters will likely become some of wolves' staunchest supporters, "just as they are now for mountain lions and black bears."

***"The whole world is watching, and we know it."***

—STEVE NADEAU,  
IDAHO FISH AND  
GAME DEPARTMENT



**Born to run.** Reintroduced wolves are recolonizing their old territories.

### Battling over the numbers

Despite Bangs's description of broad support for the delisting among the USFWS survey of scientists, many university scientists and conservation organization researchers interviewed by *Science* find the plan premature and unwise. In particular, they object to the notion that a population of 300 wolves is viable. "They don't even need a scientist to tell them that," says Robert Wayne, an evolutionary biologist at UC Los Angeles, whose lab has reconstructed the past genetic history of North America's gray wolves. In a letter he sent to USFWS last February in response to the service's request for his comments on the delisting proposal, Wayne wrote that the recovery goal "severely underestimates the number of wolves required for maintaining a genetically healthy, self-sustaining meta-population." He also notes that the delisting proposal makes no effort to assure that the populations in the three states and Canada are interconnected via corridors so that the wolves can mix genetically and form a metapopulation. He and others argue that such a metapopulation was one of the goals of the original 1987 federal wolf recovery plan.

The lack of gene flow most threatens the 171 wolves in Yellowstone National Park, which are all descendants of the first 41 released there between 1995 and 1997. Without new wolves, the population's genetic health is certain to decline, says Wayne and his graduate student Bridgett vonHoldt, who analyzed the genealogy and genetic viability of the Yellowstone wolves last year. They note that recent studies of a highly inbred population of Swedish wolves indicate that within 60 years, the Yellowstone wolves will begin suffering from "significant inbreeding depression," which will lead to a lower population. "It will be the equivalent of having one less pup a year," says Wayne.

But Bangs counters that the Endangered Species Act requires only that wolf numbers stay above the threatened or endangered level. "It isn't about maintaining genetic diversity," he says. If inbreeding problems arise, new wolves can always be reintroduced to the park later. "Connectivity can happen through a ride

in the back of a truck," he says. That attitude dismays vonHoldt. "The impact is there on the horizon for anyone to see," she says. "Why create a problem for others to solve down the line? Why not fix the recovery plan now?"

"Basically, the goals of the USFWS's wolf recovery plan aren't in sync with the latest thinking in conservation science," says Carlos Carroll, a wildlife biologist with the Klamath Center for Conservation Research in Orleans, California, who has modeled the restored wolf populations. "Biologists have moved away from the idea of a minimum viable population [MVP] to a more comprehensive population analysis." The problem with MVP numbers, he adds, is that "wildlife managers focus solely on that number," as they are in the three states. Instead, he and other researchers say that management plans need to include the "range of factors that might threaten a population and determine ways to make it more resilient to unexpected events," such as a new disease.

**"We will most certainly lose some of our wolves."**

—DOUGLAS SMITH,  
YELLOWSTONE WOLF PROJECT

"That 300 figure reflects old thinking; new data suggest that several thousand wolves" may be needed before delisting should be considered, says Carroll. He and others note that USFWS delisted the Great Lakes gray wolves only last year in Michigan, Wisconsin, and Minnesota, when the population totaled 4000 individuals. (Although all three states now consider wolves as big game animals, none has yet initiated a hunting season.)

And then there are the wolves of Yellowstone. Smith and others have monitored them for 13 years, collecting data that should help settle long-standing issues such as how great an impact wolves have on prey populations and how natural wolf populations fluctuate. None of the states' plans makes special provisions or buffer zones to protect these wolves; one of Montana's proposed wolf-hunting zones abuts the park's boundary. Six of the park's 11 wolf packs travel outside the park's boundaries every year (see map, p. 890); and two of these six do so for extensive periods of time, largely in pursuit of elk, the wolves' main prey. "They'll get into trouble," predicts Smith. "I support delisting. But [this] concerns me, because the parks' mission is one of protection

and preservation. And we will most certainly lose some of our wolves."

State wildlife managers make no promises on this issue, saying that wolves in their territory are fair game. "The Yellowstone wolves will be treated the same as elk that also travel outside of the park and are hunted," says Sime. Counters Smith, "These are park wolves; most spend 99.9% of their time here, yet they may get killed on that one trip outside. The public knows them as individuals. Which state official is going to take the call when someone's favorite wolf is shot?" Further, the loss of park wolves to hunters will "squander our research."

Many scientists would prefer to see the wolves remain on the endangered list until they reach a point at which they can be self-sustaining without the need for heavy human management. "It's frustrating," says Sylvia Fallon, an ecologist with the Natural Resources Defense Council in Washington, D.C. "Having a natural population of wolves is achievable and sustainable, and we're close to being there. But now, they're going to be knocked back down. We have to stop the delisting."

Environmental organizations are already running ads decrying the planned delisting and have joined forces to ask for an injunction against USFWS's proposal as soon as it is published. They have also already filed a lawsuit to try to block another USFWS ruling, published in late January, that would essentially let the three states begin lethal management of the wolves (although not a public hunting season), even if the delisting is blocked in court.

Conservationists argue that wolves should stay on the land and fulfill their ecological niche where possible. But for that to happen, people must accept the presence of wolves—and change their behavior accordingly, says Timmothy Kaminski, a wildlife biologist with the Mountain Livestock Cooperative in Augusta, Montana. Otherwise, a sad, repetitive scenario ensues, with wolves moving onto the same ranchlands, killing cattle, and then being killed, over and over. "Wolves are here; grizzly bears and mountain lions are here. You can't turn your cows out into a mountain pasture without being as vigilant as an elk," says Kaminski. "This is no longer a 20th century landscape."

—VIRGINIA MORELL

## NEWS &gt;&gt;

Concern over  
China's Poyang Dam

508

Turkey: New rules  
for archaeologists

510



CONSERVATION BIOLOGY

## Research Wolves of Yellowstone Killed in Hunt

On 3 October, a few weeks after Montana opened its first legal wolf-hunting season in decades, a hunter killed a female wolf in the Absaroka-Beartooth Wilderness, less than a mile from the border of Yellowstone National Park. She wasn't the first Northern Rocky Mountain gray wolf to be legally hunted since wolves were removed from the federal endangered species list last May. But she was the alpha female of Yellowstone Park's Cottonwood Pack and wore a large radio collar identifying her as wolf 527F. Her behavior, travels, life history, and genealogy had been studied in detail by scientists for 5 of her 7 years. Her death, and that of five other pack members also shot outside Yellowstone, including another radio-collared female, have irrevocably changed what had been a unique long-term study, the researchers say.

"We were studying one of the very few unexploited wolf populations in North America," where packs had lived and died naturally, says wildlife biologist Douglas Smith, leader of Yellowstone's wolf project, which has tracked the wolves since their reintroduction in 1995. "We can no longer make that claim."

The park's wolf project, partially funded by a \$480,000, 5-year National Science Foundation grant, isn't the only scientific study adversely affected. The death of the wolves and loss of the pack are also a blow to a host of studies, from wolf behavior to elk management and ecology, say other scientists, several

of whom have repeatedly asked Montana's Fish, Wildlife and Parks (FWP) department to establish a no-wolf-hunting zone around the park (*Science*, 15 February 2008, p. 890). "Yellowstone is one of the best examples in the world of what happens naturally to an ecosystem when an apex predator is returned," says ecologist William Ripple of Oregon State University, Corvallis, who has shown that wolves are helping to rebalance the park's ecosystem (*Science*, 27 July 2007, p. 438). "If the park wolves are being shot at, they're bound to change their behavior."

A possible buffer zone and other suggestions will be considered as they review this season's hunt, say FWP officials, who add that the hunt that killed 527F had not worked out as expected. In only 4 weeks, hunters had killed nine wolves in the Absaroka-Beartooth Wilderness, including 527F, nearly filling the quota of 12 wolves for this area's early season hunt. As a result, the agency last week closed the wilderness to wolf hunting for the remainder of the season, which ends when snow keeps hunters out.

"We didn't think that wolves would be that vulnerable in the backcountry, so the level of harvest there has been a bit of a surprise," says Carolyn Sime, FWP's wolf program coordinator in Helena, who added that the hunt was designed to target wolves that kill livestock, not wilderness or park wolves that have never caused problems in that area.

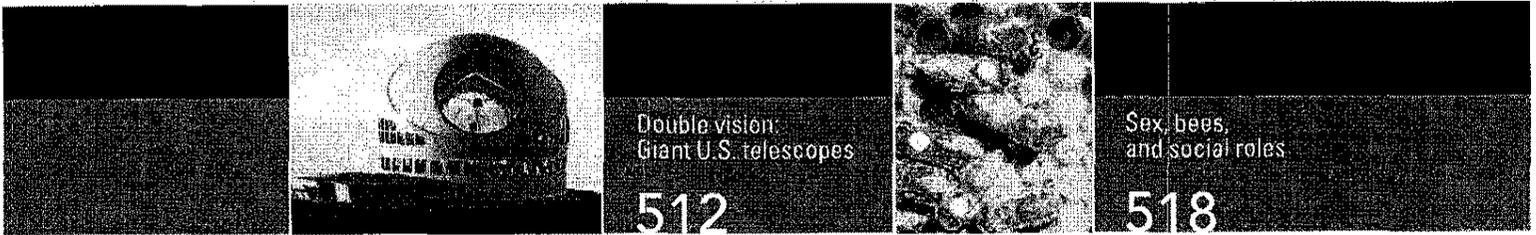
**Fair game?** Wolf 527F (above) was shot by a hunter, which affects researcher Doug Smith's studies.

However, many hunting camps are set up in the Absaroka-Beartooth Wilderness to take advantage of elk migrating out of Yellowstone, conservationists point out. Also, park wolves are naïve. "Every person the park wolves encountered was benign until now," says Smith.

Inside the park, wolves are regarded as study animals and tourist magnets, pulling in a minimum of \$35 million a year in tourist dollars, according to a 2006 University of Montana study. But as soon as a wolf crosses into Montana, it falls under state law, which regards the canids as "a species in need of management"—another big game animal that can be hunted like the deer, elk, bear, and mountain lion that also travel in and out of the park. Five of Yellowstone's remaining 12 packs have territories that stray outside park borders.

Some wildlife officials point out that the Cottonwood Pack may not be completely gone. The killing of most of its members has not greatly harmed Yellowstone's wolves or scientists' research, they argue, because there are more than 100 wolves left in the park and one wolf pack is very like another. "Biologically, [the loss] has no impact, since wolf packs turn over all the time," says Edward Bangs, wolf recovery coordinator for the U.S. Fish and Wildlife Service in Helena. "It doesn't make





Double vision:  
Giant U.S. telescopes

512

Sex, bees,  
and social roles

518

any difference to wolf conservation or wolf research, although it will cost Doug [Smith] more money to collar another wolf.”

But from Smith’s perspective the Cottonwood Pack is gone, and he will need to collar two more wolves—a dangerous, time-consuming task, costing \$1500 per wolf—to successfully track whatever pack moves into the Cottonwood’s former territory, which was 95% inside park boundaries. In addition, much of the data gathered on S27F and her pack are now worthless because the wolves met an unnatural end and no longer fit the project’s study criteria, he says. The project is now adding a new category to many of its 85 databases: harvested wolf.

A secretive wolf, whose territory this year was so remote that researchers seldom saw her, S27F was raising her third litter. (The fate of her five 5-month-old pups is not known.) At the

advanced age of 7, she was a key animal in many studies, including some on how long wolves live, their maximum body size, and female wolves’ lifetime reproductive success. These are some of the many unknowns of wolf biology that “can’t be studied outside Yellowstone because people curtail wolves’ maximum life spans,” explains Smith.

Smith collars the wolves, but many scientists independent of the wolf project have been gathering data on the radio-collared wolves. “Any time radio-collared animals are lost, it’s a huge setback for our research, since it’s the best tool for tracking their movements,” says Daniel McNulty, an ecologist at Michigan Technical University in Houghton, who has been studying wolf-prey dynamics in Yellowstone.

He worries that annual hunting of Yellowstone’s wolves will eventually affect their social dynamics and age structure, “skewing it toward

the younger classes, something that has been demonstrated in every game population” worldwide. That, in turn, could potentially be bad news for the park’s elk, because McNulty’s research has shown that younger wolves kill more elk. Evolutionary geneticist Robert Wayne of the University of California, Los Angeles, adds that an annual hunt, as is now planned for the Absaroka-Beartooth Wilderness, runs the risk of turning the area into “a predator sink, drawing wolves out of Yellowstone,” as young, dispersing animals search for unoccupied territories. “This shouldn’t have happened,” he says. “Yellowstone’s wolves should have absolute protection.”

But they don’t, and Montana’s FWP has a quota of three additional wolves in other areas adjacent to Yellowstone. Montana’s statewide wolf-hunting season opens on 25 October.

—VIRGINIA MORELL

#### AMPHIBIAN DECLINE

## Life and Death Play Out on the Skins of Frogs

For herpetologists, the global decline of amphibians has been agonizing. For Jamie Voyles, the most disturbing episode was witnessing the death of diseased frogs at the Omar Torrijos Herrera National Park in the Republic of Panama in 2004. “The subsequent silence left a long-lasting impression on me,” recalls Voyles, a graduate student in disease ecology at James Cook University, Townsville, in Australia.

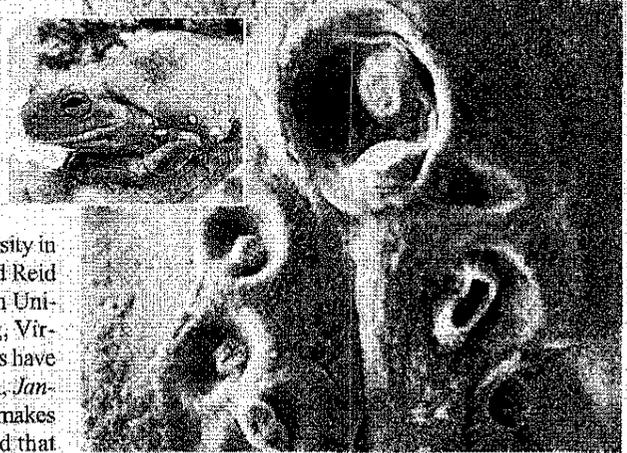
At the time, few clues existed about how the culprit—a fungal infection—could be so lethal. “Understanding how [the fungus] kills frogs was one of the biggest mysteries about the disease,” she recalls.

Now on page 582, Voyles and her colleagues go a long way toward solving that mystery. They find that the fungus, *Batrachochytrium dendrobatidis*, causes such severe electrolyte imbalances that the frog’s heart stops. “It fills a big knowledge gap about one of the most devastating [amphibian] diseases we’ve ever encountered,” says Brian Gratwicke of the Smithsonian National Zoological Park in Washington, D.C. “This paper clearly points to an osmoregulatory mechanism.”

This insight follows other, potentially

promising findings reported in March and in late August that certain skin bacteria can protect against fungal infection. Matthew Becker, now a student at Virginia Polytechnic Institute and State University in Blacksburg, Virginia, and Reid Harris of James Madison University in Harrisonburg, Virginia, and their colleagues have found that the bacterium, *Janthinobacterium lividum*, makes an antifungal compound that stops the fungal infection in its tracks. “This is one of the few bits of hope that many of us have,” says Karen Lips, an ecologist at the University of Maryland, College Park.

Herpetologists began realizing there was a worrisome trend in amphibians in 1989. By 2004, a global assessment concluded that “amphibians are more threatened and are declining more rapidly than either birds or mammals” (*Science*, 3 December 2004, p. 1783).



**Skin deep.** Studies of green tree frogs (inset) revealed how a fungus (seen close up on skin, with tubes for spores) kills amphibians.

At first, researchers blamed habitat destruction or climate change and changes in ultraviolet radiation. Then in 1998, Australian scientists reported finding a strange fungal infection on dead frogs in the rainforest. About the same time, Smithsonian researchers made similar observations in captive frogs, and in 1999, with the help of Joyce Longcore of the University of

## COMMENTARY

Island Lizards

33



Research Opportunities and NIH

36



LETTERS | BOOKS | POLICY FORUM | EDUCATION FORUM | PERSPECTIVES

## LETTERS

edited by Jennifer Sills

## Bushmeat Hunting and Climate: An Indirect Link

J. F. BRODIE AND H. K. GIBBS ("BUSHMEAT HUNTING AS CLIMATE THREAT," Letters, 16 October 2009, p. 364) argue that bushmeat extraction threatens the carbon stocks of tropical forests because (i) bushmeat hunting reduces abundances of large-bodied vertebrates; (ii) tree species with large seeds reproduce poorly without large-bodied vertebrates on which they depend for seed dispersal; (iii) large seed size is correlated with high wood density in tropical trees; and (iv) trees with high wood density contribute disproportionately to the carbon stock.

Their first point is well-established, but evidence regarding the others is mixed. Killing animals reduces seed dispersal of vertebrate-dispersed trees (1–4) but does not necessarily reduce the reproduction of large-seeded trees (5), perhaps because large-bodied animals also function as seed predators and herbivores (2, 6). Likewise, the correlation between seed size and wood density in tropical trees is at best weak (7). Finally, plots with trees of higher wood density do not necessarily have higher total tree carbon stocks; depending on the site, carbon stocks may be positively related, negatively related, or unrelated to mean wood den-

Lianas climbing a tropical canopy tree.



sity, because of the usually countervailing effects of tree volume (8).

Lianas (woody vines that climb into the tree canopy) provide an alternative possible link between bushmeat hunting and carbon storage. Hunting is a disadvantage for species with seeds dispersed by animals, and therefore gives a comparative advantage to species with seeds dispersed by wind (5, 9). This strategy is much more common among liana species than trees (60 versus 20%). Liana leaves displace an equal mass of tree leaves (10), and lianas store much less carbon per leaf area than trees (11). Thus, hunting may favor lianas, and an increase in lianas is likely to reduce carbon storage.

Whatever its effect on forest carbon stores, the bushmeat crisis is unarguably a major threat to tropical biodiversity (2, 12, 13). This by itself is reason to fight it.

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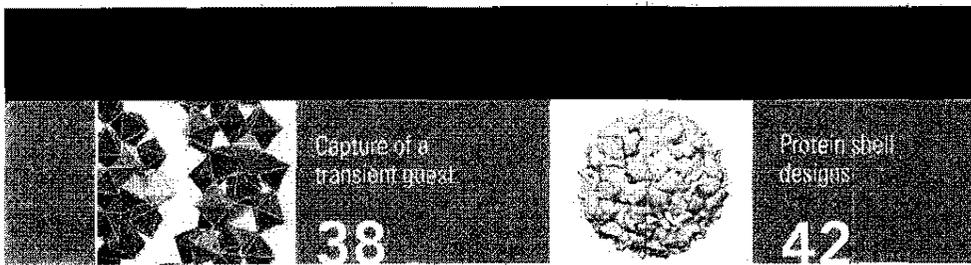
## Gray Wolves Not Out of the Woods Yet

IN APRIL 2009, THE U.S. FISH AND WILDLIFE Service (FWS) removed the northern Rocky Mountain population of gray wolves (*Canis lupus*) from all protections under the Endangered Species Act (ESA). Following the ESA's mandate to base listing determinations "solely on the...best scientific and commercial data available," FWS conducted an extensive analysis of regional threats to

wolves. They concluded that while "[p]ublic hostility toward wolves led to excessive human-caused mortality that extirpated the species," subsequent improvement in attitudes toward wolves ensured the long-term viability of the species.

We agree that human behaviors (and the attitudes and values underlying them) ultimately caused the extirpation of wolves in the northern Rockies, but we find little support for FWS's conclusion that attitudes toward wolves have improved, or are improving. Indeed, the

larger body of research points to the opposite conclusion (1–5). Although FWS provided more than 200 citations in their analysis, they cited just one empirical study that examined attitudes toward wolves (4). [This cannot be explained by a lack of published literature; a recent review identified 50 publications that specifically addressed the topic (6).] Thus, it appears FWS was either unaware of the extensive body of research on attitudes toward wolves, or chose to ignore this research. In fact, the only empirical article cited by FWS—



a meta-analysis—comes to a very different conclusion: “Across the 37 attitude surveys we studied, the reported statistics were stable over the last 30 years... [t]his contradicts a recent perception among some ecologists that wolf support has recently grown” (4).

The FWS’s analysis of the threat posed by negative attitudes toward wolves is wholly inadequate. When threats to a species’ continued survival are primarily social in nature, FWS must use the same standard that goes into analyzing biological and ecological threats. It is time for FWS to expand its view of what constitutes “science” and fully incorporate the social sciences into listing determinations.

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## Patents: A Threat to Innovation?

IN THE POLICY FORUM “BALANCING INNOVATION and access: Patent challenges tip the scales” (16 October 2009, p. 370), M. J. Higgins and S. J. H. Graham’s claim that Paragraph IV patent challenges are “increasingly stifling new drug innovation” is misleading.

Economists have repeatedly cautioned that correlation is not causation. The increasing number of Paragraph IV challenges, coupled with the decreasing number of FDA-approved new compounds is an interesting, but not causal, relationship. Declines in approvals could be due to a range of factors, including decreasing research productivity. Reasons for the decline in productivity include the increasing difficulty of understanding the science of more complex diseases and the focus of pharmaceutical companies on low-risk “me too” drug development (1).

Not all Paragraph IV challenges lead to early generic entry. In research documenting Paragraph IV challenges between 2004 and 2006, I found that only 13 (11%) of the 115 lawsuits resulted in a generic win (2). When



## **ALASKA CENTER *for the* ENVIRONMENT**

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Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
PO Box 115526  
Juneau, Alaska 99811-5526  
FAX: 907-465-6094

**February 10, 2010**

**Re: Denali Wolf Buffer**

*(Proposals #55, 58, 59, 60, 65)*

Dear Chair Judkins and the members of the Board of Game,

I am submitting these comments on behalf of the Alaska Center for the Environment and our nearly 7,000 Alaskan members who value and appreciate wildlife. Many of our members are wildlife viewers, small business owners, and recreationalists who rely on a vibrant and diverse environment and economy for their security and well-being.

I would like to speak to the issue of retaining and expanding a Denali wolf buffer. There are five proposals which address this issue, submitted by a diverse group of interests. All are worthwhile, with #58 being our preferred option. This option has the best potential for securing the future of the Denali's wolves. We hope you will fully support proposal 58 submitted by the Anchorage Advisory Committee. The other options for you to consider supporting are # 55, 59, 60 or 65.

There are many compelling reasons to retain and expand a buffer around Denali National Park. There is a history of a buffer around the park that came about for sensible economic reasons. Thousands of visitors come to Denali each year to view wildlife. This influx of visitors brings valuable economic development to the area. Recent studies from collared Denali wolves have shown the packs moving outside of the buffer areas and being trapped. This has resulted in a decline of wolves in the park. By allowing a couple of trappers to target these wolves has proved deleterious to the population and has caused a marked decline in the number of wolf sightings in the park.

There is no doubt that wildlife viewing is a vital component of the local economy and Denali is a premiere location for viewing wildlife that draws people from around the world.

Indeed, Denali National Park provides the best wolf viewing opportunities in the State of Alaska. The Board of Game should provide Denali National Park wolves the best protection possible for this reason alone.

Since 99% of state land is currently open to wolf hunting and trapping, we feel it is not too much to ask of the board to protect the Denali wolves. Denali wolves represent the longest studied group of wild wolves in the world. They provide researchers from around the globe long-term data on wolf ecology and behavior.

The Alaska Department of Fish and Game's Memorandum of Understanding with the National Park Service (1982) recognized the differing resource management goals of the State agency (to manage for sustained yield) and of the Park Service (to manage for conservation of natural and healthy populations). The MOU recognized the "increasing need to coordinate resource planning and policy development," and to "consult with each other when developing policy, legislation and regulations which affect the attainment of wildlife resource management goals and objectives of the other agency." Thus it is very disappointing to see that the Department of Fish and Game failed to support proposal 65 which was submitted by the National Park Service.

Please remember that The Board of Game is charged with providing wildlife opportunities for different user groups of Alaska's wildlife. This is a perfect opportunity for you to support tourism and wildlife viewing interests and would represent added protections for less than 3% of the wolf packs in Alaska. It doesn't seem like too much to ask and would go far towards improving relationships with many the Alaskans whose voices are not being heard with regards to the state's current wildlife management practices and policies.

Thank you for your consideration.

Sincerely,

Valerie Connor



Conservation Director  
Alaska Center for the Environment  
807 G Street, Suite 100  
Anchorage, Alaska 99501  
(907)274-3632  
[valerie@akcenter.org](mailto:valerie@akcenter.org)



Fish & Wildlife Service  
Alaska Regional Office  
1011 E Tudor Road  
Anchorage, AK 99503



National Park Service  
Alaska Regional Office  
240 W 5<sup>th</sup> Avenue  
Anchorage, AK 99501

February 9, 2010

Mr. Cliff Judkins, Chairman  
Alaska Board of Game  
Board Support Section  
P. O. Box 25526  
Juneau, Alaska 99802-5526

Dear Mr. Judkins:

The National Park Service and the U.S. Fish & Wildlife Service have only quite recently become aware of Board of Game Proposal #131 being placed on your upcoming meeting agenda. We are working seriously to evaluate all of its implications. Unfortunately we were afforded no opportunity to discuss this proposal with Commissioner Lloyd prior to its submittal by the Alaska Department of Fish & Game to the Alaska Board of Game.

At the outset, we fully recognize that this is about a State regulation governing State actions. However, because of the legal framework in place, State actions can directly affect Federal lands and the wildlife that use those lands. It has been suggested that by removing these State regulations, compliance with specific Federal laws might be avoided. We need to be clear; all of the Federal statutes which apply to park, monument, preserve and refuge lands must be fully complied with, regardless of the disposition of this State regulation. Our initial assessment of the proposal is that even if it were to pass, predator control activities within parks and refuges would require specific Federal authorization and supporting NEPA analysis.

We understand the State's concern about State management of wildlife in Alaska and do not wish to intrude upon those traditional powers; however, those powers are not absolute when we are dealing with Federal lands within the State. The discussion created by this proposal is touching upon fundamental jurisdictional issues between the Federal and State governments. We remain committed to a collaborative working relationship between our agencies and the State, recognizing that our differing legal mandates and policy frameworks create challenges and opportunities for problem-solving. We look forward to further dialogue on Proposal #131 at your meeting in Fairbanks.

Sincerely,

Handwritten signature of Geoffrey C. Haskett in black ink.

Geoffrey C. Haskett  
Regional Director  
US Fish & Wildlife Service

Handwritten signature of Sue E. Masica in black ink.

Sue E. Masica  
Regional Director  
National Park Service

To: Alaska Board of Game

Feb. 10, 2010

Re: Proposal Comments

As a 30 year Alaska resident and hunter for more than 20 years, I strongly Support: Proposals 55, 58, 59, 60 and 65 to expand the current buffer zone along Denali NP.

I oppose: proposals 56, 57, 61, 62, 63 and 64 which would shrink or delete the current buffers.

Very few trappers would be hurt by an expanded buffer zone, while hundreds of thousands of visitors traveling in Denali NP deserve the best chance possible to view these wolves.

Because these wolves are used to people in the Park, they are too easy to trap, justifying the buffer expansion.

Thank you for your consideration.

Sincerely, Jeff Sloss

Jeff Sloss, 740 5<sup>th</sup> St., Terrace

W. Katherine Hoak  
38 Horton Street  
West Islip, NY 11795

February 9, 2010

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

I am writing to support Proposals 55, 58, 59, 60 and 65. It is most important that the buffer zone next to Denali National Park be expanded.

Three times I have visited Denali, and on one of those visits had the thrill of seeing a wolf!

These expansions are modest in scope, but necessary to give added protection to the Foklat wolves. It is painful, as a wildlife lover and admirer of all of Alaska's wonders - to consider these wolves might be put under increased threat.

Sincerely,  
Katherine Hoak

PC 89

February 9, 2010

Boards Support Section  
Alaska Department of Fish and Game  
PO Box 115526  
Juneau, AK 99811  
Fax 908 465-6094

To Whom It May Concern:

I write to urge you to support the proposals to expand the current buffer zones, which outlaw trapping, around Denali. Proposals 55,58,59,60 and 65.

I'm sure you have the arguments for this action before you. I just want you to know that there are many of us who visit Alaska, who do not live there, who care deeply about these wolves. If it is true that the trappers in these regions number only a handful, I'm afraid their activities do not deserve priority at the expense of a species which has been exterminated in so much of the United States. Also, these are buffer zones around a National Park, so out of state citizens' wishes should get equal consideration to local residents.

Therefore, please do not support proposals 56, 57, 61, 62, 63 and 64, which would shrink or eliminate any buffer zone territories.

Thank you very much for your work on this controversial issue.

Sincerely,



Jennifer Thiermann  
3909 Rugen Road  
Glenview, Illinois 60025  
Fax 847 729-7750

Dear Sirs (Madams) of the BOG

Feb.9/10

I am writing this letter to ask your support and plead that you do the RIGHT and ETHICAL thing in expanding the buffer zones around Denali Park boundary.

As a scientist (M.D. with background in wildlife biology) , an musician, and (from what I am told )...an ethical and humane member of the human race, I am appalled by the proposed legislation that would allow for the potential extinction of a much beloved and admired wolf pack that has been habituated to human presence...namely the Toklat pack!

Where else can tourists (20%)hear and occasionally see elusive wolves in AK?  
It is a large drawing point for Denali....

Gordon Haber has long tried to increase these buffer zones ...not unlike the zones that have been created around Algonquin PK by Dr Theberge in Ontario...but that was NOT until the wolf packs were virtually exterminated by trappers and wolf haters....(one can always find a reason to kill a wild animal unfortunately!)

Since wolves cannot shop at Safeway :-)) for their food they are obliged to follow the prey ...which of course wanders outside of the park boundary....and "bingo" that were the "brave trappers" ...all 5 or 6 of them.... set up their torture/killing devices.Why? Aren't there other means of providing exceptionally warm clothing or making money than killing these magnificent keystone predators that provide such an important function by maintaining a balanced ecosystem.(see National Geographic report on Yellowstone wolves)..and a mesmerized tourist base!!

Besides wolves are highly intelligent , social , complex animals that have bonds that we can only hope to aspire to...killing them destroys a family ....not just "a wolf"

And what is the "sport" in tracking these animals with radiocollars...setting up traps in there habitual territories!.....is this humane and fair?

Wolves are NOT aware of Park boundaries and besides, as mentioned, need to follow the prey base....also VERY FEW individuals are impacted by increasing the buffer zones...namely a few trappers

Trapping is a horrible gruesome way to kill an animal...especially a wolf....mates and family members hang around and try to help the dying animal is it cannot chew off its leg....how would you feel if your son or daughter got trapped in rubble and you had to watch a similar scenario..?.these animals live in "families'....or packs ...are emotional and highly intelligent as well documented by numerous biologists, etc,,,not just Gordon Haber!!

I have been to Alaska quite a number of times and was planning a Denali trip....but will NOT go if proposals 56 ,57 61 62 63 and 64 are enacted. I STAND IN OPPOSITION TO THESE BRUTAL MEASURES which would endanger the survival of the TOKLAT pack...an American wildlife treasure!

I DO support 55,58 59, 60 and 65.!!!

Pls expand the BUFFER zones as they have done in other areas of Canada &US.

Finally ,in honor of Gordon Haber's legacy...a man who truly loved and tried to protect these magnificent creatures,.....(like him or not!).....and who gave up his life trying to do this; please EXPAND the protective buffer areas around Denali

John Vrabel  
Elaine Vrabel  
3 Indian Path  
Millstone Twp., NJ 08535  
(732) 792-0031  
February 8, 2010

Via FAX 907 465-6094

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

Re: Spring 2010 Proposal Book, Interior Region

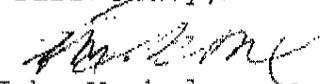
Dear Sir or Madam:

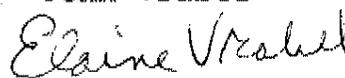
We are in favor of Proposals 55, 58, 59, 60 and 65.  
We are opposed to 56,57,61,62,63 and 64.

The proposals we support expand the buffer zones in a small way, less than ten miles; millions of acres are still available for trapping and hunting. The Tolkat wolves and others are a visitor attraction, and many people look forward to, and enjoy seeing, these wolves. Sadly, these animals are being trapped just outside the Park boundary when they migrate to follow prey. The wolves are not very afraid of human activity, and trappers know where to set the traps. The vast majority of visitors should be considered, not the few trappers who have an advantage over the wolves.

Thank you for your consideration.

Yours, truly,

  
John Vrabel

  
Elaine Vrabel

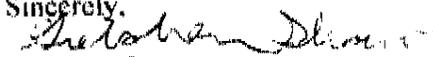
February 9, 2010

To Alaska Board of Game:

I am writing in strong favor of proposal 72-5 AAC 92.550 (GMU 20 C) to limit trapping in the Healy area to areas that are NOT NEAR private land, neighborhoods and subdivisions, school bus stops, and popular recreational trails for locals and tourists.

Almost exactly two years ago today an irresponsible trapping incident of a neighborhood dog was the beginning of a horrible chain of trapping events that have significantly changed the quality of my life, my husband's life and the lives of our pets forever. I personally know of 9 pet dogs who have been caught in snares, leghold and conibear traps in Healy in the past 24 months. These pets were not miles away in the deep wilderness; they were close to home in their neighborhoods where there is no leash law. Many of us live here and not in a city because we do not want to tie our dogs up. We are responsible dog owners whose dogs do not roam many miles away as trappers often portray. How does this problem affect me, you ask? As a direct result of irresponsible, reckless trappers, I am no longer safe to walk, hike, ski or skijor alone or with my pets in my very own neighborhood in Healy! I live in this beautiful state of Alaska and in this beautiful community in large because I love the outdoors and personally, I need the outdoors and so do my pets. We need to be outside, exercising and enjoying the natural beauty year round in order to maintain a healthy mind and body. This is my right! Irresponsible trappers have selfishly taken my rights away, without so much as a thought. It is a very sad day when we cannot take walks in our very own neighborhoods and town out of fear for ourselves, our children and our pets of being seriously injured or killed. I can no longer spontaneously step out my door and enjoy nature, as I have the right to do. Due to irresponsible trappers, I now have to plan out my outdoor activities. I have to warm up a vehicle, load my gear into it, load up my dogs and drive at least 15 miles into Denali Park so that I can exercise on the park road where it is safe from traps! This is absolutely ridiculous that my life has come to this. This is not only a pet problem! I personally know of many individuals in the Denali borough who have stepped into traps themselves while walking or hiking on popular public trails that have been used for many years. They have also stepped into leghold traps in Cantwell while working for DOT in the summers as they step a few feet off of the highway to relieve themselves. What are traps doing out in the summer for heaven's sake? Traps still set have been found in Cantwell and Healy the past two summers. Several were found in Dry Creek in Healy where many people enjoy walking regularly. It is only a matter of time before an adult or child, local or tourist, in this borough is seriously injured by a trap. Then what happens? Where is the moral and ethical responsibility of the trappers here? When trappers do not adhere to their very own Trappers Code of Ethics regarding pulling traps when the seasons close, checking trap lines regularly and not trapping where there is a possibility of catching nontarget animals, then frankly, their Code of Ethics is not worth the paper it is written on! I wonder: How many trappers can even recite their entire Code of Ethics? The blatant disregard for human and domestic animal life by irresponsible trappers sickens and disgusts me. There will be a day when I can walk freely in my own backyard again and I will not back down or give up until my right to do so is restored by law.

Sincerely,

  
Gretchen Shaw

Linda Donegan  
PO Box 220427  
Anchorage, AK 99522

Board of Game Comments  
Alaska Dept. of Fish and Game  
Boards Support Section  
PO Box 115526  
Juneau, AK 99811-5526

2/9/2010

Dear Board of Game Members,

Please consider these comments on proposals for the 2010 Fairbanks meeting.

I support the following proposals: 55, 58, 59, 60, and 65. I believe the hunting/trapping buffer zones adjacent to Denali National Park should be expanded to protect the wolves that frequent the park. They are known to travel into these zones in winter. It is important to protect these wolves to provide wildlife viewing opportunities for visitors to the park. Tourism is more important to the state's economy than is trapping. Only a few trappers would be affected and they have ample opportunities to trap elsewhere. These animals are far more valuable alive.

For the same reason, I oppose the following proposals: 56, 57, 61, 62, 63, and 64.

I oppose the following proposals: 66 and 67. It is not appropriate to establish intensive game management with predator control in this game unit, which contains a portion of Denali National Park and surrounding area.

Thank you,



Linda Donegan

Pr

Feb. 7, 2010

Alaska Department of Fish and Game

Attn: Board of Game Comments

Boards Support Section

P.O. Box 115526

Juneau, AK 99811-5526

I am writing in support of Proposals 55, 61, 63 and 64 and in opposition to 56, 57, 61, 62, 63 and 64. I am in support of expanding the buffer zones for the wolves of Denali. I am a long-time resident of the area, living in Cantwell and Healy for about 24 years.

The wolves inside Denali are not like wolves in other parts of the state. They are totally acclimated to people. If you've ever driven the Park road or taken the bus, they show no fear of people or traffic. They have lost, I believe, their innate suspicion of situations that prove perilous to them. While that in itself is cause for concern, it seems totally unsportsmanlike to target these same wolves and pups with traps. I know several of the people who trap in the area and they are not dependent on trapping for subsistence purposes like other areas of the state.

Please consider expanding their buffer zone so they have a better chance of survival. I believe my right to experience wildlife is equally if not more important than a trapper taking advantage of easy pickings.

Jan St. Peters

P.O. Box 323

Healy, AK 99743

Fax 907-465-6094

4143 E. 112<sup>th</sup> Ave  
Anchorage, AK 99516

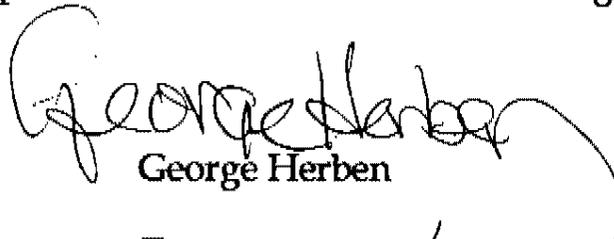
February 7, 2010

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

We urge you to support expanding buffer zones adjacent to Denali National Park.

Please VOTE FAVORABLY FOR Proposals 55, 58, 59 60 and 65.

Please reject any proposals that reduce or remove existing buffer zones.



George Herben



Priscilla Herben

## Opposition to Proposal 104

We are writing this letter in **opposition to Proposal 104** which recommends increasing the harvest quota from two to five caribou for the Central Arctic Caribou (CAC) herd in Unit 26B. We live in Fairbanks and also have a home in Wiseman, Alaska. Over the past several years we have spent approximately one third of our time in Wiseman. Wiseman is not our primary residence, and therefore, like most other rifle hunters in Unit 26B, we hunt outside of the Dalton Highway corridor. We typically access these areas by dogsled or on foot. Caribou is the preferred game meat in our household, and we typically harvest from two to four caribou per year. We are exactly the type of people that Proposal 104 is meant to benefit. Yet, we are opposed to increasing bag limits in this region.

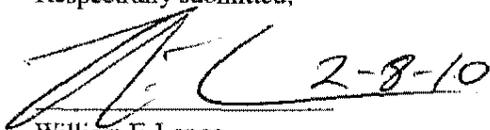
We have several reasons for opposing the harvest increase:

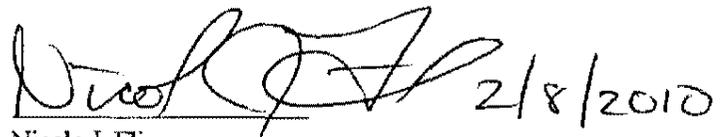
- 1) There is current legislation being proposed (House Bill 267) that would allow motorized access with snow machines during certain months of the year within the Dalton Highway corridor. Increasing harvest quotas and allowing for easier access simultaneously would result in excessive harvest of the Central Arctic herd. This would introduce two new variables at once into the management plan which would have an unpredictable and potentially devastating effect on the population of the Central Arctic herd. Since the fate of HB267 is unknown at the time of this BOG meeting it would be wiser to defer increasing harvest quotas for the time being.
- 2) The Alaska State Troopers recently deactivated the Coldfoot office. This change will negatively effect enforcement of any new game regulations. And the impact of not having a trooper in the area extends beyond enforcing game regulations. An increase in the number of hunters traveling the highway combined with a total lack of law enforcement and emergency medical services creates a huge public safety risk. The potential for increased trespassing, littering, traffic violations, poaching, destruction to public and private lands, vehicular accidents and medical emergencies is very concerning to local residents and property owners such as ourselves.
- 3) This proposal is very likely to result in more incidents of wanton waste. Currently, hunters must undergo a minimum 10-mile journey either by foot, skis or dogsled to retrieve a single caribou. Increasing the bag limit may very well tempt the hunter to take more caribou than they can physically retrieve. One need only recall the travesty of the young men and their trucks stuck in the tundra for months leaving tracks that will persist for generations!
- 4) We are also very skeptical of the population estimates given by the ADFG. The Central Arctic Caribou herd has more than doubled in 6 years? What is the error rate on this estimate? We question this statistic and are concerned that sampling errors may have occurred. There is certainly potential for overestimating the CAC herd size by mistakenly including collared members of the Porcupine Caribou herd that commingle with the CAC herd on the North Slope. Making a decision to increase the bag limit in 26B based on erroneous population estimates could be devastating to the herd's future.

**Opposition to Proposal 104**

In summary, we are hunters that predominantly hunt caribou in Unit 26B, and we are opposed to increasing the bag limit for caribou in that unit. Proposal 104 threatens the long term sustainability of the Central Arctic Caribou Herd, our primary source of meat for our family. We are also property owners directly south of Unit 26B and are extremely concerned for the safety of ourselves, our neighbors and our properties. With no public safety presence, any action by the BOG that could increase the number of hunters or hunting activity is a disaster in the making. Please vote to NO on Proposal 104.

Respectfully submitted,

  
William F. Lange

  
Nicole J. Fliss

408 Nordale Road North  
Fairbanks AK 99712

AND

Wiseman AK 99790

RECEIVED  
FEB 12 2010  
BOARDS  
ANCHORAGE

When we were in Alaska on vacation last year, we made a particular point of going to Denali to hopefully see a wolf. ♦We did and it literally MADE our trip.

When we came home we told everyone about the experience and at least 2 friends did what we did and went to Alaska.

Alaska is making a big mistake by trying to eliminate its wolves. ♦Rather you should value them as a natural treasure.

Sincerely,

Kenneth and Cherie Mason  
PO Box 39  
Sunset, ME 04683

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

RECE  
FEB 10  
BOARD

Regarding: Denali Wolf Buffer Proposals

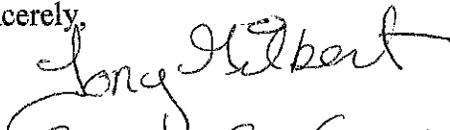
I **oppose** Proposals 56, 57, 61, 62, 63 and 64 which would eliminate the Denali Wolf Trapping Buffers.

I **support** Proposals 55, 58, 59, 60 and 65 which would retain or expand the existing buffers.

Denali National Park wolves have been shot or trapped in winter on lands outside the Park for many years. The existing buffers are much too small to protect them. When they are shot or trapped, opportunities for Park visitors to view them are reduced. Please do not adopt proposals that would eliminate the existing buffers. Please provide additional protection for the Park's wolves.

Thank you.

Sincerely,

  
35655 Fern Forest St.  
SOLDOTNA, AK 99669

**Kim Smith**

---

P.O. Box 3235 , Homer, AK 99603

January 28, 2010 01:32 PM

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

I am a 32 year resident of the State of Alaska. I am not a hunter, but a photographer. I want my views to be as important as those who would allow animals to be killed by outside hunters who blatantly waste our precious resource.

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

--Proposals #59 and #60 are reasonable and provide clear understandable boundaries.

I also urge you to support Proposal #5, submitted by the National Park Service, to exempt park lands from two new hunting rules meant to decrease black bear populations in Denali and Gates of the Arctic national preserves. Hunting bears in their dens with artificial light and allowing cubs and sows with cubs to be hunted at their dens is predator control and has no place in a national park unit.

Thank you for considering my comments.

Sincerely,  
Kim Smith  
P.O. Box 3235  
Homer, AK 99603

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

I am writing to oppose proposals 56, 57, 61, 62, 63, and 64, which would shrink or eliminate the current buffers around Denali National Park.

I am writing to support proposals 55, 58, 59, 60, and 65 which would expand the current buffers to provide additional areas where wolves would not be subject to trapping and hunting.

Few individuals would be impacted by the increased buffers, which are not excessive, since thousands of acres are available outside of the buffers for wolf hunting and trapping. Hundreds of thousands of visitors will have increased opportunities to view Denali's Toklat wolves.

Thank you for your consideration,

William Taylor  
1087 Tanland Dr Apt 104  
Palo Alto, CA 94303

January 28, 2010 03:03 PM  
202-659-0650

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

As a citizen of Alaska for many years, of the US and our planet earth, I urge you to continue to protect the bears and wolves in Denali and Gates of the Arctic with the protective buffer zones. These animals are two of our most precious resources in Denali and essential parts of the ecosystem.

Hunting bears in their dens with artificial lighting and other methods should never be allowed in our parks. It is shocking that there has been this or any method of predator control. Please let's not allow our wild parks, where nature runs as it is supposed to, go the way of those in the Lower 48.

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

--Proposals #59 and #60 are reasonable and provide clear understandable boundaries.

I also urge you to support Proposal #5, submitted by the National Park Service, to exempt park lands from two new hunting rules meant to decrease black bear populations in Denali and Gates of the Arctic national preserves. Hunting bears in their dens with artificial light and allowing cubs and sows with cubs to be hunted at their dens is predator control and has no place in a national park unit.

Thank you for considering my comments.  
Carol Clemens

Sincerely,  
Carol Clemens  
PO Box 669  
Palmer, AK 99645

## Mary Helen Stephens

---

Po Box 1272 , ♦ Valdez, AK 99686

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

I do not hunt nor trap, but am not opposed to legitimate hunting or trapping. I am violently opposed to outright killing of any form of life. We need a natural control of wildlife - letting nature balance populations the way it is done if we keep out of it. Wildlife have their own boundaries according to food supply available. Buffer zones are great, however animals aren't going to know to respond to manmade boundaries. We have to be able to recognize that fact.

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

--Proposals #59 and #60 are reasonable and provide clear understandable boundaries.

I also urge you to support Proposal #5, submitted by the National Park Service, to exempt park lands from two new hunting rules meant to decrease black bear populations in Denali and Gates of the Arctic national preserves. Hunting bears in their dens with artificial light and allowing cubs and sows with cubs to be hunted at their dens is predator control and has no place in a national park unit.

Thank you for considering my comments.

Sincerely,  
Mary Helen Stephens

330 N. Searsport Rd.  
Swanville, Me. 04915  
February 8, 2010

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

To Whom It May Concern,

I am writing to urge you to support proposals 55, 58, 59, 60 and 65. These proposals would expand the buffer zone to protect wolves adjacent to Denali National Park.

As a past artist-in-residence in Denali National Park the highlight of my residency was seeing a wolf along the East Fork of the Tolkat River. Many visitors to Alaska travel from the lower forty eight in order to see Alaska's magnificent wildlife. My residency was my second trip to Alaska and I hope to return again, but if Alaska keeps up its war on wolves that future trip remains on hold.

Sincerely,



Janice Kasper

**Connie Brandel****RECEIVED**

**From:** Gayle Elicerio [wolfclan@mosquitonet.com]  
**Sent:** Wednesday, February 10, 2010 9:01 PM  
**To:** info@akwildlife.org  
**Subject:** Toklat Pack Boundary Expansion

**FEB 12 2010****BOARDS  
ANCHORAGE**

Board of Game Members...

I cannot speak strongly enough in SUPPORT of Proposals 55, 58, 59, 60 and 65 and the expansion of the current buffer zone adjacent to Denali National Park boundary to protect the Toklat pack and other Denali wolves --these are a few of the reasons I hope you all take into serious consideration when making your decisions.....

\* Hundreds of thousands of visitors travel the Park road hoping

to see  
these wolves

every year, and 19 percent of these visitors have the great fortune to see or hear these wolves.

\* Few individuals would be impacted by an expanded buffer zone.

There are

only about five trappers targeting these wolves on the Park border.

\* The trappers who target the Park wolves are extraordinarily successful.

Research shows that 30 percent of Park wolf mortality is human caused, i.e. trapping and shooting. This is because the wolves are habituated to human activity and the trappers know exactly where to set their traps.

\* The proposals seeking to expand the buffer zones are modest, extending the

protected zone for wolves by less than ten miles. This is no land grab, because there are many millions of acres of land outside the proposed buffers where wolf trapping and hunting are legal.

\* Gordon Haber, a wildlife biologist, spent a lifetime studying Denali's Toklat wolves and was a tireless advocate for expanded buffer zones around the Park. He died in a tragic plane crash while tracking these wolves last fall, and expanded buffer zones would be a fitting memorial.

The Toklat pack is invaluable for so many reasons!! And to be able to hear the haunting song of a wolf in the wild, or if you're extremely lucky, the song of the whole pack, is a gift beyond measure!! However, to look at it from a more 'biology based standpoint', they are a source revenue as they provide infinite good press for lodges and local tourism and they are part of the intricate ecosystem that would crash without their presence. I urge you to do the right thing--expand the buffer zones and support the above proposals.....

I vehemently OPPOSE proposals 56, 57, 61, 62, 63, and 64.

Thank you for your time and consideration of my opinions..

Sincerely,

Audrey Elicerio

Fairbanks, Ak.

ps. and yes, I'm speaking as someone who's lived with wolves as close neighbors for well over 25 years, and I quite frankly, I've found them to be better neighbors than a lot of humans I know ! ;-)

**RECEIVED****FEB 12 2010****BOARDS  
ANCHORAGE****To The Board of Game:**

**I am writing as someone who has lived in the Interior over 40 years, as someone who has hunted and hiked throughout Alaska during that time, and who has visited Denali National Park many times.**

**I would most strongly request you approve any or all of proposals 55, 58, 59, 60, and 65 which seek to maintain or expand the No-Trapping Buffer Zone on the edge of the Park. Their approval would indicate to the thousands of visitors to the Park each year, both Alaskan and non-Alaskan, that you recognize the value of the wolves involved as more than a quick dollar on the fur market. Their presence, according to many studies by the tourism industry as well as the Park staff, is one of the great wildlife draws and thus contributes a considerable amount of money to both the local and state economies.**

**I would equally ask you disapprove proposals 56, 57, 61, 62, 63 and 64. They represent a very narrow segment of Alaskans, the very few trappers involved are recreational and hardly dependent on these wolves for a livelihood, and there are ample areas already available for them elsewhere.**

**Sincerely,**

**Art Greenwalt**

**1620 Washington Dr., Apt. 79**

**Fairbanks, Ak. 99709**

**RECEIVED**

**FEB 12 2010**

**BOARDS  
ANCHORAGE**

***Re: Expanding the Buffer Zones for the Toklat Wolves.***

***Supporting Proposals 55, 58, 59, 60 & 65, would definitely benefit the wolves.***

***Jane Heltebrake  
419-874-3021***

I would like to see an expansion of BUFFER zones around Denali Park and  
are in favor of Prop.55 58 59 60 65.....NOT56 57 61 62 63 64

thank You

--

RH Torborg  
Muthanna PRT Builg.  
333 Camp Adder  
APO, AE 09331

rtorborg@gmail.com

**RECEIVED**

**FEB 12 2010**

**BOARDS  
ANCHORAGE**

**RECEIVED**

**FEB 12 2010**

**BOARDS  
ANCHORAGE**

As a one-time visitor to Alaska, some years ago, I was fortunate to take the Denali bus tour and visit that beautiful wildlife area. To have seen a wolf would have been a fantastic experience. I did not see one. But I **KNEW THEY WERE THERE!** Denali without wolves is Alaska without tourists!!!! You must stop slaughtering the wolves.

Dorothy McCorkle

**RECEIVED**

**FEB 12 2010**

**BOARDS  
ANCHORAGE**

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

**I have visited Denali National Park 27 times. Each trip I spend thousands of dollars in your state. One of the main reasons I come is to observe and photograph the Toklat Wolf Pack. It is important that this wolf pack be protected as much as possible. Therefore, I strongly support Proposals 55, 58, 59, 60 and 65 and strongly oppose Proposals 56, 57, 61, 62, 63, and 64.**

**Thank you.**

*Bob*

Robert A. Watson  
Federated Media  
P.O. Box 2500  
Elkhart, IN 46515  
Office-(574)296-5829  
Cell-(574)383-5700  
Home-(574)656-8719  
rwatson@federatedmedia.com

Please I oppose the Proposals # 56, 57, 61, 62, 63 and 64.

I support proposals 55, 58, 59, 60 and 65.

We need to expand the buffer zones!!!!!!!!!!!!!!!!!!!!!! Remember that the park needs visitors to sustain Alaska's tourism!! They want to see a wolf!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!

Donna McCall

**RECEIVED**  
**FEB 12 2010**  
**BOARDS**  
**ANCHORAGE**

To: Alaska Board of Game Comments  
Alaska Dept. of Fish & Game  
Boards Support Ssection  
POB 115526  
Juneau, AK 99811-5526

I respectfully ask that you support Proposals 55,58,59,60 and 65 to exand the current buffer zone adjacent to the Denali National Park Boundary.

I urge you to oppose proposals 56,57,61, 63 and 64. These shrink or eliminate the current buffers.

I have been to Alaska once and I want to come again but will not be coming if there are no wolves to see. I have done wolf education here in New Mexico to reintroduce the Mexican Wolf because wolves should continue to exist in our land as a natural part of the biodiversity.

Thank you for considering my comments.

Mrs. Geri Tillett  
2140 Gladys Dr.  
Las Cruces, NM 88001

February 9, 2010

**RECEIVED**

**FEB 12 2010**

**BOARDS  
ANCHORAGE**

**RECEIVED**

**FEB 12 2010**

**BOARDS  
ANCHORAGE**

To The Board Of Game,

I have lived in Alaska for 21 years now, one of the reasons I came to this beautiful state was because of the wildlife I could see here, especially WOLVES.

I am not a person who is considered to be mean, but I am sick and tired of you people on the Board of Game going against what the people of Alaska have said. We have told you several times that we do not want Ariel Wolf Hunting and You go ahead and do it.

Because of the SLAUGHTERING OF WOLVES MY KIDS WILL NEVER EVER GET TO SEE A WOLF IN THE WILD IN DENALI PARK BECAUSE OF YOU ALLOWING PEOPLE TO TRAP OUTSIDE OF THE PARK.

TRAPPING IS A VERY BARBARIC PRACTICE AND A NUMBER OF INNOCENT ANIMALS GET CAUGHT IN THOSE TRAPS.

IT COMES DOWN TO THIS, STOP ALLOWING SO MANY OUT OF STATE HUNTERS TO KILL OUR MOOSE AND ALSO CLOSE DOWN HUNTING TO ALL PEOPLE IN THE STATE OF ALASKA WHERE THE MOOSE COUNT IS DOWN INSTEAD OF JUST CERTAIN PEOPLE.

GOD PUT THE WOLVES ON THIS EARTH AND NOW YOU ARE DESTROYING WHAT HE PUT HERE FOR OUR ENJOYMENT TO WATCH AND STUDY, NOT TO SLAUGHTER.

PEOPLE IN THE LOWER 48 STATES COME HERE AND GO TO DENALI PARK TO HOPEFULLY SEE A WOLF, WELL IF YOU HAVE YOUR WAY THEY WILL NEVER EVER SEE ONE AND WILL STOP COMING BECAUSE OF THAT.

I THINK THAT THE BOARD OF GAME SHOULD BE VOTED ON BY ALL THE PEOPLE OF ALASKA INSTEAD OF JUST THOSE WHO ARE ABLE TO SHOW UP, YOU ALL GET VOTED IN BY POLITICIANS AND THAT IS BULL CRAP. YOU SHOULD BE VOTED INTO OFFICE JUST LIKE SENATORS AND OTHER POLITICIANS.

IN MY OPINION YOU GUYS SUCK AND WE THE PEOPLE OF THE STATE OF ALASKA WANT YOU OUT OF OFFICE AND PUT IN MORE PEOPLE WHO DO NOT HAVE POLITICAL TIES IN OFFICE.

Dani Button

**RECEIVED**

**FEB 12 2010**

**BOARDS  
ANCHORAGE**

I oppose the proposals 56, 57, 61, 62, 63, and 64 which would decrease the buffer zone of safety for the alaskan wolves. I lived in Fairbanks for 2 years and Anchorage for 2 years.....I never once had the chance to see a wolf. I was a avid hiker and backpacker and can't imagine reducing the # of wolves. Humans need to stay out of wildlife culling!!!!!!!!!!!!!!!

Megan Klune

**RECEIVED**

**FEB 12 2010**

**BOARDS  
ANCHORAGE**

**Dolly Subosits Realtor  
Templin Realty Inc  
Deltona FL**

**To All Those In Power To Protect Denali Wolves. I definitely support expanding areas around the park - 10 miles is so little! I support the proposals that are for this. I have not been to the park myself but my daughter has and she did see 2 wolves. Why can't we save them? what worthless people, trapping and shooting when it's so easy.**

**Dolphine E. Subosits, 1114 N Brickell Dr., Deltona, FL 32725**

**RECEIVED**

**FEB 12 2010**

**BOARDS  
ANCHORAGE**

to the Board of Game

Please support board proposals #55, 58, 59, 60 & 68 for the expansion of the Denali trapping buffer. Please oppose board proposals #56, 57, 61, 62, 63 & 64. These are the most studied and recognizable wolves in America, much less Alaska.

These wolves do not significantly affect any huntable game populations and should be protected because of their viewing status for both visitors and locals alike. Wolf packs are under the gun from BOG proposals all over the state, the reasoning being that their numbers are affecting game that subsistence hunters and game hunters rely on. There is no such situation exists here nor is there a biological necessity for further reduction of these wolves.

Didier J. Lindsey  
4222 Resurrection Dr.  
Anchorage, AK 99504  
338-5216

RECEIVED  
FEB 12 2010  
BOARDS  
ANCHORAGE

February 9, 2010

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

ATTN: Board of Game Comments

I am writing this letter to show my support for Alaska's Toklat Wolves and the proposals to expand the current buffer zone adjacent to the Denali National Park. This modest expansion would have very little impact on humans but a big impact on the survival of the wolves. I believe wolves benefit Alaska's eco system, and attempts should be made for their continued long-term survival.. Proposals I support are #'s 55, 58, 59, 60 and 65.

Please accept this letter to show my opposition to the proposals that seek to reduce or eliminate the current buffers. I am strongly opposed to Proposal #'s 56, 57, 61, 62, 63, and 64.

Sincerely,

Reta Hanks  
249 Sussex Place  
Carson City, NV 89703

RECEIVED  
FEB 12 2010  
BOARDS  
ANCHORAGE

February 10, 2010

Carolyn D. Rhodes  
12 Water Street  
Bluffton, S.C. 29910

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

Dear Sirs:

Please **save** the Toklat Wolves in Denali National Park by supporting Proposals 55, 58, 59, 60, 65. These proposals will expand the current buffer zones adjacent to the Denali National Park boundary. Increasing the buffer zones will decrease, and hopefully, stop the appalling, and cruel killing by trapping of the Toklat Wolves.

The Toklat Wolves are a National Treasure of the State of Alaska. These wolves are a significant part of Denali National Park, and a main reason that many tourists come to the park.

Please save these interesting, and at one time, trapped to near-extinction, fantastic mammals.

Carolyn D. Rhodes

February 09, 2010

Louis D. Rhodes, Jr.  
P.O. Box 858  
Bluffton, S.C. 29910

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

Dear Sirs:

Please support **Proposals: 55, 58, 59, 60, and 65** to expand current buffer zones adjacent to the Denali National Park boundary.

I am in **emphatic opposition** to Proposals: 56, 57, 61, 62, 63, and 64 which, if passed, will dramatically reduce and eliminate the current buffer zones for the Toklat Wolves in Denali National Park.

Several years ago my wife and I visited and toured by bus Denali National Park. It was an unbelievable exeprience! Everyone on the bus was looking for the Toklat wolves, and we were fortunate enough to see a lone wolf.

The reduction of the buffer zones will drastically increase the inhumane and useless trapping and killing of these Toklat wolves. These wolves are a national treasure and resource of the great State of Alaska!! This is the only state in the nation that is mostly undeveloped, and is still "in the wild".

Please do NOT accept the proposals which will reduce and eliminate the Toklat Wolves buffer zones adjacent to Denali National Park.

Thank-you for your consideration.

Louis D. Rhodes, Jr.

RECEIVED

FEB 12 2010

BOARDS  
ANCHORAGE

**RECEIVED****FEB 12 2010****BOARDS  
ANCHORAGE**

My husband John and I and friends had the privilege to go into Denali park a few years ago and we saw a WOLF. We were shocked and thrilled. Of all the animals to see a wolf in the wild was beyond wonderful. He/She just appeared and walked down the road towards our bus. I often wonder if that wolf is still alive or if all the small minded people who run the wildlife bureau in Alaska have killed that beautiful wolf. Alaska's vendetta against its wildlife, it most precious resource, is shocking. Please let the Wolves of Denali live  
Eileen Bosch

Eileen Bosch  
DRE#00622009  
12988 Saratoga-Sunnyvale Rd.  
Saratoga, CA, 95070  
408-892-3333  
[ebosch@apr.com](mailto:ebosch@apr.com)  
[www.EileenBosch.com](http://www.EileenBosch.com)  
[www.CallEileen.com](http://www.CallEileen.com)

*"One of the hardest things in life to learn is which bridge to cross and which bridge to burn"*

## Hugh Rose

---

620 Yak Road , Fairbanks, AK 99709

January 28, 2010 02:39 PM

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

--Proposals #59 and #60 are reasonable and provide clear understandable boundaries.

I also urge you to support Proposal #5, submitted by the National Park Service, to exempt park lands from two new hunting rules meant to decrease black bear populations in Denali and Gates of the Arctic national preserves. Hunting bears in their dens with artificial light and allowing cubs and sows with cubs to be hunted at their dens is predator control and has no place in a national park unit.

Thank you for considering my comments.

Sincerely,  
Hugh Rose  
620 Yak Road  
Fairbanks, AK 99709

## John Rhodes

---

1640 Golden View Drive , Fairbanks, AK 99709

January 28, 2010 01:11 PM

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

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--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

--Proposals #59 and #60 are reasonable and provide clear understandable boundaries.

I also urge you to support Proposal #5, submitted by the National Park Service, to exempt park lands from two new hunting rules meant to decrease black bear populations in Denali and Gates of the Arctic national preserves. Hunting bears in their dens with artificial light and allowing cubs and sows with cubs to be hunted at their dens is predator control and has no place in a national park unit.

Thank you for considering my comments.

Sincerely,  
John Rhodes  
1640 Golden View Drive  
Fairbanks, AK 99709

**Susan Vanino**

---

96 Waldron Ave. , Glen Rock, NJ 07452

February 2, 2010 11:11 PM

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

--Proposals #59 and #60 are reasonable and provide clear understandable boundaries.

I also urge you to support Proposal #5, submitted by the National Park Service, to exempt park lands from two new hunting rules meant to decrease black bear populations in Denali and Gates of the Arctic national preserves. Hunting bears in their dens with artificial light and allowing cubs and sows with cubs to be hunted at their dens is predator control and has no place in a national park unit.

Thank you for considering my comments.

Sincerely,  
Susan Vanino  
96 Waldron Ave.  
Glen Rock, NJ 07452

---

TO: Alaska Board of Game  
P.O. Box 115526  
Juneau, AK 99811-5526

FROM: B Slater  
PO Box 2316  
Homer, AK 99603

SUBJECT: Support Board of Game Proposals #5, #59, and #60

DATE: January 29, 2010 02:58 AM

---

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

--Proposals #59 and #60 are reasonable and provide clear understandable boundaries.

I also urge you to support Proposal #5, submitted by the National Park Service, to exempt park lands from two new hunting rules meant to decrease black bear populations in Denali and Gates of the Arctic national preserves. Hunting bears in their dens with artificial light and allowing cubs and sows with cubs to be hunted at their dens is predator control and has no place in a national park unit.

Thank you for considering my comments.

Sincerely,  
B Slater  
PO Box 2316  
Homer, AK 99603

January 28, 2010 01:09 PM  
202-659-0650

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild. I am not a resident of Alaska, but appreciate the opportunity of seeing wolves. I went out west to see wolves, but very few were seen. As a matter of fact, I did not see any. However, the timing was not right.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

--Proposals #59 and #60 are reasonable and provide clear understandable boundaries.

I also urge you to support Proposal #5, submitted by the National Park Service, to exempt park lands from two new hunting rules meant to decrease black bear populations in Denali and Gates of the Arctic national preserves. Hunting bears in their dens with artificial light and allowing cubs and sows with cubs to be hunted at their dens is predator control and has no place in a national park unit.

Weapons should not be permitted in national park lands. This is a safety issue with so many visitors in the parks.

Thank you for considering my comments.

Sincerely,  
Earl Markley  
54 E. Parkway Dr. Apt. 108  
Pottstown, PA 19465

## Kim Smith

---

P.O. Box 3235 , Homer, AK 99603

January 28, 2010 01:32 PM

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

I am a 32 year resident of the State of Alaska. I am not a hunter, but a photographer. I want my views to be as important as those who would allow animals to be killed by outside hunters who blatantly waste our precious resource.

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

--Proposals #59 and #60 are reasonable and provide clear understandable boundaries.

I also urge you to support Proposal #5, submitted by the National Park Service, to exempt park lands from two new hunting rules meant to decrease black bear populations in Denali and Gates of the Arctic national preserves. Hunting bears in their dens with artificial light and allowing cubs and sows with cubs to be hunted at their dens is predator control and has no place in a national park unit.

Thank you for considering my comments.

Sincerely,  
Kim Smith  
P.O. Box 3235  
Homer, AK 99603

## Richard Kemp

---

POB 10798 , Fairbanks, AK 99710

January 28, 2010 03:19 PM

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

--Proposals #59 and #60 are reasonable and provide clear understandable boundaries.

I also urge you to support Proposal #5, submitted by the National Park Service, to exempt park lands from two new hunting rules meant to decrease black bear populations in Denali and Gates of the Arctic national preserves. Hunting bears in their dens with artificial light and allowing cubs and sows with cubs to be hunted at their dens is predator control and has no place in a national park unit.

Thank you for considering my comments.

Sincerely,  
Richard Kemp  
POB 10798  
Fairbanks, AK 99710

**kimberly McConkey**

---

2610 E 42nd ave #1 , Anchorage, AK 99508

January 28, 2010 02:35 PM

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

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I also urge you to support Proposal #5, submitted by the National Park Service, to exempt park lands from two new hunting rules meant to decrease black bear populations in Denali and Gates of the Arctic national preserves. Hunting bears in their dens with artificial light and allowing cubs and sows with cubs to be hunted at their dens is predator control and has no place in a national park unit.

Thank you for considering my comments.

Sincerely,  
kimberly McConkey  
2610 E 42nd ave #1  
Anchorage, AK 99508

---

TO: Alaska Board of Game  
P.O. Box 115526  
Juneau, AK 99811-5526

FROM: NATACHA PENET  
38 rue Pasteur  
UNIEUX, AK 42240 France

SUBJECT: Support Board of Game Proposals #5, #59, and #60

DATE: January 28, 2010 01:13 PM

---

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

--Proposals #59 and #60 are reasonable and provide clear understandable boundaries.

I also urge you to support Proposal #5, submitted by the National Park Service, to exempt park lands from two new hunting rules meant to decrease black bear populations in Denali and Gates of the Arctic national preserves. Hunting bears in their dens with artificial light and allowing cubs and sows with cubs to be hunted at their dens is predator control and has no place in a national park unit.

Thank you for considering my comments.

Sincerely,  
NATACHA PENET  
38 rue Pasteur  
UNIEUX, AK 42240

January 29, 2010 05:05 PM  
202-659-0650

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

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Thank you for considering my comments.

Sincerely,  
Suzanne Wilson  
P.O. Box 65  
Glennallen, AK 99588

January 29, 2010 03:29 AM  
202-659-0650

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

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Thank you for considering my comments.

Sincerely,  
Tina Brown  
19400 Beardsley Way  
Juneau, AK 99801

---

TO: Alaska Board of Game  
P.O. Box 115526  
Juneau, AK 99811-5526

FROM: Margaret Enders  
5612 E 40th Ave B303  
Anchorage, AK 99504

SUBJECT: Support Board of Game Proposals #5, #59, and #60

DATE: January 28, 2010 02:18 PM

---

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

--Proposals #59 and #60 are reasonable and provide clear understandable boundaries.

I also urge you to support Proposal #5, submitted by the National Park Service, to exempt park lands from two new hunting rules meant to decrease black bear populations in Denali and Gates of the Arctic national preserves. Hunting bears in their dens with artificial light and allowing cubs and sows with cubs to be hunted at their dens is predator control and has no place in a national park unit.

Thank you for considering my comments.

Sincerely,  
Margaret Enders  
5612 E 40th Ave B303  
Anchorage, AK 99504

**Lynnda Strong**

---

2309 Halibut Point Road, #34 , Sitka, AK 99835

January 28, 2010 01:57 PM

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

--Proposals #59 and #60 are reasonable and provide clear understandable boundaries.

I also urge you to support Proposal #5, submitted by the National Park Service, to exempt park lands from two new hunting rules meant to decrease black bear populations in Denali and Gates of the Arctic national preserves. Hunting bears in their dens with artificial light and allowing cubs and sows with cubs to be hunted at their dens is predator control and has no place in a national park unit.

Thank you for considering my comments.

Sincerely,  
Lynnda Strong  
2309 Halibut Point Road, #34  
Sitka, AK 99835

## Melissa Ward

---

65 West James Place , Iselin, NJ 08830

February 3, 2010 06:04 PM

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

--Proposals #59 and #60 are reasonable and provide clear understandable boundaries.

I also urge you to support Proposal #5, submitted by the National Park Service, to exempt park lands from two new hunting rules meant to decrease black bear populations in Denali and Gates of the Arctic national preserves. Hunting bears in their dens with artificial light and allowing cubs and sows with cubs to be hunted at their dens is predator control and has no place in a national park unit.

Thank you for considering my comments.

Sincerely,  
Melissa Ward  
65 West James Place  
Iselin, NJ 08830

---

TO: Alaska Board of Game  
P.O. Box 115526  
Juneau, AK 99811-5526

FROM: Walter Parker  
3724 Campbell Airstrip Road  
Anchorage, AK 99504

SUBJECT: Support Board of Game Proposals #5, #59, and #60

DATE: January 28, 2010 03:07 PM

---

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

--Proposals #59 and #60 are reasonable and provide clear understandable boundaries.

I also urge you to support Proposal #5, submitted by the National Park Service, to exempt park lands from two new hunting rules meant to decrease black bear populations in Denali and Gates of the Arctic national preserves. Hunting bears in their dens with artificial light and allowing cubs and sows with cubs to be hunted at their dens is predator control and has no place in a national park unit.

Thank you for considering my comments.

Sincerely,  
Walter Parker  
3724 Campbell Airstrip Road  
Anchorage, AK 99504

**lori weber**

---

605 hale st. , johnson city, TN 37601/3455

February 6, 2010 03:32 PM

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

--Proposals #59 and #60 are reasonable and provide clear understandable boundaries.

I also urge you to support Proposal #5, submitted by the National Park Service, to exempt park lands from two new hunting rules meant to decrease black bear populations in Denali and Gates of the Arctic national preserves. Hunting bears in their dens with artificial light and allowing cubs and sows with cubs to be hunted at their dens is predator control and has no place in a national park unit.

Thank you for considering my comments.

Sincerely,  
lori weber  
605 hale st.  
johnson city, TN 37601/3455

## Kari Peters

---

1150 S Colony Way PMB 173 , ♦ Palmer, AK 99645

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

--Proposals #59 and #60 are reasonable and provide clear understandable boundaries.

I also urge you to support Proposal #5, submitted by the National Park Service, to exempt park lands from two new hunting rules meant to decrease black bear populations in Denali and Gates of the Arctic national preserves. Hunting bears in their dens with artificial light and allowing cubs and sows with cubs to be hunted at their dens is predator control and has no place in a national park unit.

Thank you for considering my comments.

Sincerely,  
Kari Peters  
1150 S Colony Way PMB 173  
Palmer, AK 99645

January 28, 2010 02:10 PM  
202-659-0650

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

--Proposals #59 and #60 are reasonable and provide clear understandable boundaries.

I also urge you to support Proposal #5, submitted by the National Park Service, to exempt park lands from two new hunting rules meant to decrease black bear populations in Denali and Gates of the Arctic national preserves. Hunting bears in their dens with artificial light and allowing cubs and sows with cubs to be hunted at their dens is predator control and has no place in a national park unit.

Thank you for considering my comments.

Sincerely,  
Skylar Arend  
16300 Sandpiper Dr.  
Anchorage, AK 99516

January 28, 2010 03:08 PM  
202-659-0650

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

--Proposals #59 and #60 are reasonable and provide clear understandable boundaries.

I also urge you to support Proposal #5, submitted by the National Park Service, to exempt park lands from two new hunting rules meant to decrease black bear populations in Denali and Gates of the Arctic national preserves. Hunting bears in their dens with artificial light and allowing cubs and sows with cubs to be hunted at their dens is predator control and has no place in a national park unit.

Thank you for considering my comments.

Sincerely,  
Tim Ewing  
po box 141716  
Anchorage, AK 99514

---

TO: Alaska Board of Game  
P.O. Box 115526  
Juneau, AK 99811-5526

FROM: Rebecca Goodrich  
905 Richardson Vista #22  
Anchorage, AK 99501

SUBJECT: Support Board of Game Proposals #5, #59, and #60

DATE: January 30, 2010 03:10 PM

---

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

--Proposals #59 and #60 are reasonable and provide clear understandable boundaries.

I also urge you to support Proposal #5, submitted by the National Park Service, to exempt park lands from two new hunting rules meant to decrease black bear populations in Denali and Gates of the Arctic national preserves. Hunting bears in their dens with artificial light and allowing cubs and sows with cubs to be hunted at their dens is predator control and has no place in a national park unit.

Thank you for considering my comments.

Sincerely,  
Rebecca Goodrich  
905 Richardson Vista #22  
Anchorage, AK 99501

February 1, 2010 01:54 AM  
202-659-0650

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the buffer zones you have designated in the past which have protected the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

--Proposals #59 and #60 are reasonable and provide clear understandable boundaries.

I also urge you to support Proposal #5, submitted by the National Park Service, to exempt park lands from two new hunting rules meant to decrease black bear populations in Denali and Gates of the Arctic national preserves. Hunting bears in their dens with artificial light and allowing cubs and sows with cubs to be hunted at their dens is predator control and has no place in a national park unit.

Thank you for considering my comments.

Sincerely,  
Dave Johnston  
PO Box 711  
Talkeetna, AK 99676

## Shelley True

---

HC 60 PO Box 3409 , Haines, AK 99827

January 29, 2010 02:35 AM

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

--Proposals #59 and #60 are reasonable and provide clear understandable boundaries.

I also urge you to support Proposal #5, submitted by the National Park Service, to exempt park lands from two new hunting rules meant to decrease black bear populations in Denali and Gates of the Arctic national preserves. Hunting bears in their dens with artificial light and allowing cubs and sows with cubs to be hunted at their dens is predator control and has no place in a national park unit.

Thank you for considering my comments.

Sincerely,  
Shelley True  
HC 60 PO Box 3409  
Haines, AK 99827

TO: Alaska Board of Game  
P.O. Box 115526  
Juneau, AK 99811-5526

FROM: Morningstar Elicerio  
850 Redpoll  
Fairbanks, AK 99710

SUBJECT: Support Board of Game Proposals #5, #59, and #60

DATE: January 29, 2010 04:12 PM

---

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

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I also urge you to support Proposal #5, submitted by the National Park Service, to exempt park lands from two new hunting rules meant to decrease black bear populations in Denali and Gates of the Arctic national preserves. Hunting bears in their dens with artificial light and allowing cubs and sows with cubs to be hunted at their dens is predator control and has no place in a national park unit.

Thank you for considering my comments.

Sincerely,  
Morningstar Elicerio  
850 Redpoll  
Fairbanks, AK 99710

January 28, 2010 04:52 PM  
202-659-0650

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

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I also urge you to support Proposal #5, submitted by the National Park Service, to exempt park lands from two new hunting rules meant to decrease black bear populations in Denali and Gates of the Arctic national preserves. Hunting bears in their dens with artificial light and allowing cubs and sows with cubs to be hunted at their dens is predator control and has no place in a national park unit.

Thank you for considering my comments.

Sincerely,  
Lorraine Maloof  
3333 Sun Valley Drive  
Eagle River, AK 99577

January 28, 2010 03:03 PM  
202-659-0650

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

As a citizen of Alaska for many years, of the US and our planet earth, I urge you to continue to protect the bears and wolves in Denali and Gates of the Arctic with the protective buffer zones. These animals are two of our most precious resources in Denali and essential parts of the ecosystem.

Hunting bears in their dens with artificial lighting and other methods should never be allowed in our parks. It is shocking that there has been this or any method of predator control. Please let's not allow our wild parks, where nature runs as it is supposed to, go the way of those in the Lower 48.

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

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Thank you for considering my comments.  
Carol Clemens

Sincerely,  
Carol Clemens  
PO Box 669  
Palmer, AK 99645

---

TO: Alaska Board of Game  
P.O. Box 115526  
Juneau, AK 99811-5526

FROM: Elizabeth Dowdy  
2150 Laura Street, #64  
Springfield, OR 97477

SUBJECT: Support Board of Game Proposals #5, #59, and #60

DATE: January 28, 2010 08:19 PM

---

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

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Thank you for considering my comments. I do not presently live in Alaska, but lived there for 10 years, and probably will be back next year.

Sincerely,  
Elizabeth Dowdy  
2150 Laura Street, #64  
Springfield, OR 97477

**R C Shorb**

---

5202 Wyoming Rd , Bethesda, MD 20816

February 3, 2010 06:06 AM

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

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Thank you for considering my comments.

Sincerely,  
R C Shorb  
5202 Wyoming Rd  
Bethesda, MD 20816

## Tammy Scroggs

---

9400 Glacier Hwy #2141 , ♦ Juneau, AK 99801

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

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Thank you for considering my comments.

Sincerely,  
Tammy Scroggs  
9400 Glacier Hwy #2141  
Juneau, AK 99801

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

I am writing to oppose proposals 56, 57, 61, 62, 63, and 64, which would shrink or eliminate the current buffers around Denali National Park.

I am writing to support proposals 55, 58, 59, 60, and 65 which would expand the current buffers to provide additional areas where wolves would not be subject to trapping and hunting.

Few individuals would be impacted by the increased buffers, which are not excessive, since thousands of acres are available outside of the buffers for wolf hunting and trapping. Hundreds of thousands of visitors will have increased opportunities to view Denali's Toklat wolves.

Thank you for your consideration,

William Taylor  
1087 Tanland Dr Apt 104  
Palo Alto, CA 94303

---

TO: Alaska Board of Game  
P.O. Box 115526  
Juneau, AK 99811-5526

FROM: Becky Hoffman  
175 Church #5  
Spring City, PA 19475

SUBJECT: Support Board of Game Proposals #5, #59, and #60

DATE: February 9, 2010 09:07 PM

---

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

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Thank you for considering my comments.

Sincerely,  
Becky Hoffman  
175 Church  
#5  
Spring City, PA 19475

## Lilla Fortunoff

---

p.o.box 260 , ♦ talkeetna, AK 99676

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

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Thank you for considering my comments.

Sincerely,  
Lilla Fortunoff  
p.o.box 260  
talkeetna, AK 99676

---

TO: Alaska Board of Game  
P.O. Box 115526  
Juneau, AK 99811-5526

FROM: Dale Kelley  
4451 Dearmoun Rd  
Anchorage, AK 99516

SUBJECT: Support Board of Game Proposals #5, #59, and #60

DATE: January 28, 2010 01:08 PM

---

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

--Proposals #59 and #60 are reasonable and provide clear understandable boundaries.

I also urge you to support Proposal #5, submitted by the National Park Service, to exempt park lands from two new hunting rules meant to decrease black bear populations in Denali and Gates of the Arctic national preserves. Hunting bears in their dens with artificial light and allowing cubs and sows with cubs to be hunted at their dens is predator control and has no place in a national park unit.

Thank you for considering my comments.

Sincerely,  
Dale Kelley  
4451 Dearmoun Rd  
Anchorage, AK 99516

## Kathy East

---

1610 Silver Pines Rd. , ♦ Kenai, AK 99611

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

--Proposals #59 and #60 are reasonable and provide clear understandable boundaries.

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Thank you for considering my comments.

Sincerely,  
Kathy East  
1610 Silver Pines Rd.  
Kenai, AK 99611

---

TO: Alaska Board of Game  
P.O. Box 115526  
Juneau, AK 99811-5526

FROM: Patricia Kinnunen  
1930 E. 56th Ave  
Anchorage, AK 995071609

SUBJECT: Support Board of Game Proposals #5, #59, and #60

DATE: January 30, 2010 04:15 PM

---

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

--Proposals #59 and #60 are reasonable and provide clear understandable boundaries.

I also urge you to support Proposal #5, submitted by the National Park Service, to exempt park lands from two new hunting rules meant to decrease black bear populations in Denali and Gates of the Arctic national preserves. Hunting bears in their dens with artificial light and allowing cubs and sows with cubs to be hunted at their dens is predator control and has no place in a national park unit.

Thank you for considering my comments.

Sincerely,  
Patricia Kinnunen  
1930 E. 56th Ave  
Anchorage, AK 99507-1609

## Mary Helen Stephens

---

Po Box 1272 , ♦ Valdez, AK 99686

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

I do not hunt nor trap, but am not opposed to legitamate hunting or trapping. I am violently opposed to outright killing of any form of life. We need a natural control of wildlife - letting nature balance populations the way it is done if we keep out of it. Wildlife have their own boundaries according to food supply available. Buffer zones are great, however animals aren't going to know to respond to manmade boundaries. We have to be able to recognize that fact.

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

--Proposals #59 and #60 are reasonable and provide clear understandable boundaries.

I also urge you to support Proposal #5, submitted by the National Park Service, to exempt park lands from two new hunting rules meant to decrease black bear populations in Denali and Gates of the Arctic national preserves. Hunting bears in their dens with artificial light and allowing cubs and sows with cubs to be hunted at their dens is predator control and has no place in a national park unit.

Thank you for considering my comments.

Sincerely,  
Mary Helen Stephens

Po Box 1272  
Valdez, AK 99686

## **Brenda Martin**

---

PO Box 57027 , North Pole, AK 99705

January 28, 2010 10:50 PM

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

--Proposals #59 and #60 are reasonable and provide clear understandable boundaries.

I also urge you to support Proposal #5, submitted by the National Park Service, to exempt park lands from two new hunting rules meant to decrease black bear populations in Denali and Gates of the Arctic national preserves. Hunting bears in their dens with artificial light and allowing cubs and sows with cubs to be hunted at their dens is predator control and has no place in a national park unit.

Thank you for considering my comments.

Sincerely,  
Brenda Martin  
PO Box 57027  
North Pole, AK 99705

February 1, 2010 01:11 PM  
202-659-0650

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

--Proposals #59 and #60 are reasonable and provide clear understandable boundaries.

I also urge you to support Proposal #5, submitted by the National Park Service, to exempt park lands from two new hunting rules meant to decrease black bear populations in Denali and Gates of the Arctic national preserves. Hunting bears in their dens with artificial light and allowing cubs and sows with cubs to be hunted at their dens is predator control and has no place in a national park unit.

Thank you for considering my comments.

Sincerely,  
bonnie spromberg  
827 peterson st.  
ketchikan, AK 99901-6522

January 28, 2010 07:46 PM  
202-659-0650

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well. I would like to keep the buffer zones because Denali is one of the few places where anyone has a chance of seeing wild wolves. People come from all over the country and the world for the chance of seeing our "Big 5."

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

--Proposals #59 and #60 are reasonable and provide clear understandable boundaries.

I also urge you to support Proposal #5, submitted by the National Park Service, to exempt park lands from two new hunting rules meant to decrease black bear populations in Denali and Gates of the Arctic national preserves. Hunting bears in their dens with artificial light and allowing cubs and sows with cubs to be hunted at their dens is predator control and has no place in a national park unit.

Thank you for considering my comments.

Sincerely,  
Liz Hamilton  
P.O. Box 131  
Denali Park, AK 99755

## Christopher Ciancibelli

---

2001 Milky Way , ♦ Fairbanks, AK 99712

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

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Thank you for considering my comments.

Sincerely,  
Christopher Ciancibelli  
2001 Milky Way  
Fairbanks, AK 99712

## Barbara Poss

---

Box 111477 , ♦ Anchorage, AK 99511

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

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Thank you for considering my comments.

Sincerely,  
Barbara Poss  
Box 111477  
Anchorage, AK 99511

---

TO: Alaska Board of Game  
P.O. Box 115526  
Juneau, AK 99811-5526

FROM: Nathaniel Perry  
PO Box 02  
Shaktoolik, AK 99771

SUBJECT: Support Board of Game Proposals #5, #59, and #60

DATE: January 29, 2010 01:41 AM

---

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

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Thank you for considering my comments.

Sincerely,  
Nathaniel Perry  
PO Box 02  
Shaktoolik, AK 99771

## Kaarle Strailey

---

2240 railroad dr , ♦ Fairbanks, AK 99709

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

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Thank you for considering my comments.

Sincerely,  
Kaarle Strailey  
2240 railroad dr  
Fairbanks, AK 99709

---

TO: Alaska Board of Game  
P.O. Box 115526  
Juneau, AK 99811-5526

FROM: Martin Antuna  
6416 15th Court, #A  
Elmendorf Afb, AK 99506

SUBJECT: Support Board of Game Proposals #5, #59, and #60

DATE: January 29, 2010 06:51 AM

---

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

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I also urge you to support Proposal #5, submitted by the National Park Service, to exempt park lands from two new hunting rules meant to decrease black bear populations in Denali and Gates of the Arctic national preserves. Hunting bears in their dens with artificial light and allowing cubs and sows with cubs to be hunted at their dens is predator control and has no place in a national park unit.

Thank you for considering my comments.

Sincerely,  
Martin Antuna  
6416 15th Court, #A  
Elmendorf Afb, AK 99506

## Dave Wellman

---

HC60 Box 227 , ♦ Copper Center, AK 99573

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

--Proposals #59 and #60 are reasonable and provide clear understandable boundaries.

I also urge you to support Proposal #5, submitted by the National Park Service, to exempt park lands from two new hunting rules meant to decrease black bear populations in Denali and Gates of the Arctic national preserves. Hunting bears in their dens with artificial light and allowing cubs and sows with cubs to be hunted at their dens is unsportsmanlike and has no place in Alaska, especially in a national park unit.

Thank you for considering my comments.

Sincerely,  
Dave Wellman  
HC60 Box 227  
Copper Center, AK 99573

## Jan Edwards

---

1085 Main St. P. O. Box 136, ♦ Skagway, AK 99840

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

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Thank you for considering my comments.

Sincerely,  
Jan Edwards  
1085 Main St.  
P. O. Box 136  
Skagway, AK 99840

January 28, 2010 03:41 PM  
202-659-0650

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

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Thank you for considering my comments.

Sincerely,  
gretchen small  
po box 9554  
ketchikan, AK 99901

---

TO: Alaska Board of Game  
P.O. Box 115526  
Juneau, AK 99811-5526

FROM: H Baker  
unpublished  
Fort Wayne, IN 46818

SUBJECT: Support Board of Game Proposals #5, #59, and #60

DATE: February 14, 2010 01:13 AM

---

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

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Thank you for considering my comments.

Sincerely,  
H Baker  
unpublished  
Fort Wayne, IN 46818

January 28, 2010 02:38 PM  
202-659-0650

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

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Thank you for considering my comments.

Sincerely,  
Randal Smith  
8620 e westside drive  
Palmer, AK 99645

## Courtney Lewis

---

1801 w 48th ave apt 113 , Anchorage, AK 99517

February 1, 2010 09:15 PM

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

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Thank you for considering my comments.

Sincerely,  
Courtney Lewis  
1801 w 48th ave apt 113  
Anchorage, AK 99517

---

TO: Alaska Board of Game  
P.O. Box 115526  
Juneau, AK 99811-5526

FROM: Jacqueline Siegel  
PO Box 1136  
Talkeetna, AK 99676

SUBJECT: Support Board of Game Proposals #5, #59, and #60

DATE: January 28, 2010 01:01 PM

---

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

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--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

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Thank you for considering my comments.

Sincerely,  
Jacqueline Siegel  
PO Box 1136  
Talkeetna, AK 99676

---

TO: Alaska Board of Game  
P.O. Box 115526  
Juneau, AK 99811-5526

FROM: Janis Quinn  
10905 126th Ave NE  
Kirkland, WA 98033

SUBJECT: Support Board of Game Proposals #5, #59, and #60

DATE: January 28, 2010 06:58 PM

---

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

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Thank you for considering my comments.

Sincerely,  
Janis Quinn  
10905 126th Ave NE  
Kirkland, WA 98033

January 29, 2010 04:40 PM  
202-659-0650

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

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Thank you for considering my comments.

Sincerely,  
Megan Deaton  
12113 Lanham Severn Rd  
Bowie, MD 20720

January 28, 2010 06:14 PM  
202-659-0650

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

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Thank you for considering my comments.

Sincerely,  
Amy Peloza  
4431 Edinburgh Drive  
Anchorage, AK 99502

330 N. Searsport Rd.  
Swanville, Me. 04915  
February 8, 2010

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

To Whom It May Concern,

I am writing to urge you to support proposals 55, 58, 59, 60 and 65. These proposals would expand the buffer zone to protect wolves adjacent to Denali National Park.

As a past artist-in-residence in Denali National Park the highlight of my residency was seeing a wolf along the East Fork of the Tolkat River. Many visitors to Alaska travel from the lower forty eight in order to see Alaska's magnificent wildlife. My residency was my second trip to Alaska and I hope to return again, but if Alaska keeps up its war on wolves that future trip remains on hold.

Sincerely,

A handwritten signature in cursive script that reads "Janice Kasper". The signature is written in black ink and is positioned below the word "Sincerely,".

Janice Kasper

## Dael Devenport

---

2280 Black Spruce Ct , ♦ Fairbanks, AK 99709

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

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Thank you for considering my comments.

Sincerely,  
Dael Devenport  
2280 Black Spruce Ct  
Fairbanks, AK 99709

## Ann Yates

---

PO Box 233544 , Anchorage, AK 99523

January 28, 2010 02:16 PM

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

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--The percentage of park wolves killed by hunting and trapping has increased tremendously in the last six years (from 17% to 30%) and the current population is currently at 65--the lowest recorded number since the 1980s.

--Proposals #59 and #60 are reasonable and provide clear understandable boundaries.

I also urge you to support Proposal #5, submitted by the National Park Service, to exempt park lands from two new hunting rules meant to decrease black bear populations in Denali and Gates of the Arctic national preserves. Hunting bears in their dens with artificial light and allowing cubs and sows with cubs to be hunted at their dens is predator control and has no place in a national park unit.

Thank you for considering my comments.

Sincerely,  
Ann Yates  
PO Box 233544  
Anchorage, AK 99523

## **Kathy Doty**

---

5500 Kennyhill Dr. , Anchorage, AK 99504

January 29, 2010 04:04 PM

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

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Thank you for considering my comments.

Sincerely,  
Kathy Doty  
5500 Kennyhill Dr.  
Anchorage, AK 99504

TO: Alaska Board of Game  
P.O. Box 115526  
Juneau, AK 99811-5526

FROM: Bill Larson  
7227 Bern Street  
Anchorage, AK 99507

SUBJECT: Support Board of Game Proposals #5, #59, and #60

DATE: January 28, 2010 01:31 PM

---

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

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Thank you for considering my comments.

Sincerely,  
Bill Larson  
7227 Bern Street  
Anchorage, AK 99507

## Jeanette Hanneman

---

3325 N. Bald Eagle Dr , ♦ Wasilla, AK 99654

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

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Thank you for considering my comments.

Sincerely,  
Jeanette Hanneman  
3325 N. Bald Eagle Dr  
Wasilla, AK 99654

## Chris Scaffa

---

55 Jeanine Court , Manalapan, NJ 07726

January 29, 2010 04:21 PM

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

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Thank you for considering my comments.

Sincerely,  
Chris Scaffa  
55 Jeanine Court  
Manalapan, NJ 07726

## Leslie Law

---

19928 Cohen Dr. , ♦ Juneau, AK 99801

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

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Thank you for considering my comments.

Sincerely,  
Leslie Law  
19928 Cohen Dr.  
Juneau, AK 99801

---

TO: Alaska Board of Game  
P.O. Box 115526  
Juneau, AK 99811-5526

FROM: Connie Newman  
PO Box 56  
Pelican, AK 99832

SUBJECT: Support Board of Game Proposals #5, #59, and #60

DATE: January 28, 2010 02:29 PM

---

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

--Denali National Park is one of the best places in the world for visitors to see wolves in the wild and as an Alaskan resident, I value that opportunity as well.

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Thank you for considering my comments.

Sincerely,  
Connie Newman  
PO Box 56  
Pelican, AK 99832

January 28, 2010 11:02 PM  
202-659-0650

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

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Thank you for considering my comments.

Sincerely,  
Marilyn Scarborough  
17001 Aries Ct  
Anchorage, AK 99516

## Dorothy Thompson

---

P. O. Box 80368 3333 Deniki Lane, ♦ Fairbanks, AK 99708

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

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Thank you for considering my comments.

Sincerely,  
Dorothy Thompson  
P. O. Box 80368  
3333 Deniki Lane  
Fairbanks, AK 99708

## Robert Cusick

---

5673 Sapphire Loop , ♦ Anchorage, AK 995046001

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

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Thank you for considering my comments.

Sincerely,  
Robert Cusick  
5673 Sapphire Loop  
Anchorage, AK 99504-6001

**Linda Bassett**

---

2940 Mallard Lane , Anchorage, AK 99508

January 29, 2010 08:38 PM

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

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Thank you for considering my comments.

Sincerely,  
Linda Bassett  
2940 Mallard Lane  
Anchorage, AK 99508

## Steven Bergt

---

2600 Draper Drive , ♦ Anchorage, AK 99517-1239

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

Subject: Support Board of Game Proposals #5, #59, and #60

Dear Alaska Board of Game,

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Thank you for considering my comments.

Sincerely,  
Steven Bergt  
2600 Draper Drive  
Anchorage, AK 99517-1239

January 30, 2010 07:43 PM  
202-659-0650

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

Subject: Support Board of Game Proposals #5, #59, and #60

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Thank you for considering my comments.

Sincerely,  
Tara Whitesell  
P.O. Box 82683  
Fairbanks, AK 99708

TO: Alaska Board of Game  
P.O. Box 115526  
Juneau, AK 99811-5526

FROM: Eileen Kopec  
5 Rowe Place Apt 4  
Franklin, NJ 07416

SUBJECT: Support Board of Game Proposals #5, #59, and #60

DATE: February 3, 2010 09:46 AM

---

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

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Thank you for considering my comments.

Sincerely,  
Eileen Kopec  
5 Rowe Place Apt 4  
Franklin, NJ 07416

---

TO: Alaska Board of Game  
P.O. Box 115526  
Juneau, AK 99811-5526

FROM: Luzmila Valadez  
P.O. Box 417  
Ester, AK 99725

SUBJECT: Support Board of Game Proposals #5, #59, and #60

DATE: January 31, 2010 02:22 PM

---

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

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Thank you for considering my comments.

Sincerely,  
Luzmila Valadez  
P.O. Box 417  
Ester, AK 99725

January 29, 2010 03:29 AM  
202-659-0650

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

Subject: Support Board of Game Proposals #5, #59, and #60

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Thank you for considering my comments.

Sincerely,  
Tina Brown  
19400 Beardsley Way  
Juneau, AK 99801

---

TO: Alaska Board of Game  
P.O. Box 115526  
Juneau, AK 99811-5526

FROM: B Slater  
PO Box 2316  
Homer, AK 99603

SUBJECT: Support Board of Game Proposals #5, #59, and #60

DATE: January 29, 2010 02:58 AM

---

Dear Alaska Board of Game,

Thank you for the previous buffer zones you have designated to protect the wolves of Denali National Park from hunting and trapping outside of park boundaries. I support proposals #59 and #60 to renew and expand these buffers for the following reasons:

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Thank you for considering my comments.

Sincerely,  
B Slater  
PO Box 2316  
Homer, AK 99603

Dear AK Fish and Game - I am a Healy resident, and I support **Proposal: 72, Log #I-10S-G-018** and urge the Fairbanks Board of Game to approve it at their meeting Feb 26-March 6. I and my family have had pets/sled dogs in our care caught in traps set IN public trails. Once a trap in a trail endangered my family and turned a five day Dog Sled /Snow Machine trip into a two day exercise in survival. I believe this proposal is the minimum needed to protect us from irresponsible trapping.

Thank You  
David P. Braun

I would hope that the board would limit trapping in Healy. The trapping has caused significant injuries to our adorable pets in the area. There are many places that the trappers can use, but in and around towns are not acceptable. Please support the trapping limits as proposed by Barbara Brease and Gretchen Shaw.

Sincerely,  
Mary Anderson  
Resident of Healy