

Alaska Board of Game

Arctic and Western Regions

Public Comments on Proposed Changes in Regulations

PC1	Alaska Wildlife Alliance
PC2	Fred West
PC3	Alaska Professional Hunters Association
PC4	Native Village of Goodnews Bay
PC5	Jamie Thomton
PC6	Oscar Petersen
PC7	Jen Kain
PC8	Laura Croft
PC9	Kawerak
PC10	Hal Shepard
PC11	Defenders of Wildlife
PC12	Robert D. White
PC13	Michele & Gene Cornelius
PC14	William Bunch
PC15	Edgar Bailey
PC16	Lydia Garvey
PC17	Austin Ahmasuk
PC18	Roberta Highland
PC19	Buck Curry
PC20	Scott Miller
PC21	Patricia Mayhan
PC22	Kathy Henley
PC23	USFWS
PC24	Safari Club International - Alaska Chapter
PC25	Gypsy Vanner
PC26	Maureen Longworth
PC27	Steve Schafer
PC28	Carrie Reed
PC29	Paul Atkins
PC30	Scherel Carver
PC31	Kathy East
PC32	Patricia Cue
PC33	Nina Faust
PC34	Jerry Olive
PC35	William Regan
PC36	Diane Regan

PC37	Rika Mouw
PC38	Marilyn Houser
PC39	Lisa Climo
PC40	Dave Bachrach
PC41	Robert Schlesinger
PC42	Kneeland Taylor
PC43	Hal Shepard
PC44	National Park Service
PC45	Gerald Brookman
PC46	Science Now Project
PC47	Loretta Stadler
PC48	National Parks Conservation Association
PC49	Removed, Duplicate
PC50	Mary Griswold
PC51	Safari Club International-Kenai Chapter
PC52	Thomas Meacham
PC53	Hal Shepard
PC54	Wade Wahrenbrock
PC55	Robert D. White
PC56	Rhonda Lanier
PC57	George Matz
PC58	Justine Pechuzal
PC59	Diane Bentivegna
PC60	Roberta Highland
PC61	Hal Shepherd
PC62	Dori Broglino
PC63	Anne Wilson
PC64	Kimberly Kellar
PC65	Yamini Venkatachalam
PC66	Mary La Fever
PC67	Karma Torres
PC68	Amber Washington
PC69	Katherine Mitchell
PC70	Deb Russell
PC71	E Lee North
PC72	Peter Langley
PC73	Steven Clevidence
PC74	Linda Sampson
PC75	Susan Green
PC76	Iris Gallegos
PC77	John Porter
PC78	Chantal Buslot
PC79	Me Quimby

PC80	Sherry Dion
PC81	Jeanne Fedel
PC82	Dr I de Baintner
PC83	Horst Helmut
PC84	Lynn Driessen
PC85	Brian Smith
PC86	Marc Cooke
PC87	Mark Balitzer
PC88	Martha Siebe
PC89	Maria Torres
PC90	Kristi Machon
PC91	Anthony Conforti
PC92	Janice Golub
PC93	Art Greenwalt
PC94	Diane Bentivegna
PC95	Zucker Family
PC96	Gregory Haussmann
PC97	Mary Jo Graham
PC98	Scott
PC99	Carol Biggs
PC100	Ravi Madapati
PC101	Irene Brady
PC102	Meredith Autrey
PC103	Sharon Baur
PC104	Donna Quante
PC105	John Tyler
PC106	Bonnie McCartney
PC107	Christa Burg
PC108	Leslie Davies
PC109	Brad De Noble
PC110	Matthew Thompson
PC111	Fran Greenaway
PC112	Debbie Brush
PC113	Johanna Bakker
PC114	Bob Gengler
PC115	Linda Taylor
PC116	Susan Valenti
PC117	Lin Davis
PC118	Peter McCallum
PC119	Anthony Chiffolo
PC120	Michael Banks
PC121	Anne Christian
PC122	Dorothy McCorkle

PC123	Greg Goodmacher
PC124	Katharine Richardson
PC125	Karen Walker
PC126	Joan Beldin
PC127	Diane Angelino
PC128	David Cannon
PC129	Brittanny Norton
PC130	Charmi Weker
PC131	Christopher & Virginia Jones
PC132	Rebecca Elgin
PC133	Karen Hackey
PC134	Linda Wagner
PC135	Biff Ewers
PC136	Jane Heltebrake
PC137	Jim & Joy Ames
PC138	Cherish Bahr
PC139	Larry Casey & Family
PC140	Laura Kiesel
PC141	Louise Kane
PC142	Florence Stasch
PC143	Katarina Flynn
PC144	Mary Rothschild
PC145	Corinne Conlon
PC146	Gary Voeste
PC147	Jennifer Meyer
PC148	Ty Beh
PC149	Jan St Peters
PC150	Lee Ann Stiff
PC151	Robert Watson
PC152	Ken Ross
PC153	Pat
PC154	Jeff Sloss
PC155	Bonny Schumaker
PC156	Dan Larivey
PC157	Mary Willson
PC158	Leslie Baker
PC159	Dr Michael & Joyce Huesemann
PC160	Sue Forbes



THE ALASKA WILDLIFE ALLIANCE

"LETTING NATURE RUN WILD"

October 27, 2011

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

RECEIVED

OCT 28 2011

**BOARDS
ANCHORAGE**

Via Facsimile: 907-465-6094

To Members of the Alaska Board of Game:

The Alaska Wildlife Alliance (AWA) herewith submits its written comments on proposals to be considered at the **Arctic and Western Regions Meeting**, November 11 -14, 2011 in Barrow, Alaska.

AWA's Mission Statement

The Alaska Wildlife Alliance is a non-profit organization committed to the conservation and protection of Alaska's wildlife. We promote the integrity, beauty, and stability of Alaska's ecosystems, support true subsistence hunting, and recognize the intrinsic value of wildlife. The AWA works to achieve and maintain balanced ecosystems in Alaska managed with the use of sound science to preserve wildlife for present and future generations.

Thank you for considering our comments.

Yours truly,



John Toppenberg
Director



AWA's Comments on the Alaska Board of Game Proposals
Arctic and Western Regions Meeting
(Missing proposal numbers indicates "no comment")

PROPOSAL #	COMMENT
1	SUPPORT This proposal would reduce the bull-cow musk oxen ratio which if not reduced the musk oxen population will exceed the carrying capacity on Nunivak Island where the species has no predators. Hunting permits for bull musk oxen will increase from current 35 permits to 50.
6	OPPOSE AWA prioritizes subsistence hunting. This proposal would encourage urban sport hunts in remote areas. AWA prioritizes rural subsistence hunting and therefore opposes this proposal. <i>This proposal will not be reviewed by the BOG until March 2012.</i>
7	SUPPORT This proposal would increase harvest of cow moose, thereby decreasing the current moose population which has reached habitat/forage carrying capacity.
8	SUPPORT This proposal would lengthen the hunt season and liberalize bag limits for moose. These actions would decrease the ample and growing moose population which is causing concern. This liberalized hunt would be allowed for resident hunters only.
9	SUPPORT This proposal would increase cow and antlerless moose harvests to keep moose populations from increasing to numbers which could exceed the habitat/forage carrying capacity in GMU 18.
10	OPPOSE This proposal would legalize the method and means of hunting moose with electric calls. This is unsportsmanlike behavior which violates the hunting ethic of fair chase. The liberalized harvest of cow moose should be sufficient in addressing the concern of the growing moose population.
11	OPPOSE This proposal would legalize the use of salt licks when hunting for moose. This method is unsportsmanlike and violates the hunting ethic of fair chase. It is reminiscent of baiting black bears which AWA strongly opposes.
12	OPPOSE This proposal would legalize the use of a 'moving' boat to hunt moose. Currently the hunter may shoot moose from a 'stopped' boat. This method is unsportsmanlike and violates the ethic of fair chase.



- 13 **SUPPORT** This proposal entails redefining the Amount Necessary for Subsistence users of wolves in the Arctic Region GMUs. The impetus for this proposal comes from the Alaska State Constitution which ensures that Alaska's natural resources be equally available to all Alaskans. The reformulation of the ANS would include all Alaskans who have historically used wolves for cultural and traditional purposes. Currently the ANS focuses on cultural and traditional users from the Arctic Region only, therefore not allocating a percentage of the wolf population for all Alaskan subsistence users of wolves.
- 14 **SUPPORT** This proposal would halt the harvest of certain furbearing species in the Arctic Region GMUs by nonresident trappers and hunters. The reasoning is that 100% of the allowable harvest, ANS, is needed to meet resident Alaskans' cultural and traditional subsistence uses.
- 15 **OPPOSE** This proposal requests an increase of bag limits for wolves from 5 to 10 in GMU 18. Scientific findings need to be implemented to determine if such an increase would maintain a sustainable yield.
- 16 **OPPOSE** This proposal requests an increased bag limit for wolverine from 1 to 2. Scientific findings should be implemented to determine how such an increase would impact sustainable yield.
- 17 **OPPOSE** This proposal would increase the bag limit of lynx in GMU 18 from 2 to 5 per season. The limit should not be changed until scientific findings determine that such an increase will not negatively impact sustainable yield.
- 18 **SUPPORT** This proposal clarifies language in the statute concerning incidental catch regarding a regulatory year versus a calendar year. This clarification will be beneficial for trappers and for enforcement personnel.
- 19 **SUPPORT** This proposal would halt the harvest of certain furbearing species by nonresidents in GMUs 18, 22, 23, and 26A to meet the Constitutionally mandated ANS quota. The allowable harvest, after calculating sustainable yield principles, would eliminate all nonresident harvest of furbearers in the specified GMUs.
- 20 **OPPOSE** This proposal would Increasing the bag limit of ptarmigan and lengthen the season. Neither should occur until scientific findings determine that liberalized hunting will not aversively impact sustainable yield.
- 23 **OPPOSE** This proposal would allow review of the discretionary authority requiring the nullification of trophy value of animals taken under a subsistence permit. While AWA supports subsistence hunting, if horns and antlers are



not destroyed, there is an added incentive to shoot in order to sell these trophies. Additionally, there would be no way to tell whether the trophies had been obtained illegally or illegally. Allowing this practice in one area would invite demand to allow it in other areas, which would likely lead to more problems.

24 **OPPOSE** This proposal would align the brown bear season in GMU 22C with that of the remainder of the unit. Essentially, the proposal calls for the use of predator control measures with no scientific data to support the need for such action. We suggest that if the sponsor of this proposal believes that bear concerns warrant predator control measures in GMU 22C, he request the BOG to direct ADF&G to undertake field studies to properly evaluate the situation.

25 **OPPOSE** This proposal would align the brown bear seasons in GMU 22, but no data are provided to support the change. We suggest that if the sponsor of this proposal believes that the proposed change is necessary, he request the BOG to direct ADF&G to undertake field studies to properly evaluate the situation.

26 **OPPOSE** This proposal calls for a year-round season for brown bears in GMU 22. Essentially, the proposal calls for the use of predator control measures with no scientific data to support the need for such action. It seems highly unlikely that a year-round brown bear season is warranted; nevertheless, if the sponsor of this proposal believes that it is, we suggest he request the BOG to direct ADF&G to undertake field studies to properly evaluate the situation.

29 **OPPOSE** This proposal calls for an allocation of 50% of the GMU 23 moose permits for DM875 to guides. Because situations and conditions change with time, it would be irresponsible to support such a proposal. Additionally, if this proposal were adopted, it would be difficult to change it as time passes.

30 **SUPPORT** This proposal would establish a harvest objective for brown bear in the Noatak National Preserve. All user groups would benefit from establishing and maintaining a long-term harvest strategy that promotes stability of the brown bear population in the Preserve.

32 **OPPOSE** This proposal would add GMU 26A to the list of areas where a resident brown bear tag is not required for hunts. The sponsor states that this measure is necessary because observations indicate healthy brown bear populations, and brown bears are breaking into cabins and camps in the unit. He goes on to state that it is unlikely that



the proposed change would greatly increase bear harvest. If the proposal would not increase bear harvest, then the proposal is unnecessary. If, however, the sponsor continues to believe that the proposal should be adopted, then we suggest he request the BOG to direct ADF&G to undertake field studies to properly evaluate the situation.

OPPOSE This proposal calls for an earlier opening of the wolverine hunting season in GMU 26. The sponsor states that this action is necessary because many hunters are hunting sheep, caribou, and/or bears during the wolverine season, so they are unable to hunt wolverines.

While hunting seasons are not established simply for the convenience of the hunters, if the sponsor believes that the wolverine hunting season in GMU 26 should be extended, we suggest he request the BOG to direct ADF&G to undertake field studies to properly evaluate the situation.

Proposal 35 OPPOSE (AWA hereby adopts the comments on this proposal made by Defenders of Wildlife)

This proposal, if adopted, would approve an intensive management plan for moose in 15A.

Firstly, we have substantial concerns over the fact that the BOG has inhibited public participation by providing ADF&G insufficient time for this plan to be developed thus preventing its inclusion in the November proposal book. The BOG has further hampered participation by considering this proposal in Barrow far from the communities that will be directly affected by the BOG's decision. We have outlined such concerns in past comments to the BOG and consider the continuation of such practices to be detrimental to the public process through which such controversial proposals are adopted. We request, in the very least, that consideration of this plan be moved to the January meeting in Anchorage in order to allow for participation of individuals who will be directly impacted should the proposal pass.

During the March 2011 meeting, the BOG directed the ADF&G to develop an intensive management plan that included aerial wolf control for 15A. The preliminary plan was released October 17th, 2011 and included aerial control of wolves. We vigorously oppose aerial wolf control in Unit 15A. Wolf control is not biologically warranted, appropriate, or feasible in Unit 15A.

At the March meeting, ADF&G supplied a Feasibility Assessment (FA) for intensive management in 15A (see attached Record Copy 23 and Proposal 174). Though the FA was conducted with the goal of describing the feasibility of a habitat based intensive management plan, it also addressed the limitations of conducting a predator control program in 15A.



In the FA, ADF&G biologists recognized that habitat was limiting moose population growth in 15A. Further, ADF&G recognized that the current moose population objectives for 15A were too high. A proposal recommending the moose population objectives be lowered was submitted by ADF&G for the March meeting and, despite extensive biological evidence that such a reduction was necessary, was rejected by the BOG. Due to the widely recognized habitat limitations in 15A, ADF&G also stated in their FA that "if predator densities were reduced to increase moose numbers without concomitant wide-spread improvements to the habitat any increases to moose survival would further increase the nutritional stress of the moose population thereby reducing productivity."

The recognition that habitat, rather than predation, is limiting moose population growth in 15A is also demonstrated by recent media coverage of this issue. The regional ADF&G biologist who was responsible for drafting the plan stated "The reason we had conducted the survey [in 15A] was due to the chronic decline in moose numbers, which was predicted by the department based on changes in habitat. Fifteen A has a rich history in wildfires that changes the habitat. This greatly benefits moose browse and increases moose numbers," further, "The main cause keeping moose at their present level of abundance is the lack of a major fire to improve the quality of the habitat," adding, "The problem is that there hasn't been a fire of any significant size in 15A for over 40 years. Without the regeneration, moose numbers are at a relatively low density. We know it's definitely because of the habitat."

The plan states that the goal of the wolf control program is to "reduce calf mortality to reverse the long term decline of the bull: cow ratio and increase calf survival." However, ADF&G's plan also clearly recognizes that habitat is limiting the population and includes data presenting poor nutritional condition. Further, the original habitat plan for this program states that bull: cow ratios have been stable since the 1990's (see proposal 174). Reducing calf mortality through control of wolves, in the hopes of improving the bull: cow ratio when neither low bull: cow ratios, nor excessive calf predation, have been identified as limiting factors is scientifically unfounded.

Section 3c of the plan states that, "with limited habitat, reducing predation will allow for possible reallocation of moose from predators to harvest." We question whether such a reallocation is achievable. Further, attempting to reallocate moose from predators to humans would necessitate calves surviving beyond the very young age at which they would be taken by predators. Also, considering that the nutritional stress currently experienced by this population is likely to continue for some time, and that predation in this area is likely compensatory, it is questionable whether such calves would survive to a harvestable age. Further, promoting even a temporary increase in the population is not sustainable under current conditions and could lead to a crash in the moose population.



As recently as March of 2011, ADF&G was promoting a reduction in the moose population objective for 15A. ADF&G staff biologists also indicated during that meeting that they doubted even the lower population objectives could be met. Considering ongoing nutritional stress, we seriously question the rationality of introducing methods meant to increase survival in advance of adequate habitat improvement and in advance of determining if habitat improvement alone would be adequate to allow the moose population to recover. We support development of population objectives which are based on realistically achievable goals.

In section 6c., the plan states that the program will be reviewed and suspended if, after 3 years, any measure consistent with significant levels of nutritional stress [e.g., twinning rates less than 20%, adult female pregnancy rates less than 80%] fails to improve to levels no longer showing significant levels of nutritional stress. While this plan includes habitat improvement, such improvements will take numerous years to achieve. Since nutritional parameters are currently below target, reducing predation and allowing the population to increase could be detrimental to moose and their habitat in this unit.

In addition to ecological concerns, we also have concerns that the program would be ineffective based on land management patterns. The Kenai National Wildlife Refuge, whose primary mission is "to conserve fish and wildlife populations and habitats in their natural diversity," makes up much of Unit 15A. As part of the National Wildlife Refuge system, lands within the Kenai Refuge are subject to federal laws and mandates and are precluded from Alaska's Intensive Management Statute. Aerial wolf control would not be allowed on the Refuge; implementing a program on the remaining lands in 15A would be insufficient to achieve the desired but unsustainable landscape level moose population increase.

This recognition was clearly demonstrated by ADF&G biologist testimony at the March, 2011 BOG meeting, as well as in the 15A FA. The regional ADF&G biologist was again recently quoted in the Homer Tribune stating that, because most of Unit 15A near Kenai is in the wildlife refuge, aerial wolf control is unlikely to have a detectable effect on the estimated 41-45 wolves. Further he stated that, "It's a difficult plan given the limitations of the available land and where the moose population is in respect to the habitat."

Despite the realities of land ownership, the plan states that the predation control area includes all lands within Unit 15A and will be initiated on certain lands pending authorization by land managers/owners. Though authorization may be sought, ADF&G is well aware that any proposal to conduct control on the Kenai Refuge would be subject to NEPA review. We oppose the initiation of such a review. The Unimak Island decision has already clearly demonstrated that the Intensive Management Statute is inconsistent with federal refuge policy. We are therefore confident that aerial control of wolves would ultimately be rejected on Kenai Refuge lands. Initiation of a NEPA review would be an unnecessary waste of taxpayer dollars in a time of fiscal constraint.



In addition to the program being subject to NEPA review on refuge lands, any request to conduct aerial control on 22G lands within the refuge would be subject to a compatibility determination. Intensive management is not compatible with the purposes of the Kenai Refuge, the mission of the National Wildlife Refuge System, nor federal laws and policies which govern refuge management. We would therefore consider the time dedicated to such a review to also be a waste of public tax dollars.

As noted in our March 2011 BOG comments, Defenders is also concerned about the practicality of conducting an aerial wolf control program in 15A. Unit 15A is poorly suited to aerial shooting of wolves due to the forested nature of much of the terrain. Wolves are very difficult to track and shoot in this area and pilots cannot land to retrieve carcasses. Aerial shooting would therefore likely be ineffective in influencing overall wolf numbers in this unit and would result in the waste of a valuable wildlife resource.

Considering that 15A is relatively populated and heavily visited by a variety of recreational users, allowing aerial wolf control would also create a human safety risk and would likely result in increased conflict between user groups. As stated by the regional biologist, "It's likely this will be a highly visible program if it's implemented." The concern over public safety is exacerbated by ADF&G's plan to allow privately permitted citizens to participate in the program. Defenders has long opposed the involvement of private citizens in Alaska's aerial wolf control programs. Allowing private citizens to participate in this program would be especially controversial.

Both the Alaska Constitution and the Intensive Management Statute require the Board of Game to manage wolves on a sustained yield basis. *West v. State, Bd. of Game*, 248 P.3d 689, 696-98 (Alaska 2010). According to the Fish and Wildlife Service, recent and robust wolf population surveys have not been completed in 15A; however, ADF&G's plan states that the wolf population is estimated at 41-45 wolves. Despite the professional difference of opinion with regards to robustness of the available population data, we question the basis for the population target of 15 wolves absent an analysis of the implications for the wolf population.

Considering that the Kenai is relatively isolated from interior populations, we are also concerned that the genetic diversity of these populations will be threatened in the long term; especially considering that the programs – once initiated – do not typically end. Absent an evaluation of the affect wolf control would have on wolf population sustainability in 15A, passage of proposal 35 would violate the BOG's constitutional responsibility to manage wolves on a sustained yield basis.

In addition to the significant concerns addressed above, current conditions in 15A do not meet the predator control implementation criteria of the Intensive Management Statute.

Alaska law requires the Board of Game to:



adopt regulations to provide for intensive management programs to restore the abundance or productivity of identified big game prey populations as necessary to achieve human consumptive use goals of the board in an area where the board has determined that: ... (2) depletion of the big game prey population or reduction of the productivity of the big game prey population has occurred and may result in a significant reduction in the allowable human harvest of the population; and (3) enhancement of abundance or productivity of the big game prey population *is feasibly achievable* utilizing recognized and prudent active management techniques
AS 16.05.255(e)(2), (3) (emphases added).

However, the Board of Game is not to implement intensive management programs where such programs would be "ineffective, based on scientific information" or "inappropriate due to land ownership patterns." AS 16.05.255(f)(1)(A), (B).

Both of these provisions apply here and, therefore, intensive management is not an appropriate solution to declining moose populations in unit 15A. First, proposal 35 is not supported by scientific information. The record is clear that habitat, not predation, is currently limiting moose populations in Unit 15A. The record is also clear that the potential for moose populations to again reach historic levels is unlikely due in part to increasing human settlement on the peninsula. Further, as habitat is currently limiting, increasing the moose population could negatively affect population productivity.

Second, proposal 35 is inappropriate due to land ownership patterns. The land ownership patterns in 15A erode the potential success of aerial wolf control and again preclude such a program from meeting the criteria of the Intensive Management Statute.

Due to constraints of land ownership, the plan could only be implemented on the < 3% of lands in the unit managed by the state. At the March, 2011 meeting ADF&G biologists stated on the record that they did not believe that an aerial wolf control program would feasibly achieve the objective of increasing moose abundance in 15A due to the small scale at which it could be conducted.

The state is well aware of the limitations on conducting this program in an area whose land base is mostly under federal management. Passing a plan that includes refuge lands when it is well known that it cannot be implemented on such lands does not overcome the requirements of the Intensive Management Statute that the program be deemed appropriate under land ownership patterns.

Because current biological circumstances do not warrant predator control, and because the feasibility and potential effectiveness of aerial wolf control are in doubt, an aerial wolf control program cannot be instituted in 15A under the Intensive Management Statute.



Proposal 36 OPPOSE (AWA hereby adopts the comments on this proposal made by Defenders of Wildlife)

This proposal, if adopted, would approve an intensive management plan for moose in 15C.

Again, we have substantial concerns over the fact that the BOG has inhibited public participation by providing ADF&G insufficient time for this plan to be developed thus preventing its inclusion in the November proposal book. The BOG has further hampered participation by considering this proposal in Barrow far from the communities that will be directly affected by the BOG's decision. We have outlined such concerns in past comments to the BOG and consider the continuation of such practices to be detrimental to the public process through which such controversial proposals are adopted. We request, in the very least, that consideration of this plan be moved to the January meeting in Anchorage in order to allow for participation of individuals who will be directly impacted should the proposal pass.

During the March 2011 meeting, the BOG directed the ADF&G to develop an intensive management plan that included aerial wolf control for Unit 15C. The preliminary plan, which included aerial wolf control, was released October 17th, 2011. We vigorously oppose aerial wolf control in this unit. Wolf control is not biologically warranted, appropriate, or feasible in Unit 15C.

Like 15A, implementing aerial wolf control in Unit 15C is not supported by current biological conditions. For this reason, ADF&G recommended "Do Not Adopt" for March meeting proposals 172 and 173 which called for aerial taking of wolves in all of Unit 15 under intensive management. The agency's rationale was that "Unit 15C is currently within intensive management objectives for both population size and harvest."

In addition to recommendations on these proposals, ADF&G's extensive testimony regarding 15C during the March meeting clearly demonstrate the agency's belief that the current low bull: cow ratio in Unit 15C is not the result of predation but of an insufficient harvest strategy which failed to protect an adequate number of young bulls. As a result, the bull: cow ratio has declined. The BOG appropriately responded to this decline by implementing new harvest restrictions. During their testimony, ADF&G indicated that illegal harvest may also be playing a role in the current moose population conditions in the unit.

Despite the fact that overharvest of bulls was implicated as the cause for decline in the bull: cow ratio in prior ADF&G testimony and documents, the recently released plan does not refer to overharvest of bulls as being a factor. Rather, the plan states that the goal of wolf control is to "reduce calf mortality to reverse the long-term decline of the bull: cow ratio." The plan goes on to state that the three major predators in the unit are brown bears, black bears, and wolves; significantly, humans



are missing from the list. We find the omission of the human element to this decline disconcerting considering that all actions by ADF&G and the BOG to date indicate that overharvest of bulls was the primary cause of the decline.

Just as the low bull: cow ratio cannot be traced to wolf predation, evidence has not been presented that productivity and calf survival has been influenced by predation. Unfortunately, during the March meeting, several BOG members continually contended that moose productivity and calf survival have declined in Unit 15C; however, the facts simply do not support these assertions. According to testimony and evidence presented by ADF&G, productivity remains stable in the unit and low calf survival is not implicated as a cause for a decline in the bull: cow ratio.

In addition to factors outlined above, the population of moose is well within population objectives in 15C. In fact, according to the plan, the population increased 40% between 1992 and 2010. Though the moose harvest will be temporarily limited due to new harvest restrictions, clearly the population continues to grow. Considering that the recently initiated harvest strategy is expected to protect a sufficient number of bulls, there is no reason to believe that productivity of this population will decline. Controlling wolf predation to improve productivity is simply not warranted.

The plan indicates that the predation control area includes "all lands within Unit 15C north of Kachemak Bay including the Fox River Flats." As in 15A, a portion of 15C consists of the Kenai National Wildlife Refuge which would be exempt from this program. Though authorization to conduct aerial control may be sought, ADF&G is well aware that any proposal to conduct control on the refuge would be subject to NEPA review. We oppose the initiation of such a review. The Unimak Island decision has already clearly demonstrated that the Intensive Management Statute is inconsistent with federal refuge policy. We are therefore confident that aerial control of wolves would ultimately be rejected on Kenai Refuge lands. Initiation of a NEPA review would be an unnecessary waste of taxpayer dollars in a time of fiscal constraint.

As noted in our comments on proposal 35, Defenders also has concerns over the practicality of conducting an aerial control program in 15C. Unit 15C is poorly suited to aerial wolf control due to the forested nature of much of the terrain. Wolves are very difficult to track and shoot in this area and pilots cannot land to retrieve carcasses. Allowing aerial shooting would therefore likely be ineffective in influencing overall wolf numbers in this unit and result in the waste of a valuable wildlife resource.

Considering that 15C is relatively populated and heavily visited by a variety of recreational users, allowing aerial wolf control would also create a human safety risk and would likely result in increased conflict between user groups. As stated by the regional biologist, "It's likely this will be a highly visible program if it's implemented." The concern over public safety is exacerbated by ADF&G's plan to allow privately permitted citizens to participate in the program. Defenders has long opposed the



involvement of private citizens in Alaska's aerial wolf control programs. Allowing private citizens to participate in this particular program would be especially controversial.

Section 3c. of the plan states that "a reduction of predation can reasonably be expected to aid in continuing to meet the intensive management harvest objectives at a higher level than have previously been achieved through both bull and antlerless harvest." However, the limitations of likely success of the program, given the terrain as well as social factors, throw this opinion into question. Further, the highly productive nature of this moose population does not warrant control of predation to improve moose harvest.

In addition to concerns over the potential for the program to achieve stated goals, we also question the 15C plan's reliance on the operational plan and FA for proposal 35 (see section 7). Both the plan and FA were developed solely for Unit 15A where population concerns are substantially different than those of 15C. Since ADF&G has only recently developed the FA process in order to facilitate proper evaluation of intensive management programs, and considering that ADF&G biologists have been working to complete the FAs since March of this year, we are disappointed that an FA is not yet available for 15C. We are equally concerned that a full independent plan is not yet available.

Both the Alaska Constitution and the Intensive Management Statute require the Board of Game to manage wolves on a sustained yield basis. *West v. State, Bd. of Game*, 248 P.3d 689, 696-98 (Alaska 2010). According to ADF&G, recent and robust wolf population surveys have not been completed in 15C. While we are pleased to see that wolf surveys are being planned, ADF&G indicated during their testimony at the March 2011 BOG meeting that the timeframe imposed for developing the wolf control plan limited their ability to complete a wolf census to include in the plan.

Though a population of 40-75 wolves is estimated to exist in the 15C, this number is based on extrapolation from other areas on the peninsula where the robustness of the data is also in question (see comments on proposal 35). Without robust data on wolf populations in 15C, the BOG will be unable to evaluate the affect wolf control would have on wolf population sustainability. Further, as in our comments on proposal 35, we question the basis for determining a population target of 15 wolves would adequately insure persistence of wolves in the unit. Passage of proposal 36, absent information on how the wolf population will be affected by the planned reduction, would violate the BOG's constitutional responsibility to manage wolves on a sustained yield basis.

The current conditions in 15C do not meet the predator control implementation criteria under the Intensive Management Statute and regulations.

Alaska law requires the Board of Game to:



adopt regulations to provide for intensive management programs to restore the abundance or productivity of identified big game prey populations as necessary to achieve human consumptive use goals of the board in an area where the board has determined that: ... (2) *depletion of the big game prey population or reduction of the productivity of the big game prey population* has occurred and may result in a significant reduction in the allowable human harvest of the population; and (3) enhancement of abundance or productivity of the big game prey population *is feasibly achievable* utilizing recognized and prudent active management techniques. AS 16.05.255(e)(2), (3) (emphases added).

However, the Board of Game is not to implement intensive management programs where such programs would be "ineffective, based on scientific information." AS 16.05.255(f)(1)(A). When implementing the Intensive Management Statute, AS 16.05.255(e) - (g), the Board of Game

"will ... (3) find that depletion of a big game prey population or reduction of the productivity of a big game prey population has occurred when (A) the number of animals, estimated by the department, that can be removed by human harvest from a population, or a portion of a population, on an annual basis without reducing the population below the population objective, preventing growth of the population toward the population objective at a rate set by the board, or altering a composition of the population in a biologically unacceptable manner *is less than the harvest objective for the population; and (B) the population size is less than the population objective for the population...* (5) *not consider as significant...* (B) any reduction in taking that is *intended or expected to be of a short-term and temporary nature* and is necessary for the conservation of the population. 5 AAC 92.106(3)(A)-(5)(B) (emphases added).

Moose population concerns in 15C are not driven by wolf predation but the result of an insufficient harvest strategy which has potentially been exacerbated by illegal harvest. The current low bull: cow ratio has resulted in recent temporary harvest restrictions which are necessary to prevent the continued overharvest of bulls and promote the conservation of the population. The moose population in this region cannot be considered depleted and there is no indication that productivity has declined. Though ADF&G does not believe that productivity has declined, if bulls are not adequately protected, a decline could occur. Because local biologists currently consider productivity and calf survival to be within acceptable levels, and the moose population remains within population objectives, this temporary closure can be expected to improve the bull: cow ratio and conserve a healthy moose population.

The ADF&G and BOG explicitly recognized the temporary nature of this closure during the harvest restriction testimony and subsequent discussion at the March meeting. The BOG further recognized the closure as temporary by adding a sunset clause to the harvest restriction; stating that they would reevaluate population



parameters and reconsider the regulations at the March 2013 meeting. Control of predation would not achieve the desired result of increasing bull recruitment because wolves do not selectively prey on bull moose and problems with calf productivity have not been identified.

Under current circumstances aerial wolf control in Unit 15C is neither warranted biologically nor is it appropriate under the Intensive Management Statute or regulations.

Proposal 37 OPPOSE (AWA hereby adopts the comments on this proposal made by Defenders of Wildlife)

This proposal, if adopted, would reauthorize wolf control to boost calf survival in the Southern Alaska Peninsula Caribou Herd.

According to ADF&G the Southern Alaska Peninsula Caribou Herd (SAPCH) has increased in size since the Unit 9D wolf control program was initiated in 2007; however, sufficient study has not been dedicated to factors other than predation that may be contributing to preliminary indications of increased survival. We continue to have concerns that this program does not meet several recommendations of the National Research Council.

1. The status of the predator population has not been evaluated. The updated SAPCH plan states that no current aerial population survey data are available for the wolf population in the management area. Instead, predator populations are estimated using anecdotal evidence from pilots and local residents. While anecdotal information may be sufficient to supplement aerial surveys during years when surveys are not conducted, they are not adequate on their own in areas where predator control is being conducted.
2. Carrying capacity has not been determined nor sufficient monitoring programs developed. While the revised plan states that nutritional limitations are not implicated as a factor affecting the current status of the SAPCH, the program continues to lack nutritional objectives and fails to outline a protocol for monitoring trends in nutritional condition indices. Further, habitat studies aimed at determining carrying capacity have not been conducted. Defenders has long documented concerns over the potential for habitat degradation to occur in areas where predators have been suppressed. We find it a significant deficiency that the SAPCH program does not incorporate requirements for nutritional status and that population goals are not based on carrying capacity.
3. The programs are not designed as experiments and inadequate data is collected. According to the February 2011 annual report to the BOG, this program utilizes Unimak Island as a control to compare trends in magnitude, abundance and composition. Given that Unimak is an island and island populations perform in a



manner unlike mainland populations, we find that the control is scientifically unacceptable. Defenders supports the more targeted approach being utilized on the Southern Alaska Peninsula, whereby wolves active on calving grounds are taken by management personnel, as opposed to the broad and indiscriminant approach involving privately permitted citizens in other areas. However, we continue to maintain that these programs generally lack adequately developed plans and underlying scientific study.

###



TUSTUMENA SMOKEHOUSEE-Mail: tustumenasmokehouse@alaska.net

49190 Tote Road-Soldotna, AK 99669—Phone: (907)-260-3401-Fax (907)-260-3402

DEAR MR. MC DONOUGH

I Hunt IS B Unit on the KENAI
PENINSULA FOR 20 + YEARS. PLEASE

Think ABOUT Killing WOLFS in THAT
AREA ALSO. THIS YEAR WE WATCHED
16 WOLFS in ONE PACK TAKE DOWN
A COW MOOSE. IT'S NOT A PNEYTY SIGHT.
THE MOOSE AREN'T THERE LIKE THEY
USED TO BE. PLEASE THINK ABOUT
it

SINCERELY
Fred M West
OWNER
TUSTUMENA
SMOKE HOUSE



Alaska Professional Hunters Association Inc.

HC 60 Box 299C Copper Center, Alaska 99573
(907) 822-3755

October 28, 2011

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

Fall 2011 Region V Board of Game Written Comments

Dear Alaska Board of Game Members,

Please find the following comments from the Alaska Professional Hunters Association Inc. (APHA) for your consideration regarding proposals you will be addressing at your Region V meeting in Barrow, Alaska. We have internally hosted several meeting of our member guides that operate within the regions affected by these proposals. Many of them live in these regions and have tremendous hands-on knowledge of the wildlife populations within them.

These same business owners and the professional guide industry represent a significant and important rural economy in Alaska which is dependent upon prudent stewardship of Alaska's wildlife. Additionally, our long history of sharing not only the financial and jobs benefit from these businesses but also just as importantly, the sharing of meat is an important consideration for you.

The professional guide industry often operates in remote regions that are not accessed by local resident hunters. As so, when the meat from the harvest of non-resident hunters is shared within local communities, it most often is harvested from game that these residents would not have opportunity to harvest. Our harvest of Alaska's wildlife resources is directly related to our ability as Alaskan's to provide for our constitutional guidelines of management for abundance, sustained yield and maximum benefit. In this we are dependent upon you.

Thank you for the good work you do for our wildlife and for Alaska.

Please see our following comments on the proposals you have before you.

PROPOSALS THAT APHA OPPOSES: 5, 10, 11, 12, 13, 14, 19, 26, 30

PROPOSALS THAT APHA DEFERS TO THE CONSIDERATION OF THE BOARD WITH COMMENT: 7, 8, 32 and 34.



PROPOSALS THAT APHA SUPPORTS: 15, 23, 24, 25, 29, 35, 36, 37

PROPOSALS THAT APHA SUPPORT WITH AMMENDMENT: 1, 7, 8, 24, 25

Comments per Proposal:

Proposal No. 1: Support with Amendment:

APHA has a significant respect for the management and harvest opportunity of these muskoxen. However, as the conservation for this herd has been a success it would be very helpful to the professional guide in Mekoryuk if the Board would allocate a percentage of these permits to nonresident hunters. If the number of permits is increased to fifty, and the BOG would allocate at least six of those permits to nonresident hunters it would greatly benefit the economy within Mekoryuk. If the BOG would go one step further and allocate three of those nonresident permits to guided and three to unguided it would be a fair balance for the guides and transporters that live and operate out of Mekoryuk.

Nonresident funding has been a significant part of the success of this program and it would be respectful for your consideration on this recommendation. As well, the nonresident hunter is much more likely to share the meat from his harvest with the local residents.

Proposal No. 5: Oppose

We have a number of concerns with this proposal. When the ANS numbers are established on a growing or high density game population it often results in the concern of: "Anything less than the most we ever had will not be enough for a fair allocation to other user groups". We encourage the BOG to wait until this herd stabilizes in population before changing the ANS. As you consider any changes to the existing ANS numbers, we encourage you to explore the existing unreported harvest of moose and caribou which we feel is substantial. Unreported harvest should be included within the ANS determination and not the harvestable surplus after ANS is taken out. Unreported harvest should be considered illegal harvest and no one should receive credit for it.

Another unknown is the numbers of moose and caribou that succumb to exhaustion and lung damage after being run with snow-machines. Death does not always occur immediately but usually several days later. Accountability of harvest is a very important part of any successful or sustainable conservation program. These concerns need to be addressed, and better respect for these resources needs to be developed before ANS numbers are increased. Additionally, other traditional food sources play a big part into the ANS consideration within this region.

Proposals No. 7 and 8: Defer to the consideration of the BOG with the following comments:

We urge special consideration to greatly increasing late season harvest opportunity. Our members who live in this region feel that further expansion of the herd is possible but high winter harvest now may decrease that potential. Unreported harvest and exhaustion mortality remain significant concerns. We would encourage for the best interest of conservation and



education for this region that these hunts be allowed through registration permit to address the unreported harvest factor.

Proposals 10, 11 and 12: Oppose

These proposals lack respect for the resource and bring to point ethical factors that would work against the best interest of all hunters.

Proposals 13 and 14: Oppose

These proposals work against prudent wildlife conservation measures that work for the best interest of the whole. Further, they work against our constitutional mandates for wildlife conservation. They are designed to pit user group against user group in a veiled attempt to restrict conservation based hunting and trapping opportunity.

Proposal 15: Support

We support this proposal for it's given merits.

Proposal 19: Oppose

This proposal works against prudent wildlife conservation measures that work for the best interest of the whole. Further, they work against our constitutional mandates for wildlife conservation. They are designed to pit user group against user group in a veiled attempt to restrict conservation based hunting and trapping opportunity. Much of these lands fall under Federal jurisdiction and nonresident funding has played by far the greatest source of funding for the wildlife conservation measures at work.

Proposal 23: Support

We support this proposal based on its given merits. The problems identified are disrespectful to a great animal and to hunters who respect that animal.

Proposal 24 and 25: Support only with amendments:

Amendments would allow for the whole region to close on June 15th as the ice does not often allow for hunting until late May or early April, and, would eliminate the existing non-resident drawing permit. Neither of these proposed amendments would lend themselves to increased harvest that is not in keeping with conservation based needs.

Proposal 26: Oppose

APHA has a conservation based concern regarding this proposal.

Proposal 29: Support

We support this proposal based on its given merit. The defined problem of underutilization of these permits hurts the guide industry, local economies and meat sharing considerations. As long as the conservation based opportunity exists, we should be doing all we can to fulfill it. If they continue to go unused, our conservation programs are losing important funding.

Proposal 30: Oppose

This proposal works against prudent wildlife conservation measures that work for the best interest of the whole. Further, they work against our constitutional mandates for wildlife



conservation. They are designed to pit user group against user group in a veiled attempt to restrict conservation based hunting and trapping opportunity.

Proposals 32 and 34: Defer to the consideration of the BOG with comment:

We urge the BOG to recognize that Alaska resident hunters pay very little for world-class hunting opportunities. Instead of focusing more effort on asking Alaskans to be respectful enough of their hunting opportunities we are more often making them available for free. We encourage you to work to present to the general hunting public what the conservation costs are to provide management that provides for huntable surpluses and to consider support opportunities for Alaskan to pay for these great privileges.

Proposals 35, 36 and 37: Support

We support these proposals for their given merits.

End of APHA Comments.

Submitted on behalf of the Alaska Professional Hunters Association Inc. by,

Robert Fithian
Executive Director



NATIVE VILLAGE OF GOODNEWS BAY
TRADITIONAL VILLAGE COUNCIL
P.O. BOX 138
GOODNEWS BAY, ALASKA 99589

PHONE NO. 907-967-8929 FAX NO. 967-8330

E-MAIL ADDRESS: goodnews@alaska.net or goodnews@alaska.net

COPY

October 24, 2011

Board of Game
Alaska Dept. of Fish & Game
Board Support Section
P.O. Box 115526

Juneau, Alaska 99811-5526

Attn: Board of Game Comments

RE: Opposition to Proposal #6 – 5 AAC 85.045 Hunting seasons and bag limits for moose.

Dear Board of Game Members,

On behalf of the Community of Goodnews Bay and Platinum we are writing in **opposition** to proposal 6 – 5 AAC 85.045 Hunting seasons and bag limits for moose for **Registration # RM620 which is located in Goodnews Bay River Drainage.**

The author of this proposal wants to eliminate the requirement to pick up a moose registration permits weeks or months prior to the season in remote villages in Region V. and make all registration permits available in season from designated vendors. The issue he pointed out is "Some registration moose permits are only available in the village nearest the hunt two weeks to five months before the hunt opens. This causes much extra cost (around \$1,000 extra from Anchorage) to participate in this hunt for all residents other than those residing in the local village. This is rural priority designed to keep non-local hunters out. Moose are trust property (although introduced to Kodiak) and owned by all Alaskans equally. Most of these hunts will not be greatly utilized by nonlocal hunters but all Alaska residents should have an equal chance to obtain permits. Registration tags in most units surrounding these areas are available throughout the season in local villages. Some of these areas have enough moose to offer five month seasons for any moose to those that can get permits."

There is a reason why Goodnews Bay River Drainage area has this registration permit system in place and to the communities of Goodnews Bay and Platinum it is vitally important.



Back in 2003-2004, these two communities sat down with U.S. Fish & Wildlife Service from Togiak National Wildlife Refuge and explored ways to increase the moose population in Goodnews River Drainage area, after much discussion, they came up with the agreement that the residents both in Goodnews Bay and Platinum would stop hunting for at least five (5) years and/or once the population reaches over 100 moose on the annual count conducted by Togiak National Wildlife Refuge officials we would be able to start hunting. The residents sacrificed their hunting seasons and much needed diet supplement which has been traditionally consumed, in hope that the moose population in this area would increase for present and future generations. For years the area residents abided to the agreement, then in 2008, after the annual aerial count they counted about 113, in which we introduced a proposal to you Board of Game to open Goodnews River Drainage for moose hunt, which was granted for that fall but with a quota of 10 moose, at least 10% of the moose population, this quota of 10 moose was used until this year in which we asked the Department of Fish and Game to raise the quota to 20 moose since 10 moose was not enough for both the communities of Goodnews Bay and Platinum and it also let us compete amongst ourselves to try to get a moose before the quota was taken and that is not our tradition. As you are also aware the price of gas and oil are two to three times higher than you pay in a city and this put a tremendous strain on the hunters to put food on the table for the winter and before the quota is taken.

For someone from the outside of our communities, like the author of this proposal to complain about extra cost to fly in from Anchorage (\$1,000) to participate in the hunt in this area just so he can hopefully get a trophy size game is something we cannot support when we have to endure all the hardships to get all our subsistence needs. Why would a hunter from Anchorage area come to our area to hunt while in South Central area there are over thousands of moose roaming around and they occasionally walks in downtown streets, what is a wrong and what is a difference between those moose in South Central area and the moose in our area. A moose is a moose and we don't see a moose as "trust property" any animal including moose does not belong to the State and/or Federal or any individual until it is caught to be consumed to supplement the subsistence need and as of now, while we try to increase the population of moose in our area we do not have surplus and enough moose to offer five months season for any moose to those that can get permits as pointed out by the author of this proposal.

If he or anybody else in Anchorage or other areas doesn't want to spend extra dollars then we strongly recommend that they hunt in South Central or other areas where there is more moose to hunt and let us try to increase the number of moose in our area.

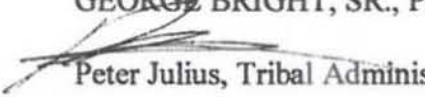
We adamantly oppose this proposal, Proposal #6 – 5ACC 85-045 Hunting Season and bag limits for moose, pertaining to **Registration #RM620, located in Goodnews River Drainage**, we urge you, the Board of Game not to accept this proposal and do away with Registration Permit system in Goodnews Drainage area and please keep the distribution of permits in local area as is.

Quyana for your time.

Sincerely,
NATIVE VILLAGE OF GOODNEWS BAY



Sincerely,
NATIVE VILLAGE OF GOODNEWS BAY
GEORGE BRIGHT, SR., PRESIDENT

Peter Julius, Tribal Administrator

CC: files

CC: continued

Advisory Committee- Bethel

ADF&G – Bethel

TNWR – Dillingham

AVCP – Bethel



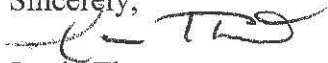
ATTN: Board of Game Comments
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
FAX: (907) 465-6094

Board of Game:

As a resident of Seward, I extremely confused as to why the meeting to discuss Proposals 35 and 36 (Predator control) is to be held in Barrow and that these proposals are not currently available to the public. I strongly urge you to postpone this discussion and reschedule this to take place on the Kenai Peninsula. The Kenai Peninsula Borough citizens on both sides of this issue deserve the chance to attend this meeting, learn about the issue and participate in the discussion.

I personally have reservations about using our Alaskan tax dollars to remove a relatively small number of predators. This method of wildlife management is not very cost effective and a rather short-term solution. I would be interested in hearing more about all of the possible wildlife management strategies that are be considered by the ADFG biologists and which method is most likely to result in the most economically efficient increase in the moose population.

Sincerely,



Jamie Thomton
PO Box 3486
Seward, AK 99664
907-491-0253



October 25,



Dear Board of Game

I like bears and wulfs. Wulfs
and Deqns need to eat. It is
not fair to bait or kill
them. Plz don't.

From: Os can pet en sed

10/25/11

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

Attention Board of Directors,

I am writing in regards to the proposal for aerial wolf hunting on the Kenai Peninsula (Unit 15A and 15C). The proposal numbers 35 and 36 are in direct opposition to my views on wildlife management in populated areas. I have been living on the peninsula for 11 years, and am an outdoor enthusiast and biologist. I can honestly say that I have never seen a wolf on the peninsula. If the wolf population were seriously impacting our wildlife populations, then we should be seeing signs of wolf activity on a regular basis. If the wolf population is high for the amount of area that can support them, then consider increasing the bag limit for trappers first.

I understand that with the population base in this region there are many of us who are interested in harvesting a moose for subsistence. The reality is that although this land provides well for us, many of us will not be able to annually harvest moose. Please do not allow aerial wolf hunting and consider some other options for moose population enhancement.

I highly encourage sensitive habitat restoration projects for riparian zones and wildlife corridors, and enhancing forests for moose browse (such as selective thinning of dense spruce forests in wildlife corridors and encouraging alder, birch or mountain ash). I do not think that the ratio of predator to prey is the problem in these units, but rather the availability of food due to human activity, forest age and habitat degradation.

The practice of aerial hunting in such a popular tourist destination may also reflect badly on our image to visitors who support the economy. It could have lasting effects on the local economy that is already seeing signs of decline since the recession.

Thank you for taking the time to consider my opposing opinion to proposal 35 and 36 for aerial wolf hunting on the Kenai Peninsula.



Jen Kain
Seward, AK



Oct 25 Tues 61

PC8
1 of 1



Dear Bd of Game,

At your meeting it was stated that because of lack of food the moose were suffering. Have you asked DOT to stop killing off moose browse on the Hwy to Miniduk off of Kachemak Dr. or any other heavily destroyed (unnecessarily) area.

How will killing wolves bring back the hundreds killed on our highways?

The Bd of Game, although they seem to think they are smarter than God, are really just a bunch of hunter happy lost souls. How sad that they can kill anything in any number just because they want it their way.

I have gone to your dictatorial meetings and felt as though you would easily shoot to kill me if you had the chance and believe me my 93 yr old friend with me was a friend of you for weeks. She kept bawling out the doors at night.

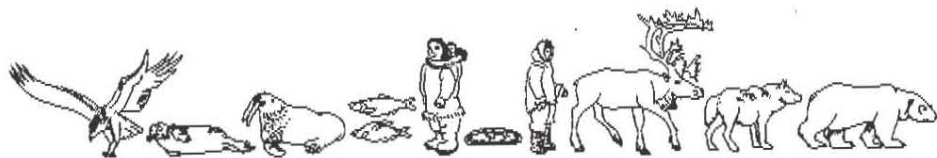
You were NOT there to listen to us or hear us but we are aware of this now and no longer will attend since you made it quite clear that our voices are unheard.

Less interference from BoG will bring back all populations of game to this state. If more families have less children and we allow less hunting from out-of-state people we would have more Fish + Game.

Sincerely,

A handwritten signature in dark ink, appearing to be "Kara".

Still Scared - Love Kara Penn.



KAWERAK, INC. • P.O. Box 948 • Nome, AK 99762



TEL: (907) 443-5231 • FAX: (907) 443-4452



SERVING THE
VILLAGES OF:
BREVIG MISSION
COUNCIL
DIOMEDE
ELIM
GAMBELL
GOLOVIN
KING ISLAND
KOYUK
MARY'S IGLOO
NOME
SAVOONGA
SHAKTOOLIK
SHISHMAREF
SOLOMON
STEBBINS
ST. MICHAEL
TELLER
UNALAKLEET
WALES
WHITE MOUNTAIN

October 19, 2011

ATTN: Board of Game Comments
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 225526
Juneau, AK 99811-5526
Fax: 907-465-6094

Dear Board of Game:

Please accept these comments from Kawerak, Inc., a non-profit tribal consortium, based in the Norton Sound/Bering Strait region of Northwest Alaska. These comments are regarding three proposals to be addressed by the board in November:

Proposal 24: Align brown bear seasons in Unit 22C with remainder of Unit

Proposal 25: Align brown bears seasons in Unit 22

Proposal 26: Open a year round season for brown bear in Unit 22.

Kawerak's constituents are residents of small communities on the Seward Peninsula and the islands of St. Lawrence and Diomed. Residents reside in GMU 22 and part of 23.

The Seward Peninsula contains approximately 15 million acres of mostly wild country with 15 tiny communities scattered throughout. Most of the population in the region is Alaska Native, who by choice and economy live a traditional subsistence lifestyle. They depend on natural resources harvested from the country and ocean, to live. People hunt marine mammals, large game, small game such as birds and gather bird eggs, greens, roots, berries. These resources have been the mainstay of livelihood in the region and they are preferred foods. Our constituents cannot afford to buy red meat (ranch raised beef) at \$9/lb or fish (local halibut or shipped in salmon) at \$14/lb.

We take this opportunity to express our position in regards to the seasons for brown bears in GMU 22. We want to see the season for brown bear harvest as liberal as possible. People in the area are generally concerned about the number of bears and want to be able to harvest bear year round, without seasonal limitation, or permit requirements.

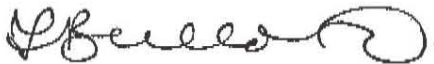
Each year our constituents bring up the increasing number of bears surrounding their communities during Kawerak's annual regional conference, Kawerak board meetings, at advisory committee meetings and regional advisory council meetings. They express the frustration of reoccurring destruction of property (cabins, tent frames, reindeer, meat hanging racks), loss of harvests (red meat



and fish hanging on drying racks), fear of freely roaming through traditional places our fathers and their fathers traveled in pursuit of fish, game, birds, eggs, greens, berries, roots, drift wood for fuel and building material. They express the distasteful and unreasonable DLP requirement to submit, at great expense, the required animal parts to the department.

The fact that bear sows are raising triplet cubs proves our region has a healthy, bountiful habitat for wild game and bears. We have a right to go on the land to harvest foods without fear of brown bears. A liberal hunting season is more advantageous to local hunters, who can then take the opportunity to harvest brown bears during the time they are out also harvesting wild foods. Please take our views into consideration as you determine the hunting season for brown bears in 22C.

Sincerely,
KAWERAK, INC.



Loretta Bullard, President

CC: Representative Foster
Representative Joule
Senator Olson





TEL: (907) 443-5231 • FAX: (907) 443-4452

SERVING THE
VILLAGES OF:
BRÉVIG MISSION
COUNCIL
DIOMEDE
ELIM
GAMBELL
GOLOVIN
KING ISLAND
KOYUK
MARY'S IGLOO
NOME
SAVOONGA
SHAKTOOLIK
SHISHMAREF
SOLOMON
STEBBINS
ST. MICHAEL
TELLER
UNALAKLEET
WALES
WHITE MOUNTAIN

October 24, 2011

ATTN: Board of Game Comments
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 225526
Juneau, AK 99811-5526
Fax: 907-465-6094

Dear Board of Game:

Enclosed is a copy of a letter from the Shishmaref Elders Advisory Committee addressed to the Kawerak Elders Advisory Committee (KEAC), a Kawerak board committee.

The KEAC reviewed the letter and asked the Kawerak Natural Resources Committee to review and recommend action. The Kawerak Natural Resources Committee passed a motion directing staff to send the enclosed letter to you and express they agree with the views of the Shishmaref Elders Advisory Committee.

The Shishmaref Elders Advisory Committee is expressing that their community is being pressured by the increased population of musk ox and brown bears in the region.

When the BOG discusses Proposals 23, 24, 25 and 26 during your upcoming board meeting in Barrow please take the enclosed views into consideration.

Sincerely,
KAWERAK, INC.

Loretta Bullard for LB

Loretta Bullard, President





Native Village of Shishmaref
Shishmaref I.R.A. Council
PO Box 72110
Shishmaref, Alaska 99772
Ph: (907) 649-3821/2082
Fax: (907) 649-2104
Email: irageneral@gci.net

Shishmaref Elders
Advisory Committee

Sept. 16, 2011

Kawerak Elder Advisory,

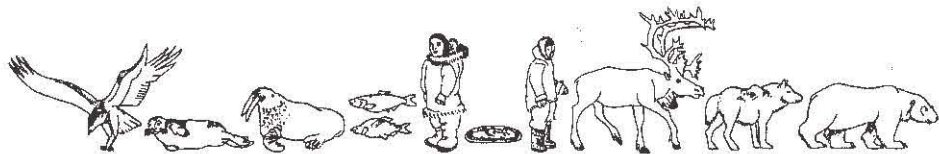
The Elder's Committee held a Meeting on September 15, 2011 and some comments and concerns were mentioned.

There are too many brown bears and musk ox around the camping grounds, and the musk ox are ruining alot of the berry picking areas. The Elders would like to request to have the cemetery extended and protected and would like to have the roads covered up, which are too close to the cemetery. A suggestion to improve a road to the lagoon, of which is too soft and muddy for the 4-wheelers to drive through the ground as it is at this time.

Sincerely,

Davis Sockpick, Chairman





KAWERAK, INC. • P.O. Box 948 • Nome, AK 99762



TEL: (907) 443-5231 • FAX: (907) 443-4452



SERVING THE
VILLAGES OF:
BREVIG MISSION
COUNCIL
DIOMEDE
ELIM
GAMBELL
GOLOVIN
KING ISLAND
KOYUK
MARY'S IGLOO
NOME
SAVOONGA
SHAKTOOLIK
SHISHIMAREF
SOLOMON
STEBBINS
ST. MICHAEL
TELLER
UNALAKLEET
WALES
WHITE MOUNTAIN

October 26, 2011

ATTN: Board of Game Comments
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 225526
Juneau, AK 99811-5526
Fax: 907-465-6094

Dear Board of Game:

Please accept these comments from Kawerak Reindeer Herders Association (RHA), a membership organization of reindeer herd owners in the Norton Sound/Bering Strait region of Northwest Alaska regarding Proposal 23 Musk Ox.

We understand the Board of Game reviewed a proposal, number 223 at their March 2011 in which they reviewed the department's discretionary authority to destroy the trophy value of animals taken under a subsistence hunt, in various GMUs including musk ox in Unit 22 and 23. The department staff provided Record Copy 96 which provided factual background of management of musk ox and offered alternatives ranging from no change to drastic changes to subsistence musk ox hunting on the Seward Peninsula.

ADFG staff Tony Gorn notified Kawerak Natural Resources that the potential regulation change brought forth by the BOG (Proposal 23) consists of the following:

1. The BOG is considering a change that would create two (2) Seward Peninsula muskox populations: 1) a population of mature bulls (bulls that are 4 years old and older), and 2) a second population consisting of all the other animals in the muskox population (all cows, and bulls 3 years old and younger).
2. The intent of the mature bull population is to provide hunting opportunity of mature bull muskox under the drawing hunt system. Mature bulls would only be available for harvest to hunters with a drawing permit and a \$500 resident Alaska tag.
3. The subsistence muskox population would consist of all the other animals in the muskox population (all cows, and bulls 3 years old and younger) and would be available for harvest to hunters possessing a Tier I or Tier II permit, with no fee to the hunter. However, subsistence hunters with a Tier I or Tier II permit would be prohibited from harvesting a mature bull muskox.
4. Trophy destruction of horns that has been in place since hunting began under the State system would no longer be used on the Seward Peninsula. There would be no further destruction of muskox horns under the State system of hunting.

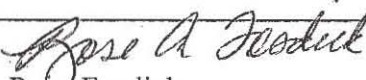


Department staff have repeatedly expressed to reindeer herders who are subsistence hunters that they should allow the population to grow and that a subsistence harvest would be allowed. Subsistence hunting is a priority for both the federal and state management system for allocation of harvestable wildlife and fish. Subsistence hunters on the Seward Peninsula harvest mature bulls (4 years and older). Any changes to the Amount Necessary for Subsistence (ANS) for local populations of wildlife should be fully discussed per Statute and then proposed, considered and approved by the Board of Game.

Kawerak Reindeer Herders Association opposes changes to muskox hunting opportunities for subsistence hunters on the Seward Peninsula and recommends the musk ox hunting regulations for Seward Peninsula GMU 22 and 23 remain status quo.

The RHA members are owners of reindeer herds and reside in small communities on the Seward Peninsula and the St. Lawrence Island. The herd owners obtain range use permits to graze reindeer on public and private land. They are Alaska Native, who by choice live a reindeer herding lifestyle and also depend on traditional subsistence resources. Herd owners harvest red meat from their reindeer herds for family use and for income. They harvest velvet and use the income to purchase items needed for reindeer herding and to have access to subsistence resources. They depend on their herds and the natural resources they harvest which include marine mammals, big and small game, bird eggs, greens, roots, berries.

Sincerely,
KAWERAK, INC.



Rose Fosdick
Vice President, Natural Resources Division
Program Director, Reindeer Herders Association





KAWERAK, INC. • P.O. Box 948 • Nome, AK 99762



TEL: (907) 443-5231 • FAX: (907) 443-4452



SERVING THE
VILLAGES OF:
BREVIG MISSION
COUNCIL
DIOMEDE
ELIM
GAMBELL
GOLOVIN
KING ISLAND
KOYUK
MARY'S IGLOO
NOME
SAVOONGA
SHAKTOOLIK
SHISHMAREF
SOLOMON
STEBBINS
ST. MICHAEL
TELLER
UNALAKLEET
WALES
WHITE MOUNTAIN

October 26, 2011

ATTN: Board of Game Comments
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 225526
Juneau, AK 99811-5526
Fax: 907-465-6094

Dear Board of Game:

Please accept these comments from Kawerak Reindeer Herders Association (RHA), a membership organization of reindeer herd owners in the Norton Sound/Bering Strait region of Northwest Alaska.

These comments are regarding three proposals to be addressed by the board in November:

Proposal 24: Align brown bear seasons in Unit 22C with remainder of Unit

Proposal 25: Align brown bears seasons in Unit 22

Proposal 26: Open a year round season for brown bear in Unit 22.

The RHA members are owners of reindeer herds and reside in small communities on the Seward Peninsula and the St. Lawrence Island. The herd owners obtain range use permits to graze reindeer on public and private land. They are Alaska Native, who by choice live a reindeer herding lifestyle and also depend on traditional subsistence resources. Herd owners harvest red meat from their reindeer herds for family use and for income. They harvest velvet and use the income to purchase items needed for reindeer herding and to have access to subsistence resources. They depend on their herds and the natural resources they harvest which include marine mammals, game, bird eggs, greens, roots, berries.

Each year during their annual meeting reindeer herders bring up the increasing number of bears causing destruction of private property. They speak of bears killing reindeer and destroying cabins and meat hanging racks. They are frustrated at the loss of potential and future income from reindeer products. They speak of the distasteful and unreasonable DLP requirements to submit the required animal parts to the department at great expense.

The Seward Peninsula contains prime habitat for ungulates and those animals attract bears and other predators. Caribou migrate onto the peninsula in the fall/winter and out in the spring however predators remain and reindeer are prime candidates for bears.



The herd owners have a right to make a living from their reindeer herds and they believe liberalizing the season for bear hunting will be beneficial as reindeer fawning starts in mid April.

The RHA recommends the season for brown bear for GMU 22C be opened on April 15 and closed May 31 and that the fall season be retained. Please take their views into consideration as you determine the season for brown bears in 22C.

Sincerely,
KAWERAK, INC.



Rose Fosdick
Vice President, Natural Resources Division
Program Director, Reindeer Herders Association



October 28, 2011

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

To Whom It May Concern:

Thank you for the opportunity to submit these written comments on Proposal 35 (Proposal) that would approve an intensive management plan for moose in 15A and 15C and will be considered at the November 11-14, 2011 Board of Game (BOG) meeting in Barrow, Alaska. I am a resident of Homer, Alaska and testified in opposition to the proposals at the Homer Fish and Game Advisory Committee Meeting held in Homer on October 25th. My oppositions to the proposal includes the following reasons:

I. The Proposal Violates Public Notice and Comment Procedures.

I have substantial concerns over the fact that the BOG has inhibited public participation by providing the public insufficient time to review the plan. Specifically, the Proposal was not made available to the public until it was published on the Alaska Department of Fish and Game web-site on October 17, 2011. This is a violation of the Public Notice Comment requirement under the Alaska Administrative Procedures Act which provides:

- (a) At least 30 days before the adoption, amendment, or repeal of a regulation, notice of the proposed action shall be;
 - (1) published in the newspaper of general circulation or trade or industry publication that the state agency prescribes and posted on the Alaska Online Public Notice System; ~~in the discretion of the state agency giving~~ the notice, the requirement of publication in a newspaper or trade or industry publication may be satisfied by using a combination of publication and broadcasting; when broadcasting the notice, an agency may use an abbreviated form of the notice if the broadcast provides the name and date of the newspaper or trade or industry journal and the Internet address of the Alaska Online Public Notice System where the full text of the notice can be found;
 - (2) furnished to every person who has filed a request for notice of proposed action with the state agency...

AS 44.62.190.

Therefore, based on the fact that the Proposal was not published until



October in preparation and the Board will be considering the Proposal sometime during the November 11-14th meeting and none of the other conditions of AS 44.62.190(a)(1)&(2) have, apparently, been complied with, the Board is prohibited from making any decision on the Proposal at the November Board meeting. In addition, in the Alaska Department of Fish and Game's (ADF&G') rush to complete the Proposal, the proposal has been insufficiently developed and was not even included in the ADF&G's November proposal book. This prevented the BOG, Advisory Committees and the general public from being able to review the Proposal in a sufficient amount of time and has contributed to a substantial amount of confusion relating to understanding the scientific basis for the Proposal. The BOG has, further, prevented me and other interested members of the public from participating in the November meeting by holding the discussion and decision on the Proposal in Barrow far from the communities that will be directly affected.

The failure of the BOG to acknowledge the need for public participation in such a controversial proposal is detrimental to the public process and a violation of state law. I, therefore, request, at the very least, that consideration of the Proposals be moved to the January meeting in Anchorage in order to allow for my participation and that of individuals who will be directly impacted by the Proposals.

II. Wolf control is not biologically warranted, appropriate, or feasible in Units 15A or 15C.

Rather than wolf predation, biologists recognize that habitat is limiting moose population growth in both 15A. The Proposal, itself, states "declining habitat quality is the main limiting factor affecting low moose densities in Unit 15(A); there has not been a fire of significant size in the unit for over 40 years." Further, ADF&G recognized that the current moose population objectives for 15A were too high as illustrated by a proposal recommending the moose population objectives be lowered was submitted by ADF&G for the March BOG meeting. ~~Despite extensive biological evidence that such a reduction~~ was necessary, the BOG rejected the proposed reduction in objectives. Due to the widely recognized habitat limitations in 15A, ADF&G also stated that "if predator densities were reduced to increase moose numbers without concomitant wide-spread improvements to the habitat any increases to moose survival would further increase the nutritional stress of the moose population thereby reducing productivity."

That habitat, rather than predation, however, is limiting moose population growth in 15A is illustrated by ADF&G, itself, which provides, in the Proposal that habitat is limiting the population as illustrated by data presenting poor nutritional condition. Further, the original habitat plan for this program states that bull: cow ratios have been stable since the 1990's (see proposal 174). Reducing calf mortality through control of wolves, in the hopes of improving the bull: cow ratio when neither low bull: cow ratios, nor excessive calf predation, have been identified as limiting factors is scientifically unfounded.

Similarly, as in the case of 15A, implementing aerial wolf control in Unit 15C is not supported by current biological conditions. For this reason, ADF&G recommended "Do Not Adopt" for March meeting proposals 172 and 173 which called for aerial taking of wolves in all of Unit 15 under intensive management. The agency's rationale was that "Unit 15C is currently within intensive management objectives for both population size and harvest."

Not only is there insufficient scientific basis for the Proposal, but there is a substantial question as to whether it will even work at all. The Proposal, itself, provides that "reducing predation will allow for *possible* reallocation of moose from predators to harvest..." Similarly, the only thing that remotely resembles a scientific bases for the Proposal is "the *potential effectiveness* of aerial wolf control." This means that the Proposal is not even remotely based in science and is almost entirely based in politics.

The Proposal is further flawed by it's complete failure to study the impacts of reducing wolf numbers on the wolf population itself. This is particularly true since the Proposal will be largely ineffective in increasing moose populations until habitat conditions improve and will have to be repeated in future years to have any measurable impact on such populations at all, let alone to reach the BOG's objectives.

Finally, the Proposal fails to address the likely further decline of habitat necessary to produce healthy moose populations if wolf populations are reduced in 15A and 15C. This is based on numerous studies illustrating that wolves are key species in the health of ecosystems and, therefore, populations of moose and other ungulates. Wolves are a keystone predator, and as such, is an integral component of healthy functioning ecosystems. The admission on the one hand of the ADF&G, itself, that habitat is the major factor that is limiting moose populations but, completely, failing to even mention maintaining the healthy numbers of wolves in 15A and 15C as a means of addressing such habitat issues on the other, illustrates the complete lack of sound science upon which the Proposal is based.

Conclusion

The fact that the ADF&G, itself, expressly admits that habitat degradation due to lack of fire and other factors, is the primary cause of Moose populations that are not meeting the BOG's arbitrary levels of for Moose population objectives and ADF&G's statement that controlling wolves has a mere "possibility" of increasing moose populations, illustrates that the Proposal is highly unlikely to meet BOG objectives. Further, the fact that it will likely require multiple control applications which will result in the removal of a keystone species that is necessary to improve moose habitat conditions, means that the Proposal will, actually, negatively impact both moose and wolf populations over the long term. This proposal is best illustrated by the words of one ADF&G representative at the Homer Advisory Committee meeting who said, "the BOG directed ADG&G to increase moose populations as quickly as possible" which illustrates that this proposal has nothing to do with science and everything to do with politics.

Please contact me if you have any questions regarding these comments.

Sincerely,



Hal Shepherd
P.O. Box 15332
Fritz Creek, AK 99603
(907)299-8821

cc: Commissioner of Fish and Game
Mead Treadwell, Lieutenant Governor of Alaska





National Headquarters

1130 17th Street, N.W. | Washington, D.C. 20036-4604 | tel 202.682.9400 | fax 202.682.1331
www.defenders.org

October 25, 2011

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

Dear Alaska Department of Fish and Game:

Please find attached 89 comments from Defenders of Wildlife supporters urging the Board of Game to reject proposals 35 and 36. Enclosed are the personalized letters from residents of Alaska who are strongly opposed to these proposals that would unnecessarily allow for wolves to be killed on the Kenai Peninsula.

Please consider these comments as part of your decision making process and accept our thanks for ensuring that the voices of these concerned citizens are heard. If you have any questions about the letters, please contact Chris Stergalas at 202-772-0256 or cstergalas@defenders.org.

Sincerely,

Chris Stergalas
Online Campaigns Associate
Defenders of Wildlife



Miss Kimberly McConkey
2610 E 42nd Ave
Apt 1
Anchorage, AK 99508-5396
(907) 569-5466

Oct 21, 2011

Defenders Petitions

Subject: I oppose Proposals 35 and 36

Dear Defenders Petitions,

As an Alaska Resident I am very concerned about proposals 35 and 36. Any proposal that impacts our wildlife must use the best available science to back it up, and proposals 35 and 36 do not.

If passed, these proposals would allow aerial gunning by private citizens in 15A and 15C.

These proposals cite the need to reduce wolf populations because of a recent decline in moose populations on the Kenai Peninsula. Even though the Department of Fish and Game presented biological evidence at the March Board of Game meeting that showed predation was not the cause of moose population declines.

If wolves are not the cause of moose declines, then there is no reason to kill them. At the March meeting, the Board of Game and state biologists concluded that bulls were over harvested in 15C and harvest needed to be temporarily reduced.

In 15A, most of which is comprised of the Kenai National Wildlife Refuge, poor moose habitat has caused declines -- not wolves. Wolf control could make this problem even worse.

Further, the Kenai Peninsula is a popular attraction for tourism and recreation. The area is relatively populated and aerial gunning would be highly visible and could impact tourism in the area.

Any proposal that the Board of Game considers should be discussed in the area that will be affected. Considering the issue at the next meeting in Barrow suppresses public participation, since it is in an isolated area and difficult and expensive to travel to. At the very least the discussion should take place at the January meeting in Anchorage.

Proposals 35 and 36 are bad ideas and I strongly urge you to reject them.

Sincerely,
Miss Kimberly McConkey



Ms. Cheryl Sennett
PO Box 243493
Anchorage, AK 99524-3493
(907) 000-0000

Oct 21, 2011

Defenders Petitions

Subject: I oppose Proposals 35 and 36

Dear Defenders Petitions,

As an Alaska Resident I am very concerned about proposals 35 and 36. Any proposal that impacts our wildlife must use the best available science to back it up, and proposals 35 and 36 do not.

If passed, these proposals would allow aerial gunning by private citizens in 15A and 15C.

These proposals cite the need to reduce wolf populations because of a recent decline in moose populations on the Kenai Peninsula. Even though the Department of Fish and Game presented biological evidence at the March Board of Game meeting that showed predation was not the cause of moose population declines.

If wolves are not the cause of moose declines, then there is no reason to kill them. At the March meeting, the Board of Game and state biologists concluded that bulls were over harvested in 15C and harvest needed to be temporarily reduced.

In 15A, most of which is comprised of the Kenai National Wildlife Refuge, poor moose habitat has caused declines -- not wolves. Wolf control could make this problem even worse.

Further, the Kenai Peninsula is a popular attraction for tourism and recreation. The area is relatively populated and aerial gunning would be highly visible and could impact tourism in the area.

Any proposal that the Board of Game considers should be discussed in the area that will be affected. Considering the issue at the next meeting in Barrow suppresses public participation, since it is in an isolated area and difficult and expensive to travel to. At the very least the discussion should take place at the January meeting in Anchorage.

Proposals 35 and 36 are bad ideas and I strongly urge you to reject them.

Sincerely,
Ms. Cheryl Sennett



Mrs. Patricia Mayhan
PO Box 2387
Homer, AK 99603-2387
(907) 235-2959

Oct 23, 2011

Defenders Petitions

Subject: I oppose Proposals 35 and 36

Dear Defenders Petitions,

As a Kenai Peninsula Resident I am very concerned about proposals 35 and 36. Any proposal that impacts our wildlife must use the best available science to back it up, and proposals 35 and 36 do not. These proposals are in direct conflict with the studies and data collected by the ADF&G resident biologists in the areas of Units 15A and 15C.

State of Ak. highway signs on Alaska's Kenai Peninsula state there were 252 moose killed on the highways July 1, 2010 to July 1 2011 . Pretty amazing since there are only about 260 miles of state highway on the peninsula.

A 1995 Report by the Ak. Dept. of Transportation addressed the issues of moose/ vehicle accidents on Ak. rural roads and their objectives were to identify areas of high moose/ vehicle collisions and increase mitigation efforts and look for other possible solutions.

I have lived in Homer for 21 yrs. and have seen some of these solutions enacted by state DOT but my question is if the number of moose/vehicle collisions is high on the Kenai Peninsula what more can be done?

I own property outside of Homer since 1989. Every year I reported illegal moose hunting to the state Troopers and no one was ever charged. The last moose killed illegally on my property was a baby moose calf shot in the neck in the summer, which I did report and it was investigated and that was it. I built my house in 2002 and that stopped the annual poaching of moose on my property.

There is no doubt there is a need for more law enforcement of state game laws.

The moose population issues are not new. Increases in human populations and activities, a major highway that divides moose habitat, an annual high rate of moose/ vehicle collisions, habitat loss leading to decreases in food supplies and hunting illegally or out of season should be addressed before killing non invasive species to Alaska, the wolf.

Sincerely,
Patricia L Mayhan
Box 2387
Homer, Ak. 99603

Sincerely,
Mrs. Patricia Mayhan



Mrs. Stan Stephens
PO Box 1272
Valdez, AK 99686-1272
(907) 835-2700

Oct 23, 2011

Defenders Petitions

Subject: I oppose Proposals 35 and 36

Dear Defenders Petitions,

Since I live here, I was appalled to hear of the newly begun attack on wolves. I don't see any reason except that there are not enough moose for big men to hunt. Too bad. We can send our men to the grocery store, wolves have to do what wolves do - which is to help with the balance of natural species numbers, not with science but on their own. Please read the following and act according to the wishes of many Alaskans who are not in favor of ariel hunting.

As an Alaska Resident I am very concerned about proposals 35 and 36. Any proposal that impacts our wildlife must use the best available science to back it up, and proposals 35 and 36 do not.

If passed, these proposals would allow aerial gunning by private citizens in 15A and 15C.

These proposals cite the need to reduce wolf populations because of a recent decline in moose populations on the Kenai Peninsula. Even though the Department of Fish and Game presented biological evidence at the March Board of Game meeting that showed predation was not the cause of moose population declines.

If wolves are not the cause of moose declines, then there is no reason to kill them. At the March meeting, the Board of Game and state biologists concluded that bulls were over harvested in 15C and harvest needed-to-be-temporarily-reduced.

In 15A, most of which is comprised of the Kenai National Wildlife Refuge, poor moose habitat has caused declines -- not wolves. Wolf control could make this problem even worse.

Further, the Kenai Peninsula is a popular attraction for tourism and recreation . The area is relatively populated and aerial gunning would be highly visible and could impact tourism in the area.

Any proposal that the Board of Game considers should be discussed in the area that will be affected. Considering the issue at the next meeting in Barrow suppresses public participation, since it is in an isolated area and difficult and expensive to travel to. At the very least the discussion should take place at the January meeting in Anchorage.

Proposals 35 and 36 are bad ideas and I strongly urge you to reject them.



Sincerely,
Mrs. Stan Stephens



Ms. Theresa Bush
2397 E 47th Ct
Anchorage, AK 99507-1028
(907) 222-1382

Oct 22, 2011

Defenders Petitions

Subject: I oppose Proposals 35 and 36

Dear Defenders Petitions,

I am discusted with our position as supposed supporters of us portraying our state as "the last frontier". Why are you thinking killing wolves would gain hunting or commercial potential clients as a positive marketing or financial incentive? I have had many visitors come up here to hike and only hope to see a wolf. This proposal is nothing less than barbaric. How do you tuck your children in at night knowing of all this unneccessary bloodshed is going on and you advocate for this? Why don't you show them pictures of what you stand for? As an Alaska Resident I am very concerned about proposals 35 and 36. Any proposal that impacts our wildlife must use the best available science to back it up, and proposals 35 and 36 do not.

If passed, these proposals would allow aerial gunning by private citizens in 15A and 15C. I will to my best ability avert these actions and inforcement.

These proposals cite the need to reduce wolf populations because of a recent decline in moose populations on the Kenai Peninsula. Even though the Department of Fish and Game presented biological evidence at the March Board of Game meeting that showed predation was not the cause of moose population declines.

If wolves are not the cause of moose declines, then there is no reason to kill them. At the March meeting, the Board of Game and state biologists ~~concluded that bulls were over-harvested in 15C and harvest~~ needed to be temporarily reduced.

In 15A, most of which is comprised of the Kenai National Wildlife Refuge, poor moose habitat has caused declines -- not wolves. Wolf control could make this problem even worse.

Further, the Kenai Peninsula is a popular attraction for tourism and recreation . The area is relatively populated and aerial gunning would be highly visible and could impact tourism in the area.

Any proposal that the Board of Game considers should be discussed in the area that will be affected. Considering the issue at the next meeting in Barrow suppresses public participation, since it is in an isolated area and difficult and expensive to travel to. At the very least the discussion should take place at the January meeting in Anchorage.

Proposals 35 and 36 are bad ideas and I strongly urge you to reject



them.

Sincerely,
Ms. Theresa Bush



Ms. Carol Gebauer
2100 Minerva Way Unit A6
Anchorage, AK 99515-1420
(907) 245-0211

Oct 22, 2011

Defenders Petitions

Subject: I oppose Proposals 35 and 36

Dear Defenders Petitions,

Mark Begich are you really in support of this?

Giving private citizens firearms that allow them to shoot wolves from the air is the most unbelievable proposition I have yet to hear since living in Alaska since 1993; you must be kidding me!

As an Alaska Resident I am very concerned about proposals 35 and 36. Any proposal that impacts our wildlife must use the best available science to back it up, and proposals 35 and 36 do not.

If passed, these proposals would allow aerial gunning by private citizens in 15A and 15C.

These proposals cite the need to reduce wolf populations because of a recent decline in moose populations on the Kenai Peninsula. Even though the Department of Fish and Game presented biological evidence at the March Board of Game meeting that showed predation was not the cause of moose population declines.

If wolves are not the cause of moose declines, then there is no reason to kill them. At the March meeting, the Board of Game and state biologists concluded that bulls were over harvested in 15C and harvest needed to be temporarily reduced.

~~In 15A, most of which is comprised of the Kenai National Wildlife~~
Refuge, poor moose habitat has caused declines -- not wolves. Wolf control could make this problem even worse.

Further, the Kenai Peninsula is a popular attraction for tourism and recreation. The area is relatively populated and aerial gunning would be highly visible and could impact tourism in the area.

Any proposal that the Board of Game considers should be discussed in the area that will be affected. Considering the issue at the next meeting in Barrow suppresses public participation, since it is in an isolated area and difficult and expensive to travel to. At the very least the discussion should take place at the January meeting in Anchorage. Why would this issue be discussed in Barrow where Anchorage residents have NO reasonable means in which to travel & attend? I think the answer is obvious.

Proposals 35 and 36 are bad ideas and I strongly urge you to reject them.



Sincerely,
Ms. Carol Gebauer



Dr. Conley Marcum
7463 White Hawk Dr
Anchorage, AK 99507-4808
(907) 317-8174

Oct 22, 2011

Defenders Petitions

Subject: I support Proposals 35 and 36

Dear Defenders Petitions,

Wildlife management using predator control is proven and sometimes necessary.

Please consider supporting this action.

Sincerely,

Conley Marcum

Sincerely,
Dr. Conley Marcum



Ms. Judith Guertin
2610 Klamath Dr
Anchorage, AK 99517-3257

Oct 22, 2011

Defenders Petitions

Subject: I oppose Proposals 35 and 36

Dear Defenders Petitions,

As an Alaska Resident I am very concerned about proposals 35 and 36. Any proposal that impacts our wildlife must use the best available science to back it up, and proposals 35 and 36 do not.

If passed, these proposals would allow aerial gunning by private citizens in 15A and 15C. Not only is this wrong, but it gives the wrong impression about Alaska. A bunch of gun toting fools who are out shooting anything and everything dressed like combat mercenaries! Having worked for Fish and Game under Ron Skoog as commissioner, I witnessed firsthand the lack of understanding and compassion when it came to the Game Division. Guns, load and kill was their mantra. Guess it still is. Therefore, try to be less antiquated and get into the 21st century. We do not want our wolves killed! And you and Parnell do not, I repeat, do not, speak for me!

These proposals cite the need to reduce wolf populations because of a recent decline in moose populations on the Kenai Peninsula. Even though the Department of Fish and Game presented biological evidence at the March Board of Game meeting that showed predation was not the cause of moose population declines.

If wolves are not the cause of moose declines, then there is no reason to kill them. At the March meeting, the Board of Game and state biologists concluded that bulls were over harvested in 15C and harvest ~~needed-to-be-temporarily-reduced.~~

In 15A, most of which is comprised of the Kenai National Wildlife Refuge, poor moose habitat has caused declines -- not wolves. Wolf control could make this problem even worse.

Further, the Kenai Peninsula is a popular attraction for tourism and recreation. The area is relatively populated and aerial gunning would be highly visible and could impact tourism in the area.

Any proposal that the Board of Game considers should be discussed in the area that will be affected. Considering the issue at the next meeting in Barrow suppresses public participation, since it is in an isolated area and difficult and expensive to travel to. At the very least the discussion should take place at the January meeting in Anchorage.

Proposals 35 and 36 are bad ideas and I strongly urge you to reject them.



Sincerely,
Ms. Judith Guertin



Ms. Jane Webber
5137 Sillary Cir
Anchorage, AK 99508-4942

Oct 22, 2011

Defenders Petitions

Subject: I oppose Proposals 35 and 36

Dear Defenders Petitions,

As an Alaska Resident I am very concerned about proposals 35 and 36. Any proposal that impacts our wildlife must use the best available science to back it up, and proposals 35 and 36 do not.

If passed, these proposals would allow aerial gunning by private citizens in 15A and 15C.

These proposals cite the need to reduce wolf populations because of a recent decline in moose populations on the Kenai Peninsula. Even though the Department of Fish and Game presented biological evidence at the March Board of Game meeting that showed predation was not the cause of moose population declines.

If wolves are not the cause of moose declines, then there is no reason to kill them. At the March meeting, the Board of Game and state biologists concluded that bulls were over harvested in 15C and harvest needed to be temporarily reduced.

In 15A, most of which is comprised of the Kenai National Wildlife Refuge, poor moose habitat has caused declines -- not wolves. Wolf control could make this problem even worse.

Further, the Kenai Peninsula is a popular attraction for tourism and recreation. The area is relatively populated and aerial gunning would be highly visible and could impact tourism in the area.

Any proposal that the Board of Game considers should be discussed in the area that will be affected. Considering the issue at the next meeting in Barrow suppresses public participation, since it is in an isolated area and difficult and expensive to travel to. At the very least the discussion should take place at the January meeting in Anchorage.

Proposals 35 and 36 are bad ideas and I strongly urge you to reject them.

Nothing I have read or seen would indicate a need to ambush wolves from the air. It would appear that someone is generating hysteria to support a personal agenda, and that is reprehensible.

Sincerely,
Ms. Jane Webber



Ms. juliet.stoudenmire
PO Box 230625
Anchorage, AK 99523-0625

Oct 21, 2011

Defenders Petitions

Subject: I oppose Proposals 35 and 36

Dear Defenders Petitions,

As an Alaska Resident I am very concerned about proposals 35 and 36. Any proposal that impacts our wildlife must use the best available science to back it up, and proposals 35 and 36 do not.

If passed, these proposals would allow aerial gunning by private citizens in 15A and 15C.

These proposals cite the need to reduce wolf populations because of a recent decline in moose populations on the Kenai Peninsula. Even though the Department of Fish and Game presented biological evidence at the March Board of Game meeting that showed predation was not the cause of moose population declines.

If wolves are not the cause of moose declines, then there is no reason to kill them. At the March meeting, the Board of Game and state biologists concluded that bulls were over harvested in 15C and harvest needed to be temporarily reduced.

In 15A, most of which is comprised of the Kenai National Wildlife Refuge, poor moose habitat has caused declines -- not wolves. Wolf control could make this problem even worse.

Further, the Kenai Peninsula is a popular attraction for tourism and recreation. The area is relatively populated and aerial gunning would be highly visible and could impact tourism in the area.

Any proposal that the Board of Game considers should be discussed in the area that will be affected. Considering the issue at the next meeting in Barrow suppresses public participation, since it is in an isolated area and difficult and expensive to travel to. At the very least the discussion should take place at the January meeting in Anchorage.

Proposals 35 and 36 are bad ideas and I strongly urge you to reject them.

I agree with everything written above and email firmly against any aerial wolf hunting. It is wrong!

Sincerely,
Ms. juliet stoudenmire



Ms. Ileana Dumitrescu
12, Baciului St.
Bucharest, AK 99566

Oct 21, 2011

Defenders Petitions

Subject: I oppose Proposals 35 and 36

Dear Defenders Petitions,

As an Alaska Resident I am very concerned about proposals 35 and 36. Any proposal that impacts our wildlife must use the best available science to back it up, and proposals 35 and 36 do not.

If passed, these proposals would allow aerial gunning by private citizens in 15A and 15C.

These proposals cite the need to reduce wolf populations because of a recent decline in moose populations on the Kenai Peninsula. Even though the Department of Fish and Game presented biological evidence at the March Board of Game meeting that showed predation was not the cause of moose population declines.

If wolves are not the cause of moose declines, then there is no reason to kill them. At the March meeting, the Board of Game and state biologists concluded that bulls were over harvested in 15C and harvest needed to be temporarily reduced.

In 15A, most of which is comprised of the Kenai National Wildlife Refuge, poor moose habitat has caused declines -- not wolves. Wolf control could make this problem even worse.

Further, the Kenai Peninsula is a popular attraction for tourism and recreation. The area is relatively populated and aerial gunning would be highly visible and could impact tourism in the area.

Any proposal that the Board of Game considers should be discussed in the area that will be affected. Considering the issue at the next meeting in Barrow suppresses public participation, since it is in an isolated area and difficult and expensive to travel to. At the very least the discussion should take place at the January meeting in Anchorage.

Proposals 35 and 36 are bad ideas and I strongly urge you to reject them.

Moreover, wolf hunting seems to have become some cheap political point meant to gain votes from eco-blind people who fail to understand the importance of wolves for keeping wild animals' health and vigour. Trying to obscure the REAL causes of moose population decline will NOT solve the problem!

Sincerely,



Ms. Ileana Dumitrescu



Ms. Annie Dunham
8901 Peck Ave
Apt 102n
Anchorage, AK 99504-1495
(907) 337-5758

Oct 21, 2011

Defenders Petitions

Subject: I oppose Proposals 35 and 36

Dear Defenders Petitions,

As an Alaska Resident I am very concerned about proposals 35 and 36. Any proposal that impacts our wildlife must use the best available science to back it up, and proposals 35 and 36 do not.

If passed, these proposals would allow aerial gunning by private citizens in 15A and 15C.

These proposals cite the need to reduce wolf populations because of a recent decline in moose populations on the Kenai Peninsula. Even though the Department of Fish and Game presented biological evidence at the March Board of Game meeting that showed predation was not the cause of moose population declines.

If wolves are not the cause of moose declines, then there is no reason to kill them. At the March meeting, the Board of Game and state biologists concluded that bulls were over harvested in 15C and harvest needed to be temporarily reduced.

In 15A, most of which is comprised of the Kenai National Wildlife Refuge, poor moose habitat has caused declines -- not wolves. Wolf control could make this problem even worse.

Further, the Kenai Peninsula is a popular attraction for tourism and recreation. The area is relatively populated and aerial gunning would be highly visible and could impact tourism in the area.

Any proposal that the Board of Game considers should be discussed in the area that will be affected. Considering the issue at the next meeting in Barrow suppresses public participation, since it is in an isolated area and difficult and expensive to travel to. At the very least the discussion should take place at the January meeting in Anchorage.

Proposals 35 and 36 are bad ideas and I strongly urge you to reject them.

PLEASE STOP KILLING ANIMALS THAT BELONG HERE and were here BEFORE humans. It is sinful and NOT necessary.

Sincerely,
Ms. Annie Dunham



Ms. April Warwick
5716 Kennyhill Dr
Anchorage, AK 99504-3724
(907) 338-7777

Oct 21, 2011

Defenders Petitions

Subject: I oppose Proposals 35 and 36

Dear Defenders Petitions,

As an Alaska Resident I am very upset about proposals 35 and 36. Any proposal that impacts our wildlife must use the best available science to back it up, and proposals 35 and 36 DO NOT.

If passed, these proposals would allow aerial gunning by private citizens in 15A and 15C.

These proposals cite the need to reduce wolf populations because of a recent decline in moose populations on the Kenai Peninsula. Even though the Department of Fish and Game presented biological evidence at the March Board of Game meeting that showed predation was not the cause of moose population declines.

If wolves are not the cause of moose declines, then there is NO reason to kill them. At the March meeting, the Board of Game and state biologists concluded that bulls were over harvested in 15C and harvest needed to be temporarily reduced.

In 15A, most of which is comprised of the Kenai National Wildlife Refuge, poor moose habitat has caused declines -- not wolves. Wolf control could make this problem even worse.

Proposals 35 and 36 are BAD ideas and I strongly urge you to REJECT them.

Sincerely,
Ms. April Warwick



Mr. Brian Bailey
36915 Hakala Rd
Soldotna, AK 99669-6804

Oct 24, 2011

Defenders Petitions

Subject: I oppose Proposals 35 and 36

Dear Defenders Petitions,

As an Alaska Resident of 35 years I am very concerned about proposals 35 and 36. Any proposal that impacts our wildlife must use the best available science to back it up, and proposals 35 and 36 do not.

If passed, these proposals would allow aerial gunning by private citizens in 15A and 15C.

These proposals cite the need to reduce wolf populations because of a recent decline in moose populations on the Kenai Peninsula. Even though the Department of Fish and Game presented biological evidence at the March Board of Game meeting that showed predation was not the cause of moose population declines.

If wolves are not the cause of moose declines, then there is no reason to kill them. At the March meeting, the Board of Game and state biologists concluded that bulls were over harvested in 15C and harvest needed to be temporarily reduced.

In 15A, most of which is comprised of the Kenai National Wildlife Refuge, poor moose habitat has caused declines -- not wolves. Wolf control could make this problem even worse.

Further, the Kenai Peninsula is a popular attraction for tourism and recreation. The area is relatively populated and aerial gunning would be highly visible and could impact tourism in the area. Many AK residents and visitors to the state look upon animals such as wolves and bears as being true symbols of Alaska wilderness, not as victims of aerial predator control designed to appease a percentage of moose hunters. Residents and visitors come to Alaska with the HOPE of seeing wolves or bears, not hearing about them being killed for no readily apparent reason.

Any proposal that the Board of Game considers should be discussed in the area that will be affected. Considering the issue at the next meeting in Barrow suppresses public participation, since it is in an isolated area and difficult and expensive to travel to. At the very least the discussion should take place at the January meeting in Anchorage.

If the Board of Game truly wants moose numbers to rise on the Kenai, then habitat management is the best solution. Prescribed burn management could create a significant amount of moose habitat that would have a positive influence of the moose population. Aerial wolf



hunting is not a solution, it just creates more upheaval and uproar from thousands of people in Alaska and the rest of the country who wonder what decision-making processes go into Board of Game proposals.

Focus on habitat management and please don't go down this slippery road of predator control on the Kenai Peninsula..
Proposals 35 and 36 are bad ideas and I strongly urge you to reject them.

Sincerely,
Mr. Brian Bailey



Ms. Andrea Enciso
8440 Berry Patch Dr
Anchorage, AK 99502-7264

Oct 24, 2011

Defenders Petitions

Subject: I oppose Proposals 35 and 36

Dear Defenders Petitions,

Please do not allow these beautiful creatures to be killed. They are a part of what is left of our world's wildlife. They mean no harm against people or other animals. They are hunting for food just as any other wild animal was born to do to survive. Let nature take its course, instead of letting (certain) human beings try to alter the ways of nature. I ask of you to think twice before allowing these beautiful creatures to be gunned down.

As an Alaska Resident I am very concerned about proposals 35 and 36. Any proposal that impacts our wildlife must use the best available science to back it up, and proposals 35 and 36 do not.

If passed, these proposals would allow aerial gunning by private citizens in 15A and 15C.

These proposals cite the need to reduce wolf populations because of a recent decline in moose populations on the Kenai Peninsula. Even though the Department of Fish and Game presented biological evidence at the March Board of Game meeting that showed predation was not the cause of moose population declines.

If wolves are not the cause of moose declines, then there is no reason to kill them. At the March meeting, the Board of Game and state biologists concluded that bulls were over harvested in 15C and harvest needed to be temporarily reduced.

In 15A, most of which is comprised of the Kenai National Wildlife Refuge, poor moose habitat has caused declines -- not wolves. Wolf control could make this problem even worse.

Further, the Kenai Peninsula is a popular attraction for tourism and recreation. The area is relatively populated and aerial gunning would be highly visible and could impact tourism in the area.

Any proposal that the Board of Game considers should be discussed in the area that will be affected. Considering the issue at the next meeting in Barrow suppresses public participation, since it is in an isolated area and difficult and expensive to travel to. At the very least the discussion should take place at the January meeting in Anchorage.

Proposals 35 and 36 are bad ideas and I strongly urge you to reject them.



Sincerely,
Ms. Andrea Enciso



Mr. Jack Swihart
1601a E 41st Ct
Anchorage, AK 99508-5107

Oct 24, 2011

Defenders Petitions

Subject: I oppose Proposals 35 and 36

Dear Defenders Petitions,

I Strongly urge our lawmakers to reject these two (2) proposals. The studies conducted suggest that poor habitat and not predators are the reason for the low moose population. As an Alaska Resident and a lover of all wildlife I strongly oppose these measures.

As an Alaska Resident I am very concerned about proposals 35 and 36. Any proposal that impacts our wildlife must use the best available science to back it up, and proposals 35 and 36 do not.

If passed, these proposals would allow aerial gunning by private citizens in 15A and 15C.

These proposals cite the need to reduce wolf populations because of a recent decline in moose populations on the Kenai Peninsula. Even though the Department of Fish and Game presented biological evidence at the March Board of Game meeting that showed predation was not the cause of moose population declines.

If wolves are not the cause of moose declines, then there is no reason to kill them. At the March meeting, the Board of Game and state biologists concluded that bulls were over harvested in 15C and harvest needed to be temporarily reduced.

In 15A, most of which is comprised of the Kenai National Wildlife Refuge, poor moose habitat has caused declines -- not wolves. Wolf control could make this problem even worse.

Further, the Kenai Peninsula is a popular attraction for tourism and recreation. The area is relatively populated and aerial gunning would be highly visible and could impact tourism in the area.

Any proposal that the Board of Game considers should be discussed in the area that will be affected. Considering the issue at the next meeting in Barrow suppresses public participation, since it is in an isolated area and difficult and expensive to travel to. At the very least the discussion should take place at the January meeting in Anchorage.

Proposals 35 and 36 are bad ideas and I strongly urge you to reject them.

Sincerely,
Mr. Jack Swihart



Miss Iris Magana
364 6th St Apt A
Jber, AK 99505-1207

Oct 21, 2011

Defenders Petitions

Subject: I oppose Proposals 35 and 36

Dear Defenders Petitions,

As an Alaskan resident and military wife that is concerned not only for our environment but our futures I ask you to please reconsider Proposals 35 and 36. It seems that the recent evidence brought to light by the department of fish and game presents no more threat from the wolves towards the moose population than any other creature. In fact, it seems that one of the true causes of the low population is us over-hunting the bulls. With very few safe habitats left in the world for wolves, and Alaska now considering un-sporting extermination methods, we need to think about the future we are handing over to our children where the majestic wolf is no longer endangered but completely and totally extinct. Yes, wolves have been around for centuries, but when humans decided to step into the picture, their numbers started to viciously dwindle. We need to remember that in nature, wolves and moose keep themselves in check without much problem, it's us with our helicopters and our traps that are throwing off the balance of both creatures. Please, for all of us, reconsider alternative options to/or some severe revising of proposals 35 and 36.

Thank you very much.

Sincerely,
Miss Iris Magana



Ms. Jeanne Schaaf
6961 Rabbit Creek Rd
Anchorage, AK 99516-3738
(907) 345-6071

Oct 21, 2011

Defenders Petitions

Subject: I oppose Proposals 35 and 36

Dear Defenders Petitions,

The idea of aerial gunning by anyone with the means to do so is pretty frightening to a person who hikes and runs in the backcountry. Are you guys serious? I am an Alaska Resident I don't like proposals 35 and 36.

If passed, these proposals would allow aerial gunning by private citizens in 15A and 15C.

These proposals cite the need to reduce wolf populations because of a recent decline in moose populations on the Kenai Peninsula. Even though the Department of Fish and Game presented biological evidence at the March Board of Game meeting that showed predation was not the cause of moose population declines.

If wolves are not the cause of moose declines, then there is no reason to kill them. At the March meeting, the Board of Game and state biologists concluded that bulls were over harvested in 15C and harvest needed to be temporarily reduced.

In 15A, most of which is comprised of the Kenai National Wildlife Refuge, poor moose habitat has caused declines -- not wolves. Wolf control could make this problem even worse.

Further, the Kenai Peninsula is a popular attraction for tourism and recreation. ~~The area is relatively populated and aerial gunning would~~ be highly visible and could impact tourism in the area.

Any proposal that the Board of Game considers should be discussed in the area that will be affected. Considering the issue at the next meeting in Barrow suppresses public participation, since it is in an isolated area and difficult and expensive to travel to. At the very least the discussion should take place at the January meeting in Anchorage.

Proposals 35 and 36 are bad ideas and I strongly urge you to reject them.

Sincerely,
Ms. Jeanne Schaaf



Ms. Mckinlee O'Donnell
7539 Eastbrook Cir
Anchorage, AK 99504-3569
(907) 332-0438

Oct 21, 2011

Defenders Petitions

Subject: I oppose Proposals 35 and 36

Dear Defenders Petitions,

As an Alaska Resident I am very concerned about proposals 35 and 36. Any proposal that impacts our wildlife must use the best available science to back it up, and proposals 35 and 36 do not.

If passed, these proposals would allow aerial gunning by private citizens in 15A and 15C.

These proposals cite the need to reduce wolf populations because of a recent decline in moose populations on the Kenai Peninsula. Even though the Department of Fish and Game presented biological evidence at the March Board of Game meeting that showed predation was not the cause of moose population declines.

If wolves are not the cause of moose declines, then there is no reason to kill them. At the March meeting, the Board of Game and state biologists concluded that bulls were over harvested in 15C and harvest needed to be temporarily reduced.

In 15A, most of which is comprised of the Kenai National Wildlife Refuge, poor moose habitat has caused declines -- not wolves. Wolf control could make this problem even worse.

Further, the Kenai Peninsula is a popular attraction for tourism and recreation . The area is relatively populated and aerial gunning would be highly visible and could impact tourism in the area.

Any proposal that the Board of Game considers should be discussed in the area that will be affected. Considering the issue at the next meeting in Barrow suppresses public participation, since it is in an isolated area and difficult and expensive to travel to. At the very least the discussion should take place at the January meeting in Anchorage.

Proposals 35 and 36 are bad ideas and I strongly urge you to reject them.

Sincerely,
Ms. Mckinlee O'Donnell



Alaska Office
333 West 4th Avenue, #302 | Anchorage, AK 99501 | tel 907.276.9453 | fax 907.276.9454
www.defenders.org

October 19, 2011

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

To Whom It May Concern:

Defenders of Wildlife, The Alaska Center for the Environment and The Alaska Wildlife Alliance appreciate the opportunity to submit these written comments on proposals that will be considered at the November 11-14, 2011 Board of Game (BOG) meeting in Barrow, Alaska.

Established in 1947, Defenders of Wildlife (Defenders) is a non-profit membership based organization dedicated to the protection of all native wild animals and plants in their natural communities. Defenders focuses 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 address conservation issues affecting wolves, black bears, brown bears, wolverines, Cook Inlet beluga whales, sea otters, polar bears, Pacific walrus and impacts to wildlife from climate change. Our Alaska program seeks to increase recognition of the importance of, and need for the protection of, entire ecosystems and interconnected habitats while recognizing the role that predators play as indicator species for ecosystem health. Defenders represents more than 3,000 members and supporters in Alaska and more than one million nationwide.

COMMENTS ON ALASKA BOARD OF GAME PROPOSALS

Proposal 15. We offer the following comments on this proposal.

This proposal aims to increase the bag limit for wolves in Unit 18 from 5 to 10 wolves.



Defenders supports regulations that adhere to sound wildlife management principles and are consistent with maintaining healthy populations of all species as well as healthy ecosystems. We urge the ADF&G to analyze and report what effect this proposal would have on the local wolf population in order to insure that its passage would not result in the overharvest of wolves in this area.

Proposal 16. We offer the following comments on this proposal.

Passage of this proposal would increase the bag limit for wolverine in Unit 18 from 1 to 2.

Defenders supports regulations that adhere to sound wildlife management principles and are thus consistent with maintaining healthy populations of all species as well as healthy ecosystems. We urge the ADF&G to analyze and report what effect this proposal would have on the local wolverine population in order to insure that its passage would not result in the overharvest of wolverines in this area.

Proposal 17. We offer the following comments on this proposal.

This proposal seeks to extend the season and increase the bag limit for lynx in Unit 18.

Defenders supports regulations that adhere to sound wildlife management principles and are consistent with maintaining healthy populations of all species as well as healthy ecosystems. We urge the ADF&G to analyze and report what effect this proposal would have on the local lynx population in order to insure that its passage would not result in the overharvest of lynx in this area.

~~Proposal 24. We oppose this proposal and urge the BOG to reject it.~~

This proposal, if passed, would align brown bear seasons in Unit 22C with the remainder of the unit. The proponents of this proposal claim that the bear population is underutilized, there is bear predation on local ungulates and reindeer, and bear and human conflict exists.

While allowing increased opportunity to harvest bears where opportunity exists may be acceptable, data must be provided which demonstrates that increased harvest will not negatively affect the sustainability of the population. We do not consider increasing the take of brown bears to be a solution to addressing the primary concerns outlined in this proposal.

While we agree with the proponents that brown bears predate upon ungulates, there is no evidence that bear predation is having an excessive influence on the

caribou or moose populations in this unit. According to ADF&G's 2007 Moose Management Report the moose population in 22C exceeds objectives and an antlerless hunt was implemented in 2000 to stabilize the population. Further, this unit falls within the range of the Western Arctic Caribou herd which remains at high levels.

In addition, while brown bears may occasionally take domestic reindeer it is likely that only a few bears can be implicated; we do not view altering the season to allow for increased and non-targeted take of brown bears as solution to this problem. Husbandry tools have been successfully developed to decrease risk of depredation on livestock in the lower 48. Rather than increasing brown bear harvest to address this issue, efforts should be made to determine if such tools might be adapted to prevent depredation of domesticated animals in Alaska.

Finally, while some brown bears may break in to cabins, it is unlikely that all of the unit's brown bears are actually responsible for such break-ins. Therefore, targeting all brown bears in the region with increased hunting is unwarranted. Further, residents already have the ability to take a bear in Defense of Life and Property.

While residents have the right to protect their property from being raided by bears, residents are also responsible for adequately protecting their homes and properties in order to prevent conflicts with wildlife. Emphasis should be placed on preventing negative interactions rather than attempting to solve conflicts by increasing the take of brown bears.

ADF&G recently held workshops on bear-proofing subsistence cabins. Additional workshops should be held in rural locations as an effective means of providing residents with additional tools to prevent future conflict.

Proposal 26. We *oppose* this proposal and urge the BOG to reject it.

This proposal, if passed, would open a year round season for brown bear in Unit 22. The proponent of this proposal claims that brown bears are causing excessive damage by breaking into cabins and subsistence caches. The goal of the proposal is to prevent this type of damage from occurring.

While brown bears may be implicated in cabin break-ins, it is unlikely that all of the unit's brown bears are actually responsible. Therefore, targeting all brown bears in the region is unwarranted. Further, residents already have the ability to take a bear in Defense of Life and Property.

As stated in comments on proposal 24, while rural subsistence users have the right to protect their property from being raided by bears, all Alaska residents also hold

the responsibility of adequately protecting their homes and properties in order to prevent conflicts with wildlife. Emphasis should be placed on preventing the types of interactions described in this proposal rather than attempting to solve conflict by increasing the take of brown bears.

ADF&G recently held workshops on bear-proofing subsistence cabins. Additional workshops should be held in rural locations as an effective means of providing residents with the tools to prevent the type of conflict outlined in this proposal.

Proposal 30. We support this proposal and urge the BOG to adopt it.

If passed, this proposal would establish a harvest objective for brown bear in the Noatak National Preserve.

The proponent of this proposal claims that there is a localized unsustainable harvest rate for brown bears in certain portions of Noatak National Preserve and provides evidence to support this claim. Defenders supports efforts aimed at preventing overharvest and ensuring the continued viability of wildlife populations.

Proposal 33. We offer the following comments on this proposal.

The proposal aims to open the wolverine hunting season earlier in Unit 26.

Defenders supports regulations that adhere to sound wildlife management principles and are consistent with maintaining healthy populations of all species as well as healthy ecosystems. We urge the ADF&G to analyze and report what effect this proposal would have on the local wolverine population in order to insure that its passage would not result in the overharvest of wolverines.

Proposal 35. We oppose this proposal and urge the BOG to reject it.

This proposal, if adopted, would approve an intensive management plan for moose in 15A.

Firstly, we have substantial concerns over the fact that the BOG has inhibited public participation by providing ADF&G insufficient time for this plan to be developed thus preventing its inclusion in the November proposal book. The BOG has further hampered participation by considering this proposal in Barrow far from the communities that will be directly affected by the BOG's decision. We have outlined such concerns in past comments to the BOG and consider the continuation of such practices to be detrimental to the public process through which such controversial proposals are adopted. We request, in the very least, that consideration of this plan be moved to the January meeting in Anchorage in order

to allow for participation of individuals who will be directly impacted should the proposal pass.

During the March 2011 meeting, the BOG directed the ADF&G to develop an intensive management plan that included aerial wolf control for 15A. The preliminary plan was released October 17th, 2011 and included aerial control of wolves. We vigorously oppose aerial wolf control in Unit 15A. Wolf control is not biologically warranted, appropriate, or feasible in Unit 15A.

At the March meeting, ADF&G supplied a Feasibility Assessment (FA) for intensive management in 15A (see attached Record Copy 23 and Proposal 174). Though the FA was conducted with the goal of describing the feasibility of a habitat based intensive management plan, it also addressed the limitations of conducting a predator control program in 15A.

In the FA, ADF&G biologists recognized that habitat was limiting moose population growth in 15A. Further, ADF&G recognized that the current moose population objectives for 15A were too high. A proposal recommending the moose population objectives be lowered was submitted by ADF&G for the March meeting and, despite extensive biological evidence that such a reduction was necessary, was rejected by the BOG. Due to the widely recognized habitat limitations in 15A, ADF&G also stated in their FA that "if predator densities were reduced to increase moose numbers without concomitant wide-spread improvements to the habitat any increases to moose survival would further increase the nutritional stress of the moose population thereby reducing productivity."

The recognition that habitat, rather than predation, is limiting moose population growth in 15A is also demonstrated by recent media coverage of this issue. The regional ADF&G biologist who was responsible for drafting the plan stated "The reason we had conducted the survey [in 15A] was due to the chronic decline in moose numbers, which was predicted by the department based on changes in habitat. Fifteen A has a rich history in wildfires that changes the habitat. This greatly benefits moose browse and increases moose numbers," further, "The main cause keeping moose at their present level of abundance is the lack of a major fire to improve the quality of the habitat," adding, "The problem is that there hasn't been a fire of any significant size in 15A for over 40 years. Without the regeneration, moose numbers are at a relatively low density. We know it's definitely because of the habitat."

The plan states that the goal of the wolf control program is to "reduce calf mortality to reverse the long term decline of the bull: cow ratio and increase calf survival." However, ADF&G's plan also clearly recognizes that habitat is limiting the population and includes data presenting poor nutritional condition. Further,

the original habitat plan for this program states that bull: cow ratios have been stable since the 1990's (see proposal 174). Reducing calf mortality through control of wolves, in the hopes of improving the bull: cow ratio when neither low bull: cow ratios, nor excessive calf predation, have been identified as limiting factors is scientifically unfounded.

Section 3c of the plan states that, "with limited habitat, reducing predation will allow for possible reallocation of moose from predators to harvest." We question whether such a reallocation is achievable. Further, attempting to reallocate moose from predators to humans would necessitate calves surviving beyond the very young age at which they would be taken by predators. Also, considering that the nutritional stress currently experienced by this population is likely to continue for some time, and that predation in this area is likely compensatory, it is questionable whether such calves would survive to a harvestable age. Further, promoting even a temporary increase in the population is not sustainable under current conditions and could lead to a crash in the moose population.

As recently as March of 2011, ADF&G was promoting a reduction in the moose population objective for 15A. ADF&G staff biologists also indicated during that meeting that they doubted even the lower population objectives could be met. Considering ongoing nutritional stress, we seriously question the rationality of introducing methods meant to increase survival in advance of adequate habitat improvement and in advance of determining if habitat improvement alone would be adequate to allow the moose population to recover. We support development of population objectives which are based on realistically achievable goals.

In section 6c., the plan states that the program will be reviewed and suspended if, after 3 years, any measure consistent with significant levels of nutritional stress [e.g., twinning rates less than 20%, adult female pregnancy rates less than 80%] fails to improve to levels no longer showing significant levels of nutritional stress.

While this plan includes habitat improvement, such improvements will take numerous years to achieve. Since nutritional parameters are currently below target, reducing predation and allowing the population to increase could be detrimental to moose and their habitat in this unit.

In addition to ecological concerns, we also have concerns that the program would be ineffective based on land management patterns. The Kenai National Wildlife Refuge, whose primary mission is "to conserve fish and wildlife populations and habitats in their natural diversity," makes up much of Unit 15A. As part of the National Wildlife Refuge system, lands within the Kenai Refuge are subject to federal laws and mandates and are precluded from Alaska's Intensive Management Statute. Aerial wolf control would not be allowed on the Refuge; implementing a program on the remaining lands in 15A would be insufficient to achieve the desired but unsustainable landscape level moose population increase.

This recognition was clearly demonstrated by ADF&G biologist testimony at the March, 2011 BOG meeting, as well as in the 15A FA. The regional ADF&G biologist was again recently quoted in the Homer Tribune stating that, because most of Unit 15A near Kenai is in the wildlife refuge, aerial wolf control is unlikely to have a detectable effect on the estimated 41-45 wolves. Further he stated that, "It's a difficult plan given the limitations of the available land and where the moose population is in respect to the habitat."

Despite the realities of land ownership, the plan states that the predation control area includes all lands within Unit 15A and will be initiated on certain lands pending authorization by land managers/owners. Though authorization may be sought, ADF&G is well aware that any proposal to conduct control on the Kenai Refuge would be subject to NEPA review. We oppose the initiation of such a review. The Unimak Island decision has already clearly demonstrated that the Intensive Management Statute is inconsistent with federal refuge policy. We are therefore confident that aerial control of wolves would ultimately be rejected on Kenai Refuge lands. Initiation of a NEPA review would be an unnecessary waste of taxpayer dollars in a time of fiscal constraint.

In addition to the program being subject to NEPA review on refuge lands, any request to conduct aerial control on 22G lands within the refuge would be subject to a compatibility determination. Intensive management is not compatible with the purposes of the Kenai Refuge, the mission of the National Wildlife Refuge System, nor federal laws and policies which govern refuge management. We would therefore consider the time dedicated to such a review to also be a waste of public tax dollars.

As noted in our March 2011 BOG comments, Defenders is also concerned about the practicality of conducting an aerial wolf control program in 15A. Unit 15A is poorly suited to aerial shooting of wolves due to the forested nature of much of the terrain. Wolves are very difficult to track and shoot in this area and pilots cannot land to retrieve carcasses. Aerial shooting would therefore likely be ineffective in influencing overall wolf numbers in this unit and would result in the waste of a valuable wildlife resource.

Considering that 15A is relatively populated and heavily visited by a variety of recreational users, allowing aerial wolf control would also create a human safety risk and would likely result in increased conflict between user groups. As stated by the regional biologist, "It's likely this will be a highly visible program if it's implemented." The concern over public safety is exacerbated by ADF&G's plan to allow privately permitted citizens to participate in the program. Defenders has long opposed the involvement of private citizens in Alaska's aerial wolf control programs. Allowing private citizens to participate in this program would be especially controversial.

Both the Alaska Constitution and the Intensive Management Statute require the Board of Game to manage wolves on a sustained yield basis. *West v. State, Bd. of Game*, 248 P.3d 689, 696-98 (Alaska 2010). According to the Fish and Wildlife Service, recent and robust wolf population surveys have not been completed in 15A; however, ADF&G's plan states that the wolf population is estimated at 41-45 wolves. Despite the professional difference of opinion with regards to robustness of the available population data, we question the basis for the population target of 15 wolves absent an analysis of the implications for the wolf population.

Considering that the Kenai is relatively isolated from interior populations, we are also concerned that the genetic diversity of these populations will be threatened in the long term; especially considering that the programs – once initiated – do not typically end. Absent an evaluation of the affect wolf control would have on wolf population sustainability in 15A, passage of proposal 35 would violate the BOG's constitutional responsibility to manage wolves on a sustained yield basis.

In addition to the significant concerns addressed above, current conditions in 15A do not meet the predator control implementation criteria of the Intensive Management Statute.

Alaska law requires the Board of Game to:

adopt regulations to provide for intensive management programs to restore the abundance or productivity of identified big game prey populations as necessary to achieve human consumptive use goals of the board in an area where the board has determined that: ... (2) depletion of the big game prey population or reduction of the productivity of the big game prey population has occurred and may result in a significant reduction in the allowable human harvest of the population; *and* (3) enhancement of abundance or productivity of the big game prey population *is feasibly achievable* utilizing recognized and prudent active management techniques AS 16.05.255(e)(2), (3) (emphases added).

However, the Board of Game is not to implement intensive management programs where such programs would be "ineffective, based on scientific information" or "inappropriate due to land ownership patterns." AS 16.05.255(f)(1)(A), (B).

Both of these provisions apply here and, therefore, intensive management is not an appropriate solution to declining moose populations in unit 15A. First, proposal 35 is not supported by scientific information. The record is clear that habitat, not predation, is currently limiting moose populations in Unit 15A. The record is also clear that the potential for moose populations to again reach historic levels is unlikely due in part to increasing human settlement on the peninsula. Further, as

habitat is currently limiting, increasing the moose population could negatively affect population productivity.

Second, proposal 35 is inappropriate due to land ownership patterns. The land ownership patterns in 15A erode the potential success of aerial wolf control and again preclude such a program from meeting the criteria of the Intensive Management Statute.

Due to constraints of land ownership, the plan could only be implemented on the < 3% of lands in the unit managed by the state. At the March, 2011 meeting ADF&G biologists stated on the record that they did not believe that an aerial wolf control program would feasibly achieve the objective of increasing moose abundance in 15A due to the small scale at which it could be conducted.

The state is well aware of the limitations on conducting this program in an area whose land base is mostly under federal management. Passing a plan that includes refuge lands when it is well known that it cannot be implemented on such lands does not overcome the requirements of the Intensive Management Statute that the program be deemed appropriate under land ownership patterns.

Because current biological circumstances do not warrant predator control, and because the feasibility and potential effectiveness of aerial wolf control are in doubt, an aerial wolf control program cannot be instituted in 15A under the Intensive Management Statute.

<http://homertribune.com/2011/10/aerial-wolf-hunt-proposed-on-peninsula/>

http://www.homernews.com/stories/100511/news_awct.shtml

~~Proposals 36. We oppose this proposal and urge the BOG to reject it.~~

This proposal, if adopted, would approve an intensive management plan for moose in 15C.

Again, we have substantial concerns over the fact that the BOG has inhibited public participation by providing ADF&G insufficient time for this plan to be developed thus preventing its inclusion in the November proposal book. The BOG has further hampered participation by considering this proposal in Barrow far from the communities that will be directly affected by the BOG's decision. We have outlined such concerns in past comments to the BOG and consider the continuation of such practices to be detrimental to the public process through which such controversial proposals are adopted. We request, in the very least, that consideration of this plan be moved to the January meeting in Anchorage in order

to allow for participation of individuals who will be directly impacted should the proposal pass.

During the March 2011 meeting, the BOG directed the ADF&G to develop an intensive management plan that included aerial wolf control for Unit 15C. The preliminary plan, which included aerial wolf control, was released October 17th, 2011. We vigorously oppose aerial wolf control in this unit. Wolf control is not biologically warranted, appropriate, or feasible in Unit 15C.

Like 15A, implementing aerial wolf control in Unit 15C is not supported by current biological conditions. For this reason, ADF&G recommended "Do Not Adopt" for March meeting proposals 172 and 173 which called for aerial taking of wolves in all of Unit 15 under intensive management. The agency's rationale was that "Unit 15C is currently within intensive management objectives for both population size and harvest."

In addition to recommendations on these proposals, ADF&G's extensive testimony regarding 15C during the March meeting clearly demonstrate the agency's belief that the current low bull: cow ratio in Unit 15C is not the result of predation but of an insufficient harvest strategy which failed to protect an adequate number of young bulls. As a result, the bull: cow ratio has declined. The BOG appropriately responded to this decline by implementing new harvest restrictions. During their testimony, ADF&G indicated that illegal harvest may also be playing a role in the current moose population conditions in the unit.

Despite the fact that overharvest of bulls was implicated as the cause for decline in the bull: cow ratio in prior ADF&G testimony and documents, the recently released plan does not refer to overharvest of bulls as being a factor. Rather, the plan states that the goal of wolf control is to "reduce calf mortality to reverse the long-term decline of the bull: cow ratio." The plan goes on to state that the three major predators in the unit are brown bears, black bears, and wolves; significantly, humans are missing from the list. We find the omission of the human element to this decline disconcerting considering that all actions by ADF&G and the BOG to date indicate that overharvest of bulls was the primary cause of the decline.

Just as the low bull: cow ratio cannot be traced to wolf predation, evidence has not been presented that productivity and calf survival has been influenced by predation. Unfortunately, during the March meeting, several BOG members continually contended that moose productivity and calf survival have declined in Unit 15C; however, the facts simply do not support these assertions. According to testimony and evidence presented by ADF&G, productivity remains stable in the unit and low calf survival is not implicated as a cause for a decline in the bull: cow ratio.

In addition to factors outlined above, the population of moose is well within population objectives in 15C. In fact, according to the plan, the population increased 40% between 1992 and 2010. Though the moose harvest will be temporarily limited due to new harvest restrictions, clearly the population continues to grow. Considering that the recently initiated harvest strategy is expected to protect a sufficient number of bulls, there is no reason to believe that productivity of this population will decline. Controlling wolf predation to improve productivity is simply not warranted.

The plan indicates that the predation control area includes "all lands within Unit 15C north of Kachemak Bay including the Fox River Flats." As in 15A, a portion of 15C consists of the Kenai National Wildlife Refuge which would be exempt from this program. Though authorization to conduct aerial control may be sought, ADF&G is well aware that any proposal to conduct control on the refuge would be subject to NEPA review. We oppose the initiation of such a review. The Unimak Island decision has already clearly demonstrated that the Intensive Management Statute is inconsistent with federal refuge policy. We are therefore confident that aerial control of wolves would ultimately be rejected on Kenai Refuge lands. Initiation of a NEPA review would be an unnecessary waste of taxpayer dollars in a time of fiscal constraint.

As noted in our comments on proposal 35, Defenders also has concerns over the practicality of conducting an aerial control program in 15C. Unit 15C is poorly suited to aerial wolf control due to the forested nature of much of the terrain. Wolves are very difficult to track and shoot in this area and pilots cannot land to retrieve carcasses. Allowing aerial shooting would therefore likely be ineffective in influencing overall wolf numbers in this unit and result in the waste of a valuable wildlife resource.

~~Considering that 15C is relatively populated and heavily visited by a variety of recreational users, allowing aerial wolf control would also create a human safety risk and would likely result in increased conflict between user groups. As stated by the regional biologist, "It's likely this will be a highly visible program if it's implemented."~~ The concern over public safety is exacerbated by ADF&G's plan to allow privately permitted citizens to participate in the program. Defenders has long opposed the involvement of private citizens in Alaska's aerial wolf control programs. Allowing private citizens to participate in this particular program would be especially controversial.

Section 3c. of the plan states that "a reduction of predation can reasonably be expected to aid in continuing to meet the intensive management harvest objectives at a higher level than have previously been achieved through both bull and antlerless harvest." However, the limitations of likely success of the program, given the terrain as well as social factors, throw this opinion into question. Further, the

highly productive nature of this moose population does not warrant control of predation to improve moose harvest.

In addition to concerns over the potential for the program to achieve stated goals, we also question the 15C plan's reliance on the operational plan and FA for proposal 35 (see section 7). Both the plan and FA were developed solely for Unit 15A where population concerns are substantially different than those of 15C. Since ADF&G has only recently developed the FA process in order to facilitate proper evaluation of intensive management programs, and considering that ADF&G biologists have been working to complete the FAs since March of this year, we are disappointed that an FA is not yet available for 15C. We are equally concerned that a full independent plan is not yet available.

Both the Alaska Constitution and the Intensive Management Statute require the Board of Game to manage wolves on a sustained yield basis. *West v. State, Bd. of Game*, 248 P.3d 689, 696-98 (Alaska 2010). According to ADF&G, recent and robust wolf population surveys have not been completed in 15C. While we are pleased to see that wolf surveys are being planned, ADF&G indicated during their testimony at the March 2011 BOG meeting that the timeframe imposed for developing the wolf control plan limited their ability to complete a wolf census to include in the plan.

Though a population of 40-75 wolves is estimated to exist in the 15C, this number is based on extrapolation from other areas on the peninsula where the robustness of the data is also in question (see comments on proposal 35). Without robust data on wolf populations in 15C, the BOG will be unable to evaluate the affect wolf control would have on wolf population sustainability. Further, as in our comments on proposal 35, we question the basis for determining a population target of 15 wolves would adequately insure persistence of wolves in the unit. Passage of proposal 36, absent information on how the wolf population will be affected by the planned reduction, would violate the BOG's constitutional responsibility to manage wolves on a sustained yield basis.

The current conditions in 15C do not meet the predator control implementation criteria under the Intensive Management Statute and regulations.

Alaska law requires the Board of Game to:

adopt regulations to provide for intensive management programs to restore the abundance or productivity of identified big game prey populations as necessary to achieve human consumptive use goals of the board in an area where the board has determined that: ... (2) *depletion of the big game prey population or reduction of the productivity* of the big game prey population has occurred and may result in a significant reduction in the

allowable human harvest of the population; *and* (3) enhancement of abundance or productivity of the big game prey population *is feasibly achievable* utilizing recognized and prudent active management techniques. AS 16.05.255(e)(2), (3) (emphases added).

However, the Board of Game is not to implement intensive management programs where such programs would be “ineffective, based on scientific information.” AS 16.05.255(f)(1)(A). When implementing the Intensive Management Statute, AS 16.05.255(e) - (g), the Board of Game

“will ... (3) find that depletion of a big game prey population or reduction of the productivity of a big game prey population has occurred when (A) the number of animals, estimated by the department, that can be removed by human harvest from a population, or a portion of a population, on an annual basis without reducing the population below the population objective, preventing growth of the population toward the population objective at a rate set by the board, or altering a composition of the population in a biologically unacceptable manner *is less than the harvest objective for the population; and (B) the population size is less than the population objective* for the population...(5) *not* consider as significant...(B) any reduction in taking that is *intended or expected to be of a short-term and temporary nature* and is necessary for the conservation of the population. 5 AAC 92.106(3)(A)-(5)(B) (emphases added).

Moose population concerns in 15C are not driven by wolf predation but the result of an insufficient harvest strategy which has potentially been exacerbated by illegal harvest. The current low bull: cow ratio has resulted in recent temporary harvest restrictions which are necessary to prevent the continued overharvest of bulls and promote the conservation of the population. The moose population in this region ~~cannot be considered depleted and there is no indication that productivity has declined.~~ Though ADF&G does not believe that productivity has declined, if bulls are not adequately protected, a decline could occur. Because local biologists currently consider productivity and calf survival to be within acceptable levels, and the moose population remains within population objectives, this temporary closure can be expected to improve the bull: cow ratio and conserve a healthy moose population.

The ADF&G and BOG explicitly recognized the temporary nature of this closure during the harvest restriction testimony and subsequent discussion at the March meeting. The BOG further recognized the closure as temporary by adding a sunset clause to the harvest restriction; stating that they would reevaluate population parameters and reconsider the regulations at the March 2013 meeting. Control of predation would not achieve the desired result of increasing bull recruitment

because wolves do not selectively prey on bull moose and problems with calf productivity have not been identified.

Under current circumstances aerial wolf control in Unit 15C is neither warranted biologically nor is it appropriate under the Intensive Management Statute or regulations.

Proposal 37. We offer the following comments on this proposal.

According to ADF&G the Southern Alaska Peninsula Caribou Herd (SAPCH) has increased in size since the Unit 9D wolf control program was initiated in 2007; however, sufficient study has not been dedicated to factors other than predation that may be contributing to preliminary indications of increased survival. We continue to have concerns that this program does not meet several recommendations of the NRC.

1. The status of the predator population has not been evaluated.

The updated SAPCH plan states that no current aerial population survey data are available for the wolf population in the management area. Instead, predator populations are estimated using anecdotal evidence from pilots and local residents. While anecdotal information may be sufficient to supplement aerial surveys during years when surveys are not conducted, they are not adequate on their own in areas where predator control is being conducted.

2. Carrying capacity has not been determined nor sufficient monitoring programs developed.

While the revised plan states that nutritional limitations are not implicated as a factor affecting the current status of the SAPCH, the program continues to lack nutritional objectives and fails to outline a protocol for monitoring trends in nutritional condition indices. Further, habitat studies aimed at determining carrying capacity have not been conducted.

Defenders has long documented concerns over the potential for habitat degradation to occur in areas where predators have been suppressed. We find it a significant deficiency that the SAPCH program does not incorporate requirements for nutritional status and that population goals are not based on carrying capacity.

3. The programs are not designed as experiments and inadequate data is collected.

According to the February 2011 annual report to the BOG, this program utilizes Unimak Island as a control to compare trends in magnitude, abundance and

composition. Given that Unimak is an island and island populations perform in a manner unlike mainland populations, we find that the control is scientifically unacceptable.

Defenders supports the more targeted approach being utilized on the Southern Alaska Peninsula, whereby wolves active on calving grounds are taken by management personnel, as opposed to the broad and indiscriminant approach involving privately permitted citizens in other areas. However, we continue maintain that these programs generally lack adequately developed plans and underlying scientific study.

Predator control remains a controversial issue in Alaska. Only by clearly demonstrating that predator control is actually achieving stated goals, that habitat is not being over-utilized, and that predator populations and ecosystems are being adequately protected will ADF&G earn increased trust over this issue. This cannot be achieved in the absence of adequate data collection and management planning. The National Research Council (NRC) 1996 recommendations were aimed at improving management of Alaska's predator and prey populations. We will continue to oppose all predator control programs that do not meet the basic recommendations set by the NRC.

Thank you for considering our comments.

Sincerely,

Theresa Fiorino
Alaska Representative
Defenders of Wildlife

On-Behalf of:

Valerie Connor
Conservation Director
Alaska Center for the Environment

John Toppenberg
Executive Director
Alaska Wildlife Alliance

The Alaska Center for the Environment (ACE) is a non-profit environmental education and advocacy organization, whose mission is to enhance Alaskans' quality of life by protecting wild places, fostering sustainable communities and promoting recreational opportunities. ACE advocates for sustainable policy on behalf of over 6,000 Alaskan members.



Founded in 1978, the Alaska Wildlife Alliance is the only group in Alaska solely dedicated to the protection of Alaska's wildlife. Their mission is the protection of Alaska's natural wildlife for its intrinsic value as well as for the benefit of present and future generations.



Game Management Unit 15A Intensive Management Feasibility Assessment

1) Purpose

This report serves as a feasibility assessment (FA) for conducting Intensive Management (IM) actions in Game Management Unit 15A. The FA is premised on the *Guidelines for intensive management of big game in Alaska* recently created by the Alaska Department of Fish & Game (ADFG). The ADFG has formalized IM guidelines and FAs for areas considered for IM. The Board typically assesses feasibility prior to adopting an IM program. The Board is not required to adopt regulations to provide for an intensive management program per AS 16.05.255(f)(1) if a proposed IM program is:

- (A) ineffective, based on scientific information
- (B) inappropriate due to land ownership patterns
- (C) against the best interest of subsistence uses

2) Definition of populations, recommended strategy, and measures of progress

The moose population in Unit 15A was identified as an IM population (5 AAC 92.108) when the IM law took effect. In 2000, the IM objectives for Unit 15A moose were established (5 AAC 92.108): the population objective is 3000-3500 moose with a harvest objective of 180-350. The moose population in Unit 15A has been below IM population objectives before the objective was established in 2000 and has not met objectives to date. The moose harvest in Unit 15A has been below the IM objective in 10 of the 11 years since the objective was established in 2000.

Based on thorough studies of the moose population response in Unit 15A to fire, which creates and improves moose browse, the management strategy for Unit 15A moose is to focus on improving habitat. While Unit 15A shows a rich history of fires over the past century, there has not been a habitat rejuvenating fire of any significant size in over 40 years. The large scale fires of 1947 (about 300,000 acres) and 1969 (about 80,000 acres) indicate that you obtain 20-25 years of quality moose habitat post fire. Currently, the deterioration of the available moose browse is obvious. The main measure of progress toward achieving the goal of improving moose habitat will be based on the size and frequency of future fires (both wildfire and controlled burns) and the concomitant (albeit delayed) response of moose to the fire.

A key consideration in the feasibility of any IM program for moose in Unit 15A whether through habitat enhancements (i.e., conducting controlled burns or not suppressing wildfires) or other IM activities is cooperation and collaboration with the principal land manager, the Kenai National Wildlife Refuge (KNWR), who manage 79% of the area of Unit 15A, which includes approximately 232,000 acres that is classified as Wilderness. There is an insignificant amount of State land in Unit 15A (12,500 acres or <2% of the total land in Unit 15A) to accomplish any meaningful IM actions alone without support from the KNWR. Any successful IM program must have support and cooperation of the KNWR.

3) Elements of feasibility assessment for moose in Unit 15A

A) Biological

I. Non-predation and non-hunting mortality

- a) While severe winters (snow depths >36 inches) do occur in Unit 15A, they occur relatively infrequently and such weather events would not deter the long-



Game Management Unit 15A

Intensive Management Feasibility Assessment

term recruitment of moose should the productivity of the population increase due to habitat improvements.

b) Vehicle caused mortality on moose in the southern portion of Unit 15A is significant and in the past decade has equaled roughly 35% of the combined human caused mortality of hunter harvest and known vehicle caused mortality. Furthermore, most of this vehicle caused mortality is on cows and calves, and, therefore, affects the productivity of the moose population more than the bull-only harvest. However, we do not believe that road-kills, given the limited road system in Unit 15A, would prevent the long-term recruitment of moose should the productivity of the population increase due to habitat improvements.

c) There is no known significant prevalence of disease or parasites in the Unit 15A moose population.

II. Access for predator reduction or ungulate harvest

Approximately 79% of Unit 15A is federal land managed by the KNWR. Access on the Refuge limits the use of off-road vehicles (motor boats, ATVs, airplanes, snowmachines) to various degrees. (Specific Refuge restrictions are listed in the Appendix A of this report).

a) The estimated availability of all-season roads: within the KNWR (and outside of the majority of the human-population areas around Soldotna, Kenai, Sterling, and Nikiski), the only access road is the Swanson River road that extends roughly 15 miles north of the Sterling Highway in the central portion of Unit 15A. There is also a seasonal gravel/dirt road (Mystery Creek Road) that extends north approximately 20 miles north of the Sterling Highway in the eastern portion of Unit 15A and it is typically closed from October - July.

b) The estimated amount of ATV trails is unknown but considering there is no ATV access on the KNWR and <20mi² of State land in Unit 15A, the extent of ATV trails that provide significant access to the area is limited to the undeveloped and unmaintained trail (pipeline road) of about 30 miles which starts north of Captain Cook State Park on the northwest coast of Unit 15A and ends near Point Possession, all outside the KNWR boundaries.

c) The exact availability (in miles) of navigable rivers is unknown but is somewhat limited by the KNWR restrictions.

d) The feasibility of landing fixed-wing aircraft in winter throughout Unit 15A is somewhat limited due to KNWR restrictions.

e) The feasibility of ocean shoreline access is low considering the lack of sufficient moorings and high tidal action.



Game Management Unit 15A

Intensive Management Feasibility Assessment

III. Potential effectiveness of predator control

- a) Are there concentrated calving and/or rearing areas of ungulates that justify focused bear or wolf control? Concentrations are unknown.
- b) Are there concentrated winter ranges of ungulates suitable for focused wolf control? The areas of highest winter moose concentrations are along the human residential areas. However, the current low density of moose in Unit 15A is due to the poor quality of the habitat. If predator densities were reduced to increase moose numbers without concomitant wide-spread improvements to the habitat, any increases to moose survival would further increase the nutritional stress of the moose population thereby reducing productivity. Although the moose population has declined about 50% in the past 2 decades, the moose density in Unit 15A is currently (the last census was conducted in 2008) about 1.3 moose/mi², which is within the density objectives of many moose populations around the State.

IV. Potential effectiveness of predator control through public participation

- a) Number of communities and residents within proposed management area. Soldotna, Kenai, Sterling, and Nikiski are the major communities in Unit 15A and comprise the vast majority of the approximate 50,000 human population on the Kenai Peninsula.
- b) Estimated wolf harvest rate. While we do not have data to allow such a calculation of harvest rate, the approximate harvest rate according to the best available data shows a harvest rate of approximately 20-25% of the fall population the 3 most recent Regulatory Years. The exact harvest rate is unknown, but the average harvest is about 10 wolves per Regulatory Year.
- c) Estimated black bear harvest rate. We do not know current black bear densities. If we use densities calculated in the 1980s, the yearly harvest rate in Unit 15A would be approximately 7-9%. The exact harvest rate is unknown.
- d) Estimated grizzly/brown bear harvest rate. We do not know brown bear densities and brown bears are known to have large ranges that extend outside of the Unit 15A boundary. Without an approximate density and knowing that Unit 15A is not a closed population, we are unable to calculate the harvest rate of brown bears.

V. Ability to confirm treatment response in treatment (e.g., predator control, habitat enhancement, or non-typical harvest) areas with data from nearby and comparable untreated areas through assessment of:

- a) Fall composition surveys for young to adult female ratio. We would have this index for moose in Unit 15A to compare with past data.



Game Management Unit 15A

Intensive Management Feasibility Assessment

- b) Fall composition surveys for yearling to adult female ratio. We would have this index for moose in Unit 15A to compare with past data.
- c) Other metrics? We could also estimate population size of moose in Unit 15A as an overall measure of a treatment response.

B) Societal elements: define hunting conflicts (e.g., constraints to access, acceptable methods, and harvest expectations) and public tolerance for intensive management practices

Overall potential to mitigate hunting conflicts is low considering limitations on access and lack of State land (<2% of land in Unit 15A).

I. Expectation for target ungulate harvest that may limit ability of the Department to control growth of ungulate populations for managing nutritional condition or public conflicts.

The ADFG believes that should the productivity of the moose population in Unit 15A improve due to wide-scale habitat improvements, the Area Managers would plan to increase the harvest through gender and age specific harvests similar to what is being achieved in Unit 20A. The ADFG predicts that a harvest based on nutritional constraints and maximized productivity would be supported by the public.

The Department would like the Board of Game to consider changes to the IM population and harvest objectives as the population responds to habitat enhancement to maximize the productivity of the moose population for the greatest time period. While access is limited by the KNWR, hunters would certainly maximize their hunt success across much of Unit 15A.

There are certainly constraints regarding public acceptance of both controlled burns and wildfire. Fire threats to residential areas would and should limit the use of fire near residences. However, even in remote areas (i.e., federal wilderness designations with limited suppression), health and aircraft safety issues associated with smoke both on the Kenai Peninsula and Anchorage has and will result in the suppression of fires that may have burned without any threat to residential areas or established oil/gas structures on the KNWR.

II. Land Ownership that may restrict access for predator control or ungulate harvest.

The KNWR manages approximately 79% of the land in Unit 15A, which includes 232,000 acres designated Wilderness. Because the KNWR would likely not support any form of predator control on their lands, there is no foreseeable issue regarding public acceptance of predator control methods. The fact that <2% of State land exists in Unit 15A prevents the efficacy of predator control outside of Federal land in Unit 15A.



Game Management Unit 15A

Intensive Management Feasibility Assessment

C. Economic elements define estimated costs of management programs and expectations for public participation in predator control programs for comparison to perceived benefits.

Considering that the IM activities that are needed are controlled burns or non-suppression of wildfire, there is no anticipated public participation based on expense and other factors. We do not believe that hunter participation after an increase in the moose productivity following wide-scale habitat improvements will be an issue. While hunter access is restricted to some degree in the KNWR, there are enough access points that hunters would certainly take advantage of increase hunting opportunities.

There are obviously costs associated with managing fires or conducting controlled burns. These costs are substantial and would be incurred by the land manager and State Forestry.

Because the KNWR would not support any form of predator control on their lands, there is no foreseeable issue regarding expense (public or other) for predator control methods. The fact that <2% of State land exists in Unit 15A prevents the efficacy of predator control outside of Federal land in Unit 15A.

4) Availability of biological and harvest information on population status of predators and ungulate species for modeling ungulate population growth rates and time until increase in harvest of ungulates is feasible

Sufficient data would be available to model moose population growth in order to design an effective management plan. Periodic abundance surveys and yearly composition counts have been and will be available metrics for managers. Furthermore, when moose productivity increases following wide-scale habitat improvements, the Department would likely increase efforts to monitor productivity (e.g., pregnancy rates, body condition, parturition rates, etc.). Harvest has and will be monitored in the future.

Little data exists for predator densities in Unit 15A. While moose predation by wolves and bears certainly occurs, the moose population in Unit 15A is currently limited by habitat conditions. There is an abundant body of literature from studies conducted in Unit 15 that document the response of moose to habitat conditions after fire. Roughly 20 years post-fire, moose have reached their maximum numerical response to the improved habitat and at 40 years post-fire due to the successional advance of the moose browse, moose densities are back down to densities before the fire. If predator densities were reduced to increase moose numbers without concomitant wide-spread improvements to the habitat, any increases to moose survival would further increase the nutritional stress of the moose population thereby reducing productivity. Although the moose population has declined about 50% in the past 2 decades, the moose density in Unit 15A is currently about 1.3 moose/mi², which is within the density objectives of many moose populations around the State. Area managers will closely monitor available browse after fire to determine browsing pressure that will determine along with other measures how to maximize hunting pressure to keep the moose population below carrying capacity and, therefore, at its maximum productivity.

5) Overall potential to increase moose harvest in Unit 15A within 6 years is low. The ability to document reasons for success or failure is high



Game Management Unit 15A

Intensive Management Feasibility Assessment

The current moose population in Unit 15A is clearly limited by habitat conditions. Any increases in the productivity and population size of moose in Unit 15A will be dictated by the frequency and size of any future fires. Due to the unpredictable nature of wildfire, the constraints imposed by the KNWR for fire suppression, and the cost and risks imposed by controlled burns, it is not realistic to predict the occurrence of a significant fire that would improve the current status of moose in Unit 15A. The ADFG and the Board of Game can maintain open dialogue with the KNWR and the State Division of Forestry regarding fire suppression and controlled burn issues but neither the ADFG nor the Board of Game has the authority to make determinations on fire management decisions.

Because the primary limiting factor affecting the moose population in Unit 15A is poor habitat conditions and because <2% of the land in Unit 15A is State owned, there is little justification for pursuing IM actions with predator control.

The potential to achieve IM objectives in the defined period should be defined as:

- a) Population increase in ungulates required to reach lower IM population objective equals approximately a 50% increase.
- b) Percentage increase in average estimated harvest (last 3 RYs) to reach lower IM harvest objective equals approximately a 68% increase

6) Recommendations for public involvement to define measures of success, acceptable methods for enhancing populations and harvest, and risk tolerance

Considering wildfire and controlled burns are the main mechanisms needed to bring the moose population in Unit 15A back within IM objectives, the public is somewhat limited in what their involvement can be. Certainly public acceptance of installing fire breaks along the Refuge borders, tolerance of smoke from fires, and other measures to reduce the choice of fire suppression by the Refuge and State Forestry is welcomed and encouraged. Furthermore, public tolerance and encouragement of the Refuge and State Forestry to conduct controlled burns would be beneficial and may also help land managers make decisions not to suppress fires in areas designated under limited suppression.

There is a trade-off with improving moose habitat via fire. Typically, threats to structures (e.g., homes, oil/gas infrastructure, power lines, etc.), hazards associated with smoke (e.g., health, aircraft safety), and demands of fire crews throughout the state quickly trump desires to rejuvenate moose habitat. Certainly, fires that threaten human health and safety are and should be justifiably suppressed. However, under certain favorable conditions, the fires that occur in isolated areas with designations under limited suppression should receive the support by the public and land managers to burn. Public input and demand in these circumstances may help influence land managers in allowing certain fires to burn.

Summary

Considering the land ownership patterns in Unit 15A and the lack of a significant fire during the past 40 years, addressing the question of whether the "enhancement of abundance or



Game Management Unit 15A

Intensive Management Feasibility Assessment

productivity of the big game prey population is feasibly achievable utilizing recognized and prudent active management techniques" [AS 16.05.255(e)(3)] , the Department believes that traditional IM practices are not feasible. The Department does intend to foster a cooperative relationship with the KNWR and to help ensure the State has a voice in encouraging the use of controlled burns and limited suppression of wildfire to improve the status of moose habitat in Unit 15A.

The Board is not required to adopt regulations to provide for an intensive management program per AS 16.05.255(f)(1) if a proposed IM program is: (A) ineffective, based on scientific information, (B) inappropriate due to land ownership patterns, (C) against the best interest of subsistence uses. The Department believes that traditional predator control actions would be ineffective in helping the moose population given the current poor condition of the habitat. Furthermore, the Department acknowledges that 79% of the land is managed by the KNWR who may reject any predator control programs on their land; and <2% of Unit 15A is State land which would be available for IM activities.



Game Management Unit 15A

Intensive Management Feasibility Assessment

Appendix A. Description of restrictions on the KNWR that pertain to Unit 15A

1.) Aircraft

The operation of aircraft on the Kenai NWR, except in an emergency, is permitted only as authorized in designated areas as described below. These areas are also depicted on a map available from refuge headquarters.

Within the Canoe Lakes, Andy Simons, and Mystery Creek Units of the Kenai Wilderness, only the following lakes are designated for airplane operations:

Canoe Lakes Unit

Pepper, Gene, and Swanson Lakes are only open for sport ice fishing.

Scenic Lake	Grouse Lake	Snowshoe Lake
Nekutak Lake	King Lake	Wilderness Lake
Shoepac Lake	Bedlam Lake	Mull Lake
Norak Lake	Taiga Lake	Tangerra Lake
Bird Lake	Cook Lake	Sandpiper Lake
Vogel Lake		

Mystery Creek Unit

An unnamed lake in section 11, T. 6 N., R. 5 W., S.M., AK.

(B) Airplanes may operate on all lakes outside the Kenai Wilderness except those lakes with recreational developments, including, but not limited to, campgrounds, campsites, and public hiking trails connected to road-waysides. The non-wilderness lakes closed to aircraft operations are as follows:

North of the Sterling Highway

Cashka Lake	Rainbow Lake	Anertz Lake
Dolly Varden Lake	Dabbler Lake	Weed Lake
Nest Lakes	Lily Lake	Silver Lake
Mosquito Lake	Forest Lake	Breeze Lake
Watson Lake	Upper Jean Lake	Imeri Lake
Afonasi Lake		



Game Management Unit 15A

Intensive Management Feasibility Assessment

All lakes in the Skilak Loop Area (South of Sterling Highway and North of Skilak lake) are closed to aircraft except that airplanes may land on Bottenintnin Lake, which is open year-around and Hidden Lake, which is only open for sport ice fishing.

(ii) Notwithstanding any other provision of these regulations, the operation of aircraft is prohibited between May 1 and September 30, inclusive, on any lake where nesting trumpeter swans and/or their broods are present except Scenic and Lonesome Lakes where the closure is between May 1 and September 10, inclusive.

(iii) the operation of wheeled airplanes, at the pilot's own risk, is authorized on the unmaintained Big Indian Creek Airstrip

(iv) Unlicensed aircraft are permitted to operate on the refuge only as authorized by a special use permit from the refuge manager.

(v) Airplanes may operate only within designated areas on the Chickaloon Flats, as depicted on a map available from the refuge manager.

(vi) Airplane operation is permitted on the Kasilof River, the Chickaloon River outlet, and the Kenai River below Skilak Lake from June 15 through March 14. All other rivers on the refuge are closed to aircraft.

2). Motorboats

Motorboats are authorized on all waters of the refuge except under the following conditions and within the following areas:

(i) Motorboats are not authorized on lakes within the Canoe Lakes Unit of the Kenai Wilderness except those lakes as designated for airplane operations as described on a map available from the refuge manager. ~~Boat motor use is not authorized on those portions of the Moose and Swanson Rivers within the Canoe Lakes Unit of the Kenai Wilderness.~~

(ii) That section of the Kenai River from the outlet of Skilak Lake downstream for three miles is closed to motorboat use between March 15 and June 14, inclusive. However, any boat having a motor may drift or row through this section provided the motor is not operating.

(iii) That section of the Kenai River from the power line crossing located approximately one mile below the confluence of the Russian and Kenai Rivers downstream to Skilak Lake is closed to motorboats. However, any boat having a motor attached may drift or row through this section provided the motor is not operating.

(iv) Motors in excess of 10 horsepower are not authorized on the Moose, Swanson, Funny, Chickaloon (upstream of river mile 7.5), Killey, and Fox Rivers.



Game Management Unit 15A

Intensive Management Feasibility Assessment

(v) A "no wake" restriction applies to Engineer, Upper and Lower Ohmer, Bottenintnin, Upper and Lower Jean, Kelly, Petersen, Watson, Imeri, Afonasi, Dolly Varden, and Rainbow Lakes.

(vi) Notwithstanding any other provisions of these regulations, operation of a motorboat is prohibited between May 1 and September 30, inclusive, on any lake where nesting trumpeter swans and/or their broods are present, except Windy, Scenic, and Lonesome Lakes where the closure is between May 1 and September 10, inclusive.

3. Off-road vehicles

(i) The use of air cushion, airboat, or other motorized watercraft, except motorboats, is not allowed on the Kenai NWR, except as authorized by a special use permit from the refuge manager.

(ii) Off-road vehicle use, including operation on lake and river ice, is not permitted. Licensed highway vehicles are permitted on Hidden, Engineer, Kelly, Petersen, and Watson Lakes for ice fishing purposes only, and must enter and exit lakes via existing boat ramps.

4. Snowmachines

Operation of snowmobiles is authorized on the Kenai NWR subject to the following conditions and exceptions:

(i) Snowmobiles are permitted between December 1 and April 30 only when the refuge manager determines that there is adequate snow cover to protect underlying vegetation and soils. During this time, the manager will authorize, through public notice, the use of snowmobiles less than 46 inches in width and less than 1,000 pounds (450 kg) in weight. Designated snowmobile areas are described on a map available from the refuge manager.

~~(ii) All areas above timberline are closed to snowmobile use.~~

(iv) An area, including the Swanson River Canoe Route and portages, beginning at Paddle Lake parking area, then west and north along the Canoe Lakes wilderness boundary to the Swanson River, continuing northeast along the river to Wild Lake Creek, then east to the west shore of Shoepac lake, south to the east shore of Antler Lake, and west to the beginning point near Paddle Lake, is closed to snowmobile use.

(v) An area, including the Swan lake Canoe Route, and several road-connected public recreational lakes, bounded on the west by Swanson River Road, on the north by the Swan Lake Road, on the east from a point at the east end of Swan lake Road south to the west bank of the Moose River, and on the south by the refuge boundary, is closed to snowmobile use.

(vi) Within the Skilak Loop Special Management Area, snowmobiles are prohibited except on Hidden, Kelly, Petersen, and Engineer Lakes for ice fishing access only. Upper and Lower



Game Management Unit 15A

Intensive Management Feasibility Assessment

Skilak Lake campground boat launches may be used as access points for snowmobile use on Skilak Lake.

(vii) Snowmobiles may not be used on maintained roads within the refuge. Snowmobiles may cross a maintained road after stopping and when traffic on the roadway allows safe snowmobile crossing.



WHO IS LIKELY TO BENEFIT? All users, both consumptive and non-consumptive will benefit in the long term. There may not be an immediate benefit, but if nothing is done, our moose population will continue to decline, resulting in lost opportunities for all users.

WHO IS LIKELY TO SUFFER? Hunters will continue to suffer lost harvest opportunities until the bull to cow ratio and overall population improves.

OTHER SOLUTIONS CONSIDERED: Eliminate only the fork regulation and allow the harvest of spike-antler bulls. This would allow some additional harvest opportunity, but would not be as effective and swift as a recovery effort. This would also be likely to be confusing to hunters in adjoining subunits in discerning multiple regulations.

PROPOSED BY: Kenai/Soldotna Fish and Game Advisory Committee

LOG NUMBER: EG110310146

PROPOSAL 174 - 5 AAC 92.125(o). Predation control areas implementation plans.

Approve a habitat based intensive management plan for the Unit 15A Northern Kenai Intensive Management Area.

Unit 15(A) encompasses 1314 square miles (840,960 acres) and includes all of unit 15A.

Approximately 80 percent of the land mass in Unit 15(A) is managed by the Kenai National Wildlife Refuge. Notwithstanding any other provisions in this title, and based on the following information contained in this section, the commissioner or the commissioner's designee may conduct an intensive management program on the Kenai Peninsula in Unit 15(A):

(1) the discussion of wildlife population and human use information is as follows:

(A) the Northern Kenai Peninsula moose population information is as follows:

(i) the most recent moose population peak occurred in 1971; the near absence of wolves from 1913-1968, and the increased moose productivity following the 1947 wildfire (approx. 309,000 acres) were two events that led to increased moose numbers throughout the 1950's and 1960's; although harvest seasons were long and either-sex harvest was allowed, the moose population increased beyond carrying capacity and extensive over-browsing occurred by the late 1960's, (ii) a wildfire in 1969 (approx. 79,000 acres) that initially reduced moose habitat in Unit 15(A), coupled with harsh winters in 1971-1974, caused the moose population in Unit 15(A) to decrease by 59 percent (from 5298 to 2175) by 1975; after the low number in 1975, new habitat created by the 1969 burn and more favorable winter conditions allowed the Unit 15(A) moose population to grow until the mid-1990's; the ADF&G conducted moose censuses in Unit 15(A) during February of 1991, 2001, and 2008 with respective point estimates of 3432, 2068, and 1670; (iii) since 1991 moose harvests followed a similar pattern, with annual variations; the peak reported harvest during this period (1991-2008) was 271 animals in 1998 and the 2008 reported harvest was 113 moose.

(iv) 75 percent of the collared adult cows in Unit 15(A) were pregnant in March 2007, as identified from blood samples; this compares to pregnancy rates of 85-90 percent in the sub-alpine portion of Unit 7 which is adjacent to Unit 15(A); lower pregnancy rates in the lower elevations indicate habitat may be limiting the growth of the population;



(v) the percent calves measured from fall surveys in the moose population for Unit 15(A) is about half of what it was during the 1990's (down from 20 percent in 2001 to 12 percent in 2008);

(vi) over-all bull ratios have been consistent since the 1990's.

(vii) the intensive management objectives for moose are as follows: moose population objective of 3,000—3,500 moose; harvest objective of 180-350 moose.

(2) the predator population and human use information is as follows

(A) wolves are a major predator of moose on the Kenai Peninsula;

(i) the wolf population in Unit 15(A) is believed to be stable; anecdotal evidence obtained from biologists, pilots, trappers, and local residents indicates that the wolf population is healthy throughout the area;

(ii) an average of 8 wolves (range of 2 to 16 wolves) have been harvested annually in Unit 15(A) since 1991/92;

(B) brown bears are also considered to be a predator of moose on the Kenai Peninsula,

(i) the extent of their predation has not been documented; while brown bears have been known to kill adult moose opportunistically, brown bears are regarded as an effective predator of calves during the first 6 weeks of life;

(ii) anecdotal information combined with available data indicate the Northern Kenai Peninsula supports a healthy brown bear population.

(iii) human caused brown bear mortalities in Unit 15(A) have averaged 7 (range, 1--16) brown bear annually from 2000 to 2008;

(C) black bears are also an important predator of moose calves during the first 6 weeks of life;

(i) black bears are considered abundant in Unit 15(A) with a 1991 population estimate of 205 black bears/1000km² in the area of the 1947 burn and 265 black bears/1000km² in the area of the 1969 burn,

(ii) black bear harvests have averaged 44 bears annually during 1991/92 – 2007/08; this compares to an annual average of 27 bears from 1973/74-1977/78;

(3) the prey population and human use information is as follows

(A) moose habitat information is as follows:

(i) the history of fire on the Kenai Peninsula has generally involved human caused fires. Natural fires from lightning strikes are rare, but have increased in frequency in recent years.

(ii) the Kenai National Wildlife Refuge initiated a fire management program in 1985 based in part from the objectives set in their moose habitat management plan.

(a) since 1970, wildfires have only burned about 10,000 acres in Unit 15(A);

(b) since 1995, controlled burns have encompassed 1795 acres in Unit 15(A);

(B) moose population objectives for Unit 15(A) are to maintain 3,000-3,500 moose; the moose population objective for Unit 15(A) is not currently being met;

(4) the commissioner may initiate a habitat enhancement program with the concurrence of relevant land owners to increase the moose population to meet the following objectives:

(A) the post hunting bull-to-cow ratio can be sustained within management objectives of at least 20 bulls per 100 cows.

(B) the fall calf-to-cow ratio can be sustained above 30 calves per hundred cows; or

(C) pregnancy rates above 85-90 percent for adult cows ;

(D) The population can grow at a sustained rate of 5 percent annually until intensive management objectives are met;

(5) the anticipated time frame and schedule for update and reevaluation are as follows:

(A) for up to 10 years beginning July 1, 2010,

(B) annually the Department shall, to the extent practicable, provide to the board a report of program activities conducted during the preceding 12 months, including implementation activities, the status of the moose population, and recommendations for changes, if necessary to achieve the objectives of the plan.

ISSUE: The Unit 15A moose population and harvest has been below Intensive Management objectives since 1999.

WHAT WILL HAPPEN IF NOTHING IS DONE? The Unit 15A moose population and harvest will likely stay below Intensive Management objective.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR PRODUCTS PRODUCED BE IMPROVED? Yes. The moose population should increase and more moose should be available for harvest.

WHO IS LIKELY TO BENEFIT? Hunters and wildlife viewers who would like more moose in Unit 15A.

WHO IS LIKELY TO SUFFER? Potentially motorists and home owners. If the population grows considerably, we will likely see an increase in moose/vehicle collisions and have more nuisance moose issues.

OTHER SOLUTIONS CONSIDERED? Reducing moose hunting opportunities in Unit 15A.

PROPOSED BY: Alaska Department of Fish and Game at the request of the Board of Game

LOG NUMBER: ADFG113010QQ

PROPOSAL 175 - 5 AAC 92.080. Unlawful methods of taking game; exceptions. Allow the use of artificial light to hunt predators in Units 15 and 7.

I would like the Board of Game to adopt a policy that would enable hunting of predators with artificial lighting. This policy would allow predator hunters to use artificial light to aid in harvesting black bear, coyote, and wolves in 15 and 7. Artificial lighting would be made legal for predator calling on the peninsula during all night hours.

ISSUE: Predators are causing a severe decline in the moose population on the Kenai. Wolf, coyote, and black bear all contribute to the decline of the calf population. Current methods of harvesting these predators is not having a significant impact on their population. Currently we are allowed to bait black bear under a permit for a specified period of time. As hunters we can hunt wolves and coyote through "predator calling" during day light hours for a specified period of time.

The Board of Game has to address the impact of the predator population on the Kenai. Failure to do so is irresponsible on their part.

ATTN Board Of Game Comments

To the board of game; regarding proposals 35 and 36

An intensive predator removal plan is needed, the proposal is only for 15A and 15C they should include the entire kenai peninsula 15B and 7.

first the numbers don't lie annual harvest averages in the 550 range drops to around 50. Its predictable if you are a hunter who spends time in the field. in my little corner of unit 7 the brown bears outnumber the moose, add a small wolf pack to exterminate moose even faster. while black bears get some calves the brown bears get the some cows as well. we up the limit on black bears no additional brown bear permits are issued. two dips on brown bear and a camera count this spring of 19 brown bear on exit glacier rd alone 4 new cubs so we are not keeping up with the natural growth of population. bulls are available and calves are born but don't make it to fall and many cows don't make it past calving. currently brown bears have a negative value to hunters because they consume the whole of the moose and black bear populations that we can hunt. no hope in sight of any management for moose only ridiculous tales of rabbits eating the moose food and tales of poor feed and low birth rates, birth rates don't count for much if they only get eaten at or before birth now add to this the huge packs of wolves, does a moose have a chance?

we hunters restricted our own harvest with antler restrictions and created a healthy heard but the brown bear is protected and with an additional protien source did very well and is in no danger of going away, however that is not the case with moose. no antler restriction will fix the moose problem, with as many brown bears and wolves moose have no chance.

I would urge an open season on brown bear peninsula wide. and a new biologist to go with it, his numbers don't add up.

Robert D White

10/24/11

Robert D. White

Po Box 201

Seward AK 99664

Ph 907-362-1453



Michele & Gene Cornelius
P.O. Box 739
Homer, AK 99603
michelescornelius@gmail.com

RECEIVED
OCT 14 2011
BOARDS

October 11, 2011

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

RE: Proposal 35 & 36 for aerial wolf control on the Kenai Peninsula

To Whom it May Concern:

This letter is in response to the proposed aerial wolf control program for the Kenai Peninsula (15A and 15C). We are very much opposed to these proposals, and do not see how aerial killing of wolves could be a viable solution to the problem of declining moose populations.

Wolves in the wild are valuable too. Coming from California where **all** wolves have been wiped out, seeing a wolf in the wild in Alaska was a wonderful wildlife viewing opportunity, even more exciting than seeing a moose. What excites me, and many people who come to Alaska to visit or live is the wildness of it and the fact that such a variety of animals still exist here. Protecting the moose for wildlife viewing and hunting is only part of the picture. Round up some moose and put them in a park where they can be safe, but don't make all our public land into a moose farm. Learn from the mistakes made in the lower 48. Having wolves in the wild is one of the things that makes Alaska special. It is better to have a balanced ecosystem with natural predators and prey than to 'manage' it since such manipulation can have unintended consequences.

There is just not enough information to determine that killing wolves will solve the problem. Is there a recent study that shows how many wolves are in the Kenai Peninsula? Our local paper said there has NEVER been a study of wolf numbers here in 15C. The last study on the effect of predators on moose on the Kenai was done in 1977-78 which showed that 34 percent of the calves that died were killed by black bears, with 6 percent killed by brown bears and 6 percent killed by wolves. Even this dated study didn't show that wolves were the biggest problem. 6 percent isn't enough to justify the expense, the potential disruption to people recreating in areas where the shooting will take place, and removing wolves from the ecosystem.

It is very likely that the increase in people has led to the decrease in moose numbers. More people in the area means less habitat, more moose killed on the road, more people hunting, and more poaching. In the past year, we have heard of two incidents in our little neighborhood where young moose were killed illegally. What about having more enforcement officers to control poaching? I read that fewer fires (because of fire suppression) has led to less moose habitat. What about having controlled burns to provide more habitat?



Shooting wolves by helicopter sounds like a barbaric and unscientific solution to the problem. Unbiased scientific studies are warranted before taking action, and I bet they will show that killing off wolves isn't the best solution.

Sincerely,

Michele Cornelius Gene Cornelius

Michele & Gene Cornelius



1968 to Present

RECEIVED
OCT 14 2011
BOARDS

Fish & Game Board

As for Wolf control, I think you need to give trappers a bounty on wolfs. For the amount of time and money they put into it they get more money by cutting off their heads & feet & tails. Also that would eliminate the plane hunting and that would get most of the tree huggers off your backs.

The predators have no predators story is about me. If any of you would like to see for yourself. Get in touch with me William E Bunch

35776 Marshall Dr
Soldotna AK 99669

We need to have something done with the Bears. For the last 10 years every moose we have killed if it was left in the field over night the bears had it. Once even 4 hours. I have watched them from 3 miles gone in on one we killed and it snuffed its way in 3 hours to the kill. We need ~~the~~ Unit 15 split into A B & C instead of all the subunits all in one.

Please do something
William E Bunch



Letters to the Editor

Wolf control on the Kenai overdue

In response to the letters in the Oct. 4 Clarion sent in by Jerry Brookman and Jeanne Schaaf regarding wolf control on the Kenai Peninsula, I disagree. I've been trapping on the Kenai dating back to 1962. During these 60 years I feel I have witnessed more than any employee of the U.S. Fish and Wildlife Service, past and present of the Kenai National Wildlife Refuge. 95 percent of the general public would not believe what I have encountered on my traplines these past 60 years. Today on the Kenai there is an estimate of 300 plus wolves, each wolf kills on the average of 5 to 7 moose per year. The moose and caribou that these wolves take down on any given year far exceed what is harvested by hunters or killed on our highways. Not only do I agree, but I also requested to have wolf control on the Kenai. The Kenai not only needs a wolf control program but it is long overdue.

**Roger Tachik
Soldotna**

Vote for tax exemption is not a vote against school funding

On Tuesday the voters clearly stated they did not wish to repeal the nine month sales tax exemption on non-prepared food items by voting No on Proposition 1. This vote is understandable given the high prices at the grocery stores and the difficulty in many households to stretch the ever shrinking budget. Since sales taxes are required by borough code to be used for our borough schools, one could perhaps mistakenly make the argument the community does not support our local public schools. I say mistakenly because even though Prop 1 failed, I do not believe this is true. I believe our peninsula community does support our public schools. Parents entrust our over 600 certificated teachers each and every day to provide a quality learning experience for their children. Educational professionals around the world agree that a successful education system has many facets including a strong curriculum, ex-

perienced teachers, willing students, adequate resources, and a community which values education. I am proud to be part of this community, a community that I know values education. Please continue to support our schools, our teachers, and our students.

**LaDawn Druce
President, Kenai Peninsula
Education Association**

Sturman has history of speaking up for the people

I am pleased to see Fred Sturman has entered the contest for Borough Mayor, and has been selected to be in the Run-off for that position. I think it is important that everyone be aware that Fred was very involved and active in the effort to get a vote on whether the people of our state should get a dividend check from our permanent fund, rather than the entire permanent fund be used for government. He worked hard to get signatures required for that vote that resulted in 83% voting to let the people of Alaska benefit from that yearly check.

Thank you Fred! I know Fred would make a good and caring Borough Mayor.
Good Luck Fred!

**Ed Martin Sr.
Sterling**

Predators have no predators

Something which is very difficult for me to understand is that people do not know what a predator animal is. Also that a predator animals like bears and wolves have no other animal that kills them. Going back in time, like 70 years ago, we didn't have so many people interfering with the management of animals that were destroying a persons possessions, like livestock, fowl or any animal they made a living off of. We hunted till they were thinned out.

I have some statistics from a 20-day hunt for moose in the Caribou Hills this 1911 hunting season — statistics you won't get anywhere else. This is from a good hunting friend of mine who I spent 8 years hunting with in the 1980s till my health would not let me continue. I spent many hours in the spotting shack from be-

fore daylight till dark in the evening with these hunting friends. I know how our count of animals was done on a daily basis and checked the count sheet. He has had a camp and hunted this same area for 43 years. This year they spotted 300 cows and some of these would be the same ones each day. But the worst stat of all was only three calves with these cows, and 20 bulls with none of them being of the legal size. Black bears, 13 and brown bears, 23. On one occasion, without moving the spotting scope, they saw 7 brown bears. The 8 years I spent up there the only time we saw more than 1 brown bear was when a sow had three cubs. Can anyone understand that just changing the bulls that you hunt will not change anything untill there is a major hunt of the brown and black bear in this area and talking to another hunter who went north towards Denali, came back with no moose, but 1 black bear and 1 brown bear and the one legal moose he spotted when he went after it, there was a huge brown bear between himself and the moose.

Every since moving to Kenai, 35 years ago, we always had a cow bring her baby calf around our house and the apartments we managed had 1 or 2 cows that hung around because they felt safe there. This year our cow that hung around the apartment we now live in, each year she has had a calf, but this year didn't return. When you have to kill 8 foot bears in the city limits of Soldotna, there will never be any more calves in your yard.

**Paul D. Morrison
Kenai**

Applause

Thanks for helping Falcons fly

The families of Pop Warner's Kenai Falcons would like to express our heartfelt gratitude to the coaches: Layne Guigler, Gus Sandahl. And Al Fields and Team Moms Lysa Diorec and Heidi Vann. The time, energy and effort they have put into this season and the investment they made into our sons' lives has been greatly valued. This is yet another example of the Kenai community supporting their youth.



P.O. Box 2994
Homer, AK 99603

October 16, 2011

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

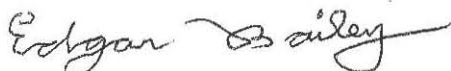
Dear Board Members:

Once again the Alaska Board of Game is considering the use of aircraft to kill wolves to artificially boost moose numbers for hunters (Proposals 35 and 36). Under the guise of "Intensive Management Plans" aerial wolf control on the Kenai Peninsula is sought (GMU 15 A & C). ADF&G's own biologists indicate that habitat issues are the real reason for low moose numbers in 15 A. Moose flourished after major fires like the huge 1969 burn. If poor quality and quantity of browse are the main factors for the downward trend in moose, there is no justification for killing wolves or bears, except to placate hunters. With increasing numbers of humans settling and/or recreating on the Kenai Peninsula, there are simply not enough moose to go around, especially with declining carrying capacity and instances of overhunting like taking too many bulls in 15C.

Sadly, the current paradigm for ADF&G and the Board, as espoused by the department's director, is managing for abundance. This largely ignores wildlife diversity and the roughly 80% of Alaskans who do not hunt or trap.

I urge the Board to not disregard the "big picture" and therefore not authorize the use of aircraft to shoot wolves, particularly on the Kenai Peninsula, where a negative public response will ensue.

Sincerely,



Edgar Bailey



F&G

10.14.11



Ms. Lydia Garvey
429 S 24th St.
Clinton, OK 73601

Comments ^{re} Proposals 35/36:

Nix general wolf hunting 'on the Kenai'!

What ~~kind~~ of cowardly 'hunting' is this anyway? Hey, how about doing a 'wolf' census! Where is the Respect for nature's sentient species? Perhaps low moose #'s are due to nutritional stress & overharvest ~~for~~ humans & 100's of moose killed yearly on the Sterling Highway!

Wolves are vital to ecosystem balance. Do your job - Protect Our Public lands, waters, wildlife & health!

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

Thank you,

Lydia Public Health Nurse

P.S. Get ~~with~~ the 21st Century & allow promote (E-mail comments,)



001 07 2011

BOARDS

October 4, 2011

Austin Ahmasuk
P.O. Box 693
Nome, AK 99762

Alaska Board of Game
(907) 465-6094 (FAXED)

Cora Campbell, Commissioner
Alaska Department of Fish and Game
P.O. Box 115526
1255 W. 8th Street
Juneau, AK 99811-5526
(907) 465-2332

**RE: Muskox Trophy Destruction, Deferred Proposal #223, Spring 2011
Muskox Management changes
GMU 22, Comments**

Dear ADF&G Commissioner & Alaska Board of Game,

My name is Austin Ahmasuk I am a resident of Nome, Alaska and wish to make comment to the Alaska Board of Game (BOG) in regards to the deferred action on Proposal #223 which deferred the action on Muskox trophy destruction from the Spring 2011 BOG meeting to the Fall 2011 BOG meeting taking place in Barrow.

I may not be able to attend the meeting in Barrow and wish to make comment now so that your office and staff may be informed of local opinion. I hope and pray this comment letter is in good order and will be received accordingly for inclusion in the public record.

MUSK OX

I wish to reference my letter of February 15, 2011 to the BOG in comment to proposal #223 from the Spring 2011 BOG meeting. I have reviewed the audio for the Spring 2011 BOG meeting and also reviewed a powerpoint presentation given to the BOG and understand that the BOG is considering significant changes to musk ox management and I am concerned about the potential changes. The ADF&G presented a powerpoint to the BOG which may have helped the board make its decision to defer action and dramatically alter the original proposal.

The BOG is now considering segregating the harvestable surplus of the musk ox population into a trophy segment and subsistence segment in order to address the perceived notion that doing so will reconcile problems amongst the various user groups. The vast majority of the hunting public that I have spoken to favors trophy destruction. Additionally, local subsistence users are becoming growingly disturbed by how the



musk ox hunt has changed since the BOG opened the first season. It is as if the BOG is unsympathetic to local uses and local users. It is my opinion that local users should become the primary beneficiary of local resources.

The original proposal would have proposed changes to **5AAC 92.052**. If the BOG is considering changes to musk ox management as I have noted it would be considering changes to **5AAC 85.050**. That being the case I believe the proposal now generated from Proposal #223 flies in the face of public involvement and frustrates the public trust. The original proposal is vastly different from the options now being considered and I believe it is not a good exercise of the public trust given to the BOG to make such dramatic changes to Proposal #223. The wording of a proposal to change muskox management has not been fully fleshed out with the public or given the proper consideration by an ANS discussion. If a proposal to change muskox management resulted from the light debate in proposal #223, I am convinced that is not the public's will. The BOG's intention with BOG Proposal #223 was to gather comment about trophy destruction and from the limited debate and comment it received regarding the issue it is now generating an entirely different proposal that would change 5AAC 85.050. Had the BOG developed the proposal as it is presently worded, it would have generated significant debate and concern.

I believe the BOG's proposal to drastically alter musk ox management will cause an even greater rift between user groups. I believe the public's trust has been compromised because the BOG is considering changes that it has not gathered the appropriate public record from which to draw upon to make a new ANS determination. I believe the Administrative Procedures Act governs BOG proposal making authority, when it considers changes to game regulations that affect AS 16.05.258, which should have guided the BOG to make more efforts to inform the public.

Sec. 44.62.312. State policy regarding meetings.

(a) It is the policy of the state that

(1) the governmental units mentioned in AS 44.62.310 (a) exist to aid in the conduct of the people's business;

(2) it is the intent of the law that actions of those units be taken openly and that their deliberations be conducted openly;

(3) the people of this state do not yield their sovereignty to the agencies that serve them;

(4) the people, in delegating authority, do not give their public servants the right to decide what is good for the people to know and what is not good for them to know;

(5) the people's right to remain informed shall be protected so that they may retain control over the instruments they have created;

(6) the use of teleconferencing under this chapter is for the convenience of the parties, the public, and the governmental units conducting the meetings.

(b) AS 44.62.310 (c) and (d) shall be construed narrowly in order to effectuate the policy stated in (a) of this section and to avoid exemptions from open meeting requirements and unnecessary executive sessions.

I do not believe the limited discussion and deferment of BOG proposal #223 from the Spring 2011 meeting is adequate material for the BOG to consider changes to musk ox management unless it is the policy of the BOG to dramatically, alter its position at whim.



It appears the BOG is taking extraordinary steps to change musk ox management that has not been properly vetted in the guise of a deferred proposal that considered changes to trophy destruction requirements and was not a proposal to musk ox management. Had the public known of a proposal to change musk ox management to create two distinct population segments then I believe there would have been significant debate.

I also place a significant amount of fault upon the ADF&G for not vetting the issue properly. ADF&G put out a survey to GMU 22 communities on the proposal deferment, citing the BOG's idea to change musk ox management, as a result of its powerpoint presentation to the BOG in Spring 2011. ADF&G should have put out the survey prior to its powerpoint presentation not months after the fact. AS 16.05.094 requires the Division of Subsistence to compile subsistence data, present info to the public and BOG, and participate with other divisions on all aspects of subsistence hunting. ADF&G government to government policy dated May 1, 2002 requires ADF&G to engage tribes in a meaningful manner. The musk ox proposal deferment should have been fully vetted with tribes and Alaska Native Organizations since its implications are far reaching.

By copy of this letter to the Commissioner I urge the Commissioner to review the information exchange that took place at the Spring 2011 BOG meeting and to lessen the public frustration of deferred proposal #223.

I urge the BOG and ADF&G Commissioner to lend a strong ear to the concerns of local people when it considers changes to GMU 22 musk ox management. GMU 22 residents have worked long and hard to conserve musk ox populations and provide for hunting opportunity. Of late that opportunity has become highly regulated and in some years only lasts days before becoming closed by emergency order. Musk ox is an excellent resource that provides easily obtainable meat.

BROWN BEAR

In regards to brown bear management I urge the BOG to adopt proposals 24 thru 26, or a variation on the themes proposed. Brown bear populations are healthy, and local hunters will benefit from being able to harvest from a bear population that by local opinion are healthy. Local persons of various persuasion proposed ideas very similar to those in proposals 24-26 over the years. It is my opinion people who hunt bear in GMU 22C are frustrated by the lack of continuity of regulation. Bears which inhabit the border regions of the sub-units may be harvested in any event as they travel in and out the sub-unit boundaries.

In regards to Brown Bear Tag Fee exemptions I urge the BOG to adopt the tag fee exemption.

PTARMIGAN

In regards to Proposal #27, the BOG has no authority to make changes to the Federally managed subsistence season. The Federal season (50 CFR Part 92) for non-waterfowl



opens August 20 and is fully adequate to provide for the subsistence harvest of birds. Proposals for the prohibited season should be made to the Alaska Migratory Bird Co-Management Council (AMBCC).

CONCLUSION

I am a lifelong subsistence hunter. Many of my Alaska Native fishing and hunting traditions are prohibited or illegal. The compounding losses of my culture through the actions of the BOF and BOG is disheartening. The BOF and BOG are responsible for a tremendous amount of loss in regards to the fishing and hunting traditions of Alaska Natives. In our desire to ensure our cultural lifestyle we make strong efforts to be advocates only to see our efforts unrealized. Strong sport hunting interests contrast with the local livelihood.

I feel as though our traditions are treated with little regard, as is evident from the potentially disastrous deferment of Spring BOG proposal #223. AS 16.05.258 requires the BOG to make the specific identifications in that subsection of Alaskan Statute when it proposes to do what it is now proposing for musk ox management. It is also my understanding that a fully vetted ANS determination should be made available for public comment as a result of the proposal. To date there has been no such ANS discussion developed by the Alaska Division of Subsistence. The BOG has made a subsistence determination for musk ox in GMU 22 and AS 16.05.258 requires the BOG to ensure that subsistence is protected. The BOG's musk ox proposal will impact the 8 criterion under the Customary and Traditional Use Determinations and must be addressed as required by 5 AAC 99.010.

Thank you for your time and consideration.

Sincerely,



Austin Ahmasuk



October 16, 2011

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

TO: Members of the Alaska Board of Game:

The Kachemak Bay Conservation Society (KBCS) is a 501c3 committed to the conservation of natural resources in the Kachemak Bay region. The current recommendation by the Board of Game to implement an aerial wolf hunting program by the Alaska Department of Fish and Game is opposed by the members of KBCS. The reasons for opposition are listed below:

1. Scientific research indicates that low moose populations are the result of a lack of browse caused by poor habitat. The poor habitat has been created by the lack of fire which creates an environmentally unsustainable environment for moose browse resulting in starvation.
2. The process for including the public in this decision is severely lacking. The public hearing to review the plan is going to be held in Barrow making it extremely difficult for local citizens to attend and comment.
3. The other reasons for low moose numbers are not being addressed. These include moose/motor vehicle collisions and over hunting and poaching of moose.
4. Alaska Department of Fish and Game have no accurate data as to the total number of wolves located on the Kenai Peninsula. Why would the Board of Game make such a recommendation when there are no accurate data?

Aerial wolf control is highly visible and controversial. KBCS urges the Alaska Department of Fish and Game and the Board of Game to approach this issue using strong biological facts. KBCS is committed to maintaining biodiversity on the Kenai Peninsula. Wolves are an important piece of this biodiversity and a healthy ecosystem.

Sincerely,

Roberta Highland
President KBCS



RECEIVED
OCT 24 2011
BOARDS

To whom it may concern,

I am writing this in regards to your proposed aerial wolf predator control hunt in game unit 15. As an avid moose hunter in GMU 15 and as Alaskan citizen. I am opposed to this hunt. There are other factors that have lead up to the decline of moose populations on the Kenai Peninsula beside predation by wolves. As your biologist have stated, habitat and browse being the most significant factor. And have the numbers of moose killed by cars on the Sterling Highway been taken it to account? Maybe we should have an aerial hunt for them?

If the biologist "the experts" said that wolves are killing all or the biggest majority of moose then I would be more in support of doing predator control to bring a balance to the population on the peninsula. As it stands and my understanding of the facts is that humans and lack of fires are the biggest reason for the decline of moose populations.

I would also like to know why you as a board feel it is so important to wipe out a small population of wolves on the Kenai Peninsula? When historically humans have all ready done that here and in others parts of the US. Shouldn't the board be looking at the facts and using those facts manage the entire ecosystem to the benefit of all the game animals and the hunters?

Thank you for you time and I hope you make a sound judgment on the facts,



Buck Curry
A concerned taxpayer, citizen, avid hunter and fisherman
PO Box 2414
Homer, Ak 99603



BOARDS
OCT 21 2011
RECEIVED

Scott P Miller
PO Box 2457
Homer, AK 99603

Alaska Board of Game

Sirs:

I'm writing today to strongly oppose implementation of proposal 35-36 allowing aerial wolf hunting as a solution to declining moose populations.

Studies, including one in Denali National Park, have shown that wolf predation actually strengthens moose populations. Killing wolves will not result in more moose.

Habitat loss due to human development, climate change, or from other causes is much more likely to affect moose populations yet your solution is to kill wolves. Wolves and moose have coexisted successfully for thousands of years without human intervention.

Your attitude toward wolves is positively medieval. If you were to ask people who live here on the peninsula I think you would find that most people oppose this terrible proposal.

Wolves are part of the natural world and the board of game's irrational hatred of these animals should not direct policy. Your plan would leave 15 wolves on the peninsula. That is a crime against the Kenai Peninsula, the state of Alaska and the world.

Please abandon this proposal.



Scott P. Miller



Letter to Board of Game Oct. 26, 2011 (To post in Book on Proposals 35 and 36)

As a Kenai Peninsula Resident I am very concerned about proposals 35 and 36. Any proposal that impacts our wildlife must use the best available science to back it up, and proposals 35 and 36 do not.

These proposals are in direct conflict with the studies and data collected by the ADF&G resident biologists in the areas of Units 15A and 15C.

State of Alaska highway signs posted on the Kenai Peninsula state there were 252 moose killed on the highways July 1, 2010 to July 1 2011

That is pretty amazing since there are only about 260 miles of state highway on the peninsula.

A 1995 Report by the Ak. Dept. of Transportation addressed the issues of moose/ vehicle accidents on Ak. rural roads and their objectives were to identify areas of high moose/ vehicle collisions and increase mitigation efforts and look for other possible solutions.

I have lived in Homer for 21 yrs. and have seen some of these solutions enacted by state DOT but my question is if the number of moose/vehicle collisions is high on the Kenai Peninsula what more can be done?

I own property outside of Homer since 1989. Every year I reported illegal moose hunting to the state Troopers and no one was ever charged. The last moose killed illegally on my property was a baby moose calf shot in the neck in the summer, which I did report and it was investigated and that was it. I built my house in 2002 and that stopped the annual poaching of moose on my property.

There is no doubt there is a need for more law enforcement of state game laws.

The moose population issues are not new. Increases in human populations and activities, a major highway that divides moose habitat, an annual high rate of moose/ vehicle collisions, habitat loss leading to decreases in food supplies and hunting illegally or out of season should be addressed before the state takes action to kill a non- invasive species to Alaska, the wolf.

Patricia Mayhan

Box 2387 Homer, Ak. 99603



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

I **OPPOSE** BOG proposals 35 and 36 would implement aerial wolf control in Game Management Units 15A and 15C

Why?

- **Wolves are not the problem.** The Alaska Department of Fish & Game's own evidence presented to the BOG in March concluded that predation was not the cause of declining moose populations on the Kenai. So why target wolves?

In 15A, the ADF&G's own data concluded that poor habitat is responsible for fewer moose. So why target wolves?

In addition, much of Unit 15A is within the Kenai National Wildlife Refuge, federally managed land that is off-limits to Alaska's predator control programs. Targeting wolves in the remaining area would be inefficient and at best unlikely to affect moose populations.

In Unit 15C, according to the ADF&G's own analysis, moose populations are not declining. A cited low bull-to-cow ratio cannot be traced to wolf predation, and killing wolves does not negate hunters' prior overharvest of bull moose.

- **Aerial wolf killing will be highly visible, controversial, and is not an appropriate action** in an area that is heavily populated and a year-round recreation destination.
- **In both units aerial predator control is simply not practical.** Forested terrain makes tracking and shooting the wolves difficult. Landing a plane, in order to salvage a carcass or dispatch a wounded animal, is problematic and dangerous.
- **Any private citizen with a permit – not trained ADF&G biologists - will be allowed to shoot wolves from aircraft.**
- **Public input on the proposals will be severely limited.** The BOG directed ADF&G to formulate aerial wolf control plans at its March 2011 meeting, but the plans were only very recently published for public review. Further inhibiting public participation, the proposals will be



discussed and voted on at the BOG's meeting in Barrow, one of Alaska's most remote and difficult-to-access cities. People from the Kenai and Southcentral Alaska – those directly affected by the proposals – will have virtually no opportunity for in-person input.

We ask that the BOG to postpone action on the proposals until its January meeting in Anchorage, when residents directly affected by the measures would have a fair opportunity to have their voices heard

Sincerely
Kathy Henley
Lafayette, CO





United States Department of the Interior

FISH AND WILDLIFE SERVICE
Yukon Delta National Wildlife Refuge
P.O. Box 346
Bethel, Alaska 99559



ATTN: Board of Game Comments
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115562
Juneau, AK 99811-5526

The Yukon Delta National Wildlife Refuge (Refuge) submits the following comments on proposals 7 and 8, both of which address changes to moose harvest seasons and bag limits in the Yukon portion of Unit 18. The Refuge submitted two similar proposals to the Federal Subsistence Board, 12-48 and 12-49, (attached). While similar, the proposals contain some key differences which are discussed below. In the opinion of the Refuge, aligning the two proposals to the greatest extent possible will assist subsistence users throughout the region. Similarly, the Yukon-Kuskokwim Delta Subsistence Regional Advisory Council voted to support the Refuge proposals at their September 29th, 2011 meeting in Bethel.

Proposal 7 - Lower Yukon Moose

Proposal 7 closely matches proposal 12-49 with one key difference. In proposal 12-49, submitted to the Federal Subsistence Board, the Refuge proposed a 2-moose limit from August 1 to the last day of February, in which only 1 may be an antlered moose from Sept 1 – Sept 30. In contrast, proposal 7 proposes a 2-moose limit from August 1 to the last day of February, in which only 1 may be an antlered moose (which could be harvested during any part of the season), and a person may not take a cow accompanied by a calf prior to October 1st. The key difference is that proposal 7 allows an antlered bull to be harvested during any part of the seven-month season, instead of just during a portion of the season. The Refuge believes that allowing antlered bull hunting after the month of September will potentially allow increased bull harvest during near-peak rut timing (early October) in a population that is near 30 bulls:100 cows (2010 data). The Refuge believes that liberalizing the cow harvest is the best strategy to reduce herd growth and potential habitat degradation, at this time. Finally, to benefit hunters the Refuge supports having consistency between the State and Federal regulations to minimize confusion and harvest reporting requirements.

Proposal 8 – Remainder Unit 18 (Middle Yukon) Moose

The Refuge is concerned over the differences between proposal 8, submitted by ADFG to the Alaska Board of Game and Proposal 12-48, submitted by the Refuge to the Federal Subsistence Board. Both proposals propose a change to the harvest limit from 1 antlered bull to 1 moose during the winter season. However, the Federal proposal requests extension of the winter season from January 10 to the last day of February whereas the State proposal requests that the winter season extend from January 10 to the last day of January. The Refuge would prefer that the proposed State season align with the proposed Federal season, which would provide consistency and would allow more opportunity for hunters. For the past two years (2009 and 2010) both the State and Federal Subsistence Board extended the winter season to February 28th through Emergency Order and Special Action, respectively.

Thank you for your consideration.

Patrick Snow

Acting for Gene Peltola Jr., Yukon Delta National Wildlife Refuge Manager

cc: USFWS OSM, USFWS Regional Office, Bethel ADF&G

Attachments: OSM Proposal Analysis 12-48, 12-49.



WP12-45/49 Executive Summary

General Description	<p>Proposal WP12-45 requests that for a portion of Unit 18, the start of the fall hunting season be moved from Aug. 10 to Sept. 1, and that the harvest limit be modified from one antlered bull to one moose, except that a cow with a calf may not be taken. <i>Submitted by Aloysius Unok of Kotlik</i></p> <p>Proposal WP12-49 requests the moose hunting season in Unit 18, that portion north and west of the Kashunak River including the north bank from the mouth of the river upstream to the old village of Chakaktolik, west of a line from Chakaktolik to Mountain Village and excluding all Yukon River drainages upriver from Mountain Village be revised from fall and winter dates (Aug. 10 – Sept.30 and Dec. 20 – Feb. 28) to Aug. 1 through the last day of February. The harvest limit would be two moose, only one of which may be antlered. The harvest of an antlered bull would be limited to the dates of Sept. 1 – 30. <i>Submitted by the Yukon Delta National Wildlife Refuge</i></p>
Proposed Regulation	<p>WP-45</p> <p>Unit 18 — Moose</p> <p><i>Unit 18 — that portion north and west of the Kashunuk River including the north bank from the mouth of the river upstream to the old village of Chakaktolik, west of a line from Chakaktolik to Mountain Village and excluding all Yukon River drainages upriver from Mountain Village – 1 antlered bull 1 moose except a cow with calf may not be taken.</i></p> <p><i>Unit 18 — that portion north and west of the Kashunuk River including the north bank from the mouth of the river upstream to the old village of Chakaktolik, west of a line from Chakaktolik to Mountain Village and excluding all Yukon River drainages upriver from Mountain Village – 1 moose. If 1 antlered bull is taken during the fall season in this area, 1 additional moose may be taken during the winter season. If no moose are taken in the fall season, 2 moose may be taken in the winter season. No more than 2 moose may be harvested in this area in a regulatory year. A Federal registration permit is required. The Yukon Delta NWR Manager may restrict the harvest in the winter season to only 1 antlered bull or only 1 moose per regulatory year after consultation with the ADF&G and the Yukon-Kuskokwim Delta Subsistence Regional Advisory Council chair.</i></p>

continued on next page



WP12-45/49 Executive Summary (continued)

Proposed Regulation	<p>WP-49</p> <p>Unit 18 — Moose</p> <p><i>Unit 18 – that portion north and west of the Kashunuk River including the north bank from the mouth of the river upstream to the old village of Chakaktolik, west of a line from Chakaktolik to Mountain Village and excluding all Yukon River drainages upriver from Mountain Village – 1 antlered bull 2 moose, only one of which may be antlered. Antlered bulls may only be harvested from Sept 1 – Sept 30.</i></p> <p><i>Unit 18 – that portion north and west of the Kashunuk River including the north bank from the mouth of the river upstream to the old village of Chakaktolik, west of a line from Chakaktolik to Mountain Village and excluding all Yukon River drainages upriver from Mountain Village – 1 moose. If 1 antlered bull is taken during the fall season in this area, 1 additional moose may be taken during the winter season. If no moose are taken in the fall season, 2 moose may be taken in the winter season. No more than 2 moose may be harvested in this area in a regulatory year. A Federal registration permit is required. The Yukon-Delta NWR Manager may restrict the harvest in the winter season to only 1 antlered bull or only 1 moose per regulatory year after consultation with the ADF&G and the Yukon-Kuskokwim Delta Subsistence Regional Advisory Council chair.</i></p>
	<p><i>Aug. 10 – Sept. 30</i> <i>Aug. 1 – the last day of February</i></p> <p><i>Dec. 20 – Feb. 28</i></p>
OSM Preliminary Conclusion	<p>Support Proposal WP12-49.</p> <p>Take no action on Proposal WP12-45.</p>
Yukon/Kuskokwim Delta Regional Council Recommendation	
Western Interior Regional Council Recommendation	
Seward Peninsula Regional Council Recommendation	
Interagency Staff Committee Comments	
ADF&G Comments	
Written Public Comments	None



DRAFT STAFF ANALYSIS WP12-45/49

ISSUES

Proposal WP12-45, submitted by Aloysius Unok of Kotlik, requests that for a portion of Unit 18, the start of the fall hunting season be moved from Aug. 10 to Sept. 1, and that the harvest limit be modified from one antlered bull to one moose, except that a cow with a calf may not be taken.

Proposal WP12-49, submitted by the Yukon Delta National Wildlife Refuge, requests the moose hunting season in Unit 18, that portion north and west of the Kashunak River including the north bank from the mouth of the river upstream to the old village of Chakaktolik, west of a line from Chakaktolik to Mountain Village and excluding all Yukon River drainages upriver from Mountain Village be revised from fall and winter dates (Aug. 10 – Sept.30 and Dec. 20 – Feb. 28) to Aug. 1 through the last day of February. The harvest limit would be two moose, only one of which may be antlered. The harvest of an antlered bull would be limited to the dates of Sept. 1 – 30.

DISCUSSION

The proponent for Proposal WP12-45 states that hunting opportunities for local users are limited in Unit 18 by the antlered bull restriction during the fall hunting season. The proponent states that hunters have to spend a long time in the field searching for a legal animal to harvest and by allowing a 1 moose harvest limit, there would be more harvest opportunities.

The proponent for Proposal WP12-49 states that the moose population of the lower Yukon has grown dramatically and the season and harvest limit for this portion of Unit 18 can be liberalized. This proposal would increase hunting opportunities for Federally qualified subsistence users by increasing the opportunity to harvest cows and harvest two moose during the fall. Reducing the number of cows may help slow the increase in the population, thereby reducing habitat damage that could lead to a population crash.

Existing Federal Regulation

Unit 18 — Moose

<p><i>Unit 18 — that portion north and west of the Kashunak River including the north bank from the mouth of the river upstream to the old village of Chakaktolik, west of a line from Chakaktolik to Mountain Village and excluding all Yukon River drainages upriver from Mountain Village – 1 antlered bull</i></p>	<p><i>Aug. 10 – Sept. 30</i></p>
--	----------------------------------

Unit 18 — that portion north and west of the Kashunuk River including the north bank from the mouth of the river upstream to the old village of Chakaktolik, west of a line from Chakaktolik to Mountain Village and excluding all Yukon River drainages upriver from Mountain Village— 1 moose. If 1 antlered bull is taken during the fall season in this area, 1 additional moose may be taken during the winter season. If no moose are taken in the fall season, 2 moose may be taken in the winter season. No more than 2 moose may be harvested in this area in a regulatory year. A Federal registration permit is required. The Yukon Delta NWR Manager may restrict the harvest in the winter season to only 1 antlered bull or only 1 moose per regulatory year after consultation with the ADF&G and the Yukon-Kuskokwim Delta Subsistence Regional Advisory Council chair.

Dec. 20 – Feb. 28

Proposed Federal Regulation

WP-45

Unit 18 — Moose

Unit 18 — that portion north and west of the Kashunuk River including the north bank from the mouth of the river upstream to the old village of Chakaktolik, west of a line from Chakaktolik to Mountain Village and excluding all Yukon River drainages upriver from Mountain Village – ~~1 antlered bull~~ 1 moose except a cow with calf may not be taken.

***Sept. 1** ~~Aug. 10~~ – Sept. 30*

Unit 18 — that portion north and west of the Kashunuk River including the north bank from the mouth of the river upstream to the old village of Chakaktolik, west of a line from Chakaktolik to Mountain Village and excluding all Yukon River drainages upriver from Mountain Village – 1 moose. If 1 antlered bull is taken during the fall season in this area, 1 additional moose may be taken during the winter season. If no moose are taken in the fall season, 2 moose may be taken in the winter season. No more than 2 moose may be harvested in this area in a regulatory year. A Federal registration permit is required. The Yukon Delta NWR Manager may restrict the harvest in the winter season to only 1 antlered bull or only 1 moose per regulatory year after consultation with the ADF&G and the Yukon-Kuskokwim Delta Subsistence Regional Advisory Council chair.

Dec. 20 – Feb. 28



WP-49

Unit 18 — Moose

Unit 18 – that portion north and west of the Kashunuk River including the north bank from the mouth of the river upstream to the old village of Chakaktolik, west of a line from Chakaktolik to Mountain Village and excluding all Yukon River drainages upriver from Mountain Village – ~~1 antlered bull~~ 2 moose, only one of which may be antlered. Antlered bulls may only be harvested from Sept 1 – Sept 30.

~~Aug. 10 – Sept. 30~~
Aug. 1 – the last day of February

~~Unit 18 – that portion north and west of the Kashunuk River including the north bank from the mouth of the river upstream to the old village of Chakaktolik, west of a line from Chakaktolik to Mountain Village and excluding all Yukon River drainages upriver from Mountain Village – 1 moose. If 1 antlered bull is taken during the fall season in this area, 1 additional moose may be taken during the winter season. If no moose are taken in the fall season, 2 moose may be taken in the winter season. No more than 2 moose may be harvested in this area in a regulatory year. A Federal registration permit is required. The Yukon Delta NWR Manager may restrict the harvest in the winter season to only 1 antlered bull or only 1 moose per regulatory year after consultation with the ADF&G and the Yukon-Kuskokwim Delta Subsistence Regional Advisory Council chair.~~

~~Dec. 20 – Feb. 28~~

Existing State Regulation**Unit 18 — Moose**

Residents, one antlered bull
OR

Aug. 10 – Sept. 30

One moose

Dec. 20 – Feb. 28

One antlered bull for nonresidents

Sept. 1 – Sept. 30

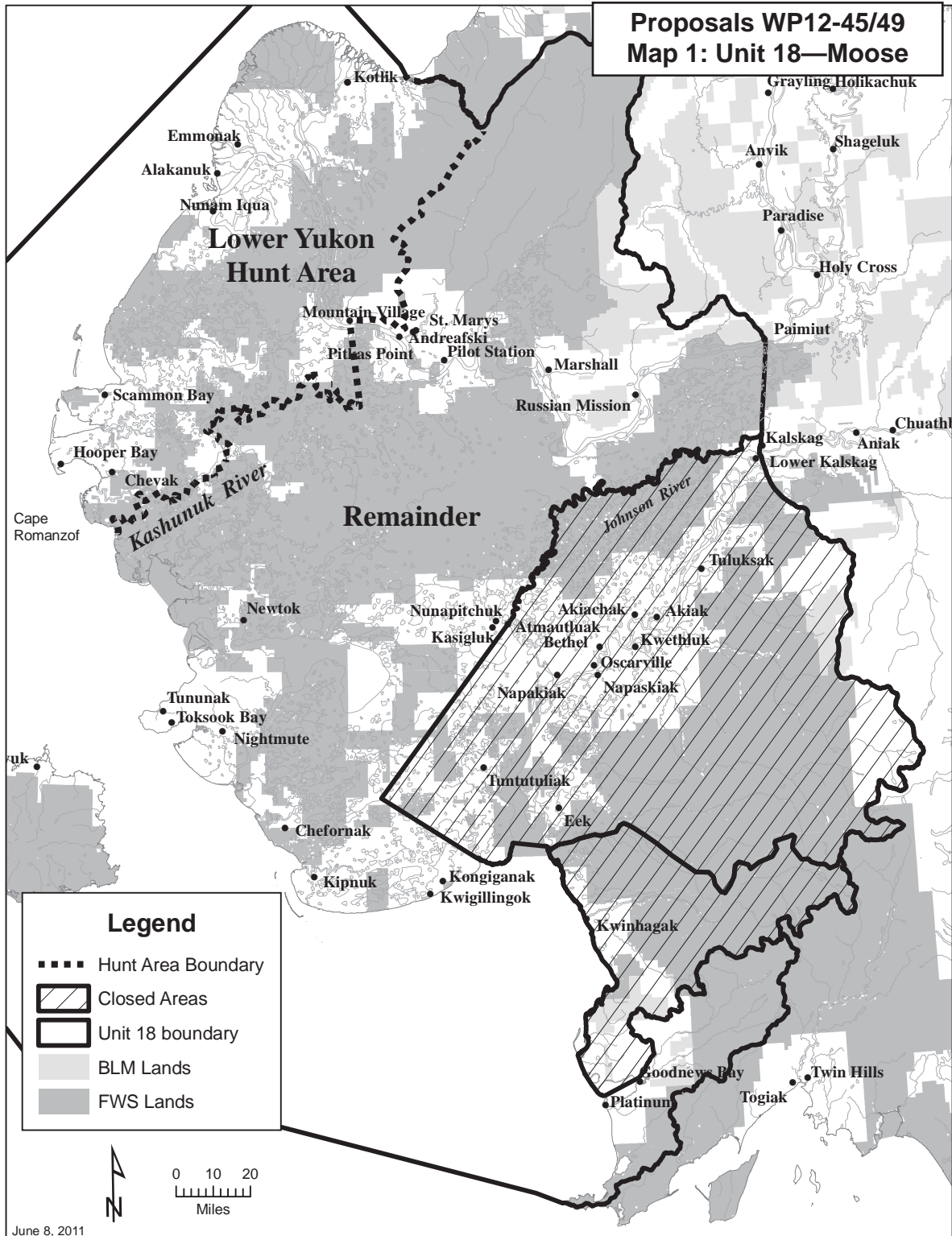
Extent of Federal Public Lands

Federal public lands comprise approximately 64% of Unit 18 and consist of 62% US Fish and Wildlife Service managed lands and 2% Bureau of Land Management managed lands (**Map 1**).

Customary and Traditional Use Determinations

Rural residents of Unit 18, Upper Kalskag, Aniak and Chuathbaluk have a positive customary and traditional determination for moose in Unit 18, that portion of the Yukon River drainage upstream of Russian Mission and that portion of the Kuskokwim River drainage upstream (but excluding) the Tuluksak drainage.

Rural residents of Unit 18, St. Michael, Stebbins, and Upper Kalskag have a positive customary and traditional determination for moose in Unit 18, that portion north of a line from Cape Romanzof to



Kuzilvak Mountain to Mountain Village, and all drainages north of the Yukon River downstream from Marshall.

Rural residents of Unit 18 and Upper Kalskag have a positive customary and traditional determination for moose in Unit 18 remainder.

Regulatory History

In November 2005, the Alaska Board of Game adopted State Proposal 04 in response to the rapid growth of the lower Yukon moose population. Action taken on the proposal modified the State harvest limit by allowing the harvest of antlered bulls only and established a winter season for antlered bulls and calves. During its November 2007 meeting, the Alaska Board of Game lengthened the fall moose season for the lower Yukon and remainder areas of Unit 18 by 21 days and the winter season in the lower Yukon by 10 days through the adoption of State Proposal 06.

At its March 2009 meeting, the Alaska Board of Game adopted Proposal 228, which liberalized the State harvest limit from antlered bulls to any moose for the Dec. 20–Jan. 20 season in the lower Yukon area of Unit 18. The State believed that the affected moose population has increased to a size that can support the harvest of cows.

At its November 12, 2009 work session, the Federal Subsistence Board adopted Special Action WSA08-13, submitted by Scammon Bay Traditional Council, which requested the harvest limit in the lower Yukon area of Unit 18 be increased to two moose per regulatory year, with one allowed in the fall and one in the winter.

The Alaska Board of Game, at its November 13–16, 2009 meeting, adopted new regulations to extend the winter season from Jan. 20 to Feb. 28 and move the boundary between the lower Yukon and the remainder areas, south to a more discernible geographic land mark.

State Management Objectives for Unit 18 (Perry 2008) are as follows:

- Allow the lower Yukon River moose population to increase above its estimated size of 2500–3500 moose. Allow the lower Kuskokwim River moose population to increase above its estimated size of 75–250 moose to at least 2000 moose.
- Maintain the current age and sex structure for both populations, with a minimum of 30 bulls:100 cows.
- Conduct seasonal sex and age composition surveys as weather allows.
- Conduct winter censuses and recruitment surveys in the established survey areas on a rotating basis.
- Conduct fall and/or winter trend counts to determine population trends.
- Conduct hunts consistent with population goals.
- Improve knowledge of and compliance with harvest reporting requirements and hunting regulations through education and incentives.
- Address user conflicts through education and hunter contacts.

WP10-56, submitted by the Yukon Delta National Wildlife Refuge, requested that the harvest limit in the lower Yukon area of Unit 18 (that portion north and west of a line from Cape Romanzof to Kusilvak Mountain to Mountain Village and excluding all Yukon River drainages upriver from Mountain Village) be changed to two moose per regulatory year. Hunters would be allowed to harvest one antlered bull in the fall season and one moose in the winter season. Hunters that did not harvest a moose in the fall would

be allowed to harvest two moose during the winter season. The proposal also delegated authority to the Yukon Delta National Wildlife Refuge manager to restrict the season, if needed, after consultation with the Alaska Department of Fish and Game. The proposal was supported by the Federal Subsistence Board with modification to extend the winter season to February 28.

WP10-57, submitted by the Yukon Delta National Wildlife Refuge, requested a change in a portion of the regulatory boundary description for Unit 18, north and west of a line from Cape Romanzof to Kusilvak Mountain to Mountain Village, and excluding all Yukon River drainages upriver from Mountain Village. This area is referred to as the lower Yukon hunt area. The proposal was supported by the Federal Subsistence Board with modification to remove the Cape Romanzof to Kusilvak Mountain section and replace with a descriptor for the Kashunuk River drainage.

Biological Background

In February 2008, the Yukon Delta National Wildlife Refuge and Alaska Department of Fish and Game conducted cooperative moose surveys in portions of Unit 18, including the furthest down river survey unit along the main stem of the Yukon River corridor from Mountain Village to Kotlik. The mid-point of the moose population estimate for this area was 2,828 moose when using traditional survey methods and 3,320 moose when a Sightability Correction Factor (SCF) was incorporated in the 2008 analysis (USFWS 2008). Using the SCF population estimate on the lower Yukon River (from Mountain Village to Emmonak), the resulting moose density estimate was 2.8 moose/mi.². The affected area has experienced rapid population growth since the end of the moratorium in 1994 (**Figure 1**) with an average annual growth rate of 27% for the period of 1994–2008. Based on the 2008 survey results, it appears that the affected population could support additional harvest with the current population size, density, and productivity (Doolittle 2009, pers. comm.). The most recent population composition data for lower Yukon moose shows 30 bulls per 100 cows and 69 calves per 100 cows, with 55% of cows having calves (Rearden 2011, pers. comm.). This data most likely reflects a growing population since the 2008 surveys.

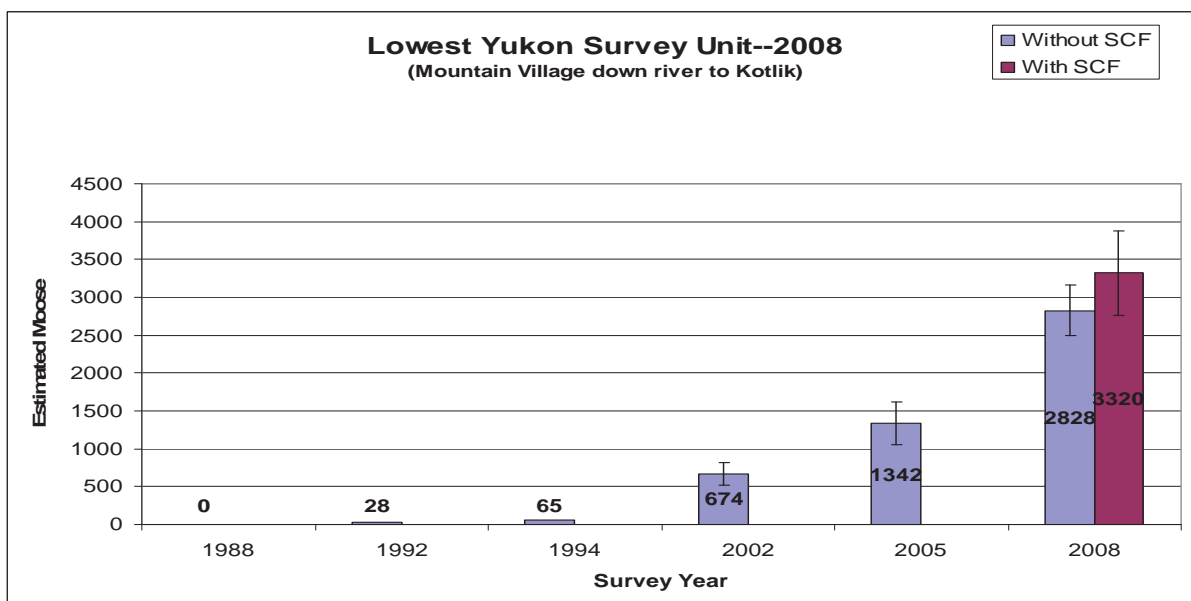


Figure 1. Moose population survey results from the lowest survey unit along the main stem of the Yukon River, 1988-2008 (UFWS 2008).

Habitat

Moose browse surveys have not been conducted within the affected area, thus there are no habitat data. Browse surveys would facilitate analysis of the impacts this moose population is having on its habitat, which could provide some insight into the carrying capacity of the habitat and the nutritional quality of the standing browse.

At the Federal Subsistence Board work session in November 2009, Mr. Gene Peltola, Refuge Manager of Yukon Delta National Wildlife Refuge, testified that if moose density continues to increase in the lower Yukon area of Unit 18, there is a risk that the population will exceed the carrying capacity of the habitat and experience a decline. Mr. Peltola stated that over the last three years there have been reports of localized calf and yearling die offs and this past winter reports of dead adult moose on the Yukon main stem. In addition, he stated that the refuge would prefer a proactive management approach because of the significance of the moose population to lower Yukon residents (FSB 2009).

Harvest History

Reported harvest totals from the fall (2005-2007) and winter seasons (2005–2009) are provided in **Table 1**. There appears to have been an increase in hunter success for the fall and winter seasons since 2005. From 2007 through 2009, the average annual reported winter moose harvest was 29. Even with the “any-moose” harvest limit provided in the 2009 winter season, the total reported winter harvest remains lower than anticipated. It should be noted that harvest information is typically collected through harvest ticket or registration permit reports submitted by users, which may undercount harvest (cf. Andersen and Alexander 1992). However, the reported moose harvest does show an increasing trend. Overall harvest continues to be lower than expected in Unit 18 relative to the moose population.

Effects of Proposal

If adopted, Proposal WP12-45 would shorten the fall season by 21 days from Aug. 10 – Sept. 30 to Sept. 1 – Sept. 30, and would change the harvest limit for the fall season from one antlered bull to one moose during the fall season, excluding a cow moose with a calf in a portion of Unit 18. This action would reduce the amount of hunting time during the fall season for Federally qualified subsistence users. In addition, changing the harvest limit to one moose would expand the segment of the moose population available for harvest. Allowing for harvest of cow moose could help slow the recruitment rate, thereby minimizing habitat degradation for the fast growing moose population on the lower Yukon.

If adopted, Proposal WP12-49 would lengthen the hunting season by approximately three months and modify the harvest limit to allow for the harvest of up to two moose during this time period, however, antlered bulls could only be taken from Sept. 1 to Sept. 30. This action would allow for increased subsistence harvest opportunities during the fall. This proposal would also help limit the growth of this quickly expanding moose population by reducing recruitment rates through a harvest at least partially directed at cows. This reduction may help prevent habitat degradation along the lower Yukon that could lead to a population crash if left unchecked.

OSM PRELIMINARY CONCLUSION

Support Proposal WP12-49.

Take no action on Proposal WP12-45.

Table 1. Total fall (ADF&G 2009) and winter (Perry 2011, pers. comm.) moose harvest reported by year for the lower Yukon area of Unit 18, 2005–2010.

Year	Reported fall moose harvest	Reported winter moose harvest
2005	97	14
2006	121	31
2007	162	29
2008	193	24
2009	178	51
2010	162	52
Total	913	201

Justification

The Federal Subsistence Board recently adopted Proposal WP10-56 to increase the harvest limit in the lower Yukon area of Unit 18 to two moose per regulatory year. Proposal WP12-49, if adopted, would provide additional opportunity for Federal subsistence users to harvest moose in the lower Yukon area of Unit 18 by lengthening the season and liberalizing harvest requirements from 1 antlered bull to 2 moose, except that antlered bulls could be taken only between Sept. 1 and Sept. 30. Moose densities along the lower Yukon are high and additional harvest should not have any negative impacts on the moose population. Proposal WP12-49 should help to reduce moose densities in this area, which would prevent or help to reduce negative impacts to habitat that could eventually lead to a crash in the population. The increased season length and hunting opportunities proposed in WP12-49 should meet the needs set forth by the proponent in WP12-45, as well as reducing the regulatory complexity between Federal and State lands in the area.

LITERATURE CITED

- ADF&G. 2009. Harvest Data Base. Data for Unit 18: 0101, 0102, 0105 Fall Moose Hunts, 2005–2007.
- Andersen, D.B., and C.L. Alexander. 1992. Subsistence hunting patterns and compliance with moose harvest reporting requirements in rural interior Alaska. ADF&G, Div. of Subsistence Tech. Paper No. 215. Juneau, AK. 30 pages.
- Doolittle, T. 2009. Supervisory Wildlife Biologist. Personal communication: email. Yukon Delta National Wildlife Refuge, USFWS, Bethel, AK.
- FSB. 2009. Transcript of the Federal Subsistence Board work session. November 12, 2009. Pages 25–27. Office of Subsistence Management, USFWS. Anchorage, AK.
- Pappas, G. 2009. Program Coordinator for Subsistence Liaison Team. Personal communication: email. ADF&G, Anchorage, AK.
- Perry, P. 2011. Wildlife Biologist. Personal communication: email. ADF&G. Bethel, AK.
- Perry, P. 2008. Unit 18 moose management report. Pages 269–284 in P. Harper, editor. Moose management report of survey and inventory activities 1 July 2005–30 June 2007. Alaska Department of Fish and Game. Project 1.0. Juneau, AK.
- Rearden, S. 2011. Wildlife Biologist. Personal communication: email. Yukon Delta National Wildlife Refuge. Bethel, AK.



USFWS. 2008. Moose Briefing Document. Presented to the Yukon-Kuskokwim Federal Subsistence Regional Advisory Council, Bethel, AK. Yukon Delta National Wildlife Refuge, Bethel, AK. 1pg.



WP12-44/48 Executive Summary		
General Description	<p>Proposal WP12-44 requests that the harvest limit for moose in Unit 18 remainder be changed from one antlered bull to one antlered bull or one cow without a calf. <i>Submitted by Zechariah C. Chaliak Sr. of Nunapithcuk</i></p> <p>Proposal WP12-48 requests a change to the harvest limit from 1 antlered bull to 1 moose during the winter season as well as an extension of the winter season in Unit 18 remainder from January 10 to the last day of February. <i>Submitted by the Yukon Delta National Wildlife Refuge</i></p>	
Proposed Regulation	WP12-44	
	<i>Unit 18 remainder — 1 antlered bull or 1 cow without a calf</i>	<i>Aug. 10 – Sept. 30 Dec. 20 – Jan. 10</i>
	WP12-48	
	<i>Unit 18 remainder — 1 antlered bull</i>	<i>Aug. 10 – Sept. 30</i>
	<i>Unit 18 remainder — 1 antlered bull moose</i>	<i>Dec. 20 – Jan. 10 the last day of February</i>
OSM Preliminary Conclusion	Oppose Proposal WP12-44. Support Proposal WP12-48.	
Yukon/Kuskokwim Delta Regional Council Recommendation		
Western Interior Regional Council Recommendation		
Interagency Staff Committee Comments		
ADF&G Comments	Oppose Proposal WP12-44 Support Proposal WP12-48 dependent upon Board of Game adoption	
Written Public Comments	None	

DRAFT STAFF ANALYSIS WP12-44/48

ISSUES

Proposal WP12-44, submitted by Zechariah C. Chaliak Sr. of Nunapithcuk, AK, requests that the harvest limit for moose in Unit 18 remainder be changed from one antlered bull to one antlered bull or one cow without a calf.

Proposal WP12-48, submitted by the Yukon Delta National Wildlife Refuge, requests a change to the harvest limit from 1 antlered bull to 1 moose during the winter season as well as an extension of the winter season in Unit 18 remainder from January 10 to the last day of February.

DISCUSSION

The proponent for Proposal WP12-44 states that cow moose are becoming too abundant in Unit 18 remainder and that a cow hunt should be allowed for the Aug. 10–Sept. 30 fall season for one calendar year, after which the hunt would go back to the 1 antlered bull requirement.

The proponent for Proposal WP12-48 states that both ADF&G and the USFWS are proposing to liberalize regulations for the winter moose season in Unit 18 remainder. The proponent believes healthy populations combined with a low harvest during the winter season justify liberalization of the season length and removal of the antlered requirement.

Note: During a phone discussion, the proponent requested that the winter hunt end on the last day of February, regardless of whether the year in question was a leap year or not. To satisfy this request, the OSM concluded that the regulation would read as “Dec. 20 – the last day of February.”

Existing Federal Regulation

Unit 18 remainder — Moose

Unit 18 remainder — 1 antlered bull

*Aug. 10 – Sept. 30
Dec. 20 – Jan. 10*

Proposed Federal Regulations

WP12-44

*Unit 18 remainder — 1 antlered bull **or 1 cow without a calf***

*Aug. 10 – Sept. 30
Dec. 20 – Jan. 10*

WP12-48

Unit 18 remainder — 1 antlered bull

Unit 18 remainder — 1 ~~antlered bull~~ moose

*Aug. 10 – Sept. 30
Dec. 20 – ~~Jan. 10~~ the last
day of February*



Existing State Regulations

Unit 18 remainder — Moose

Residents, one antlered bull
Or
One antlered bull for nonresidents

Aug. 10 – Sept. 30
Dec. 20 – Jan. 10
Sept. 1 – Sept. 30

Extent of Federal Public Lands

Federal public lands comprise approximately 65% of the remainder area of Unit 18, approximately 90% of which is managed by the U.S. Fish and Wildlife Service. The U.S. Fish and Wildlife Service managed lands are located within the Yukon Delta National Wildlife Refuge. The other 10% of Federal public lands is managed by the Bureau of Land Management (**Map 1**).

Customary and Traditional Use Determinations

The customary and traditional use determination for moose in Unit 18 remainder includes all residents of Unit 18. Additionally, residents of St. Michael, Stebbins, Aniak, and Chuathbaluk can hunt in portions of of Unit 18 remainder under Federal moose regulations.

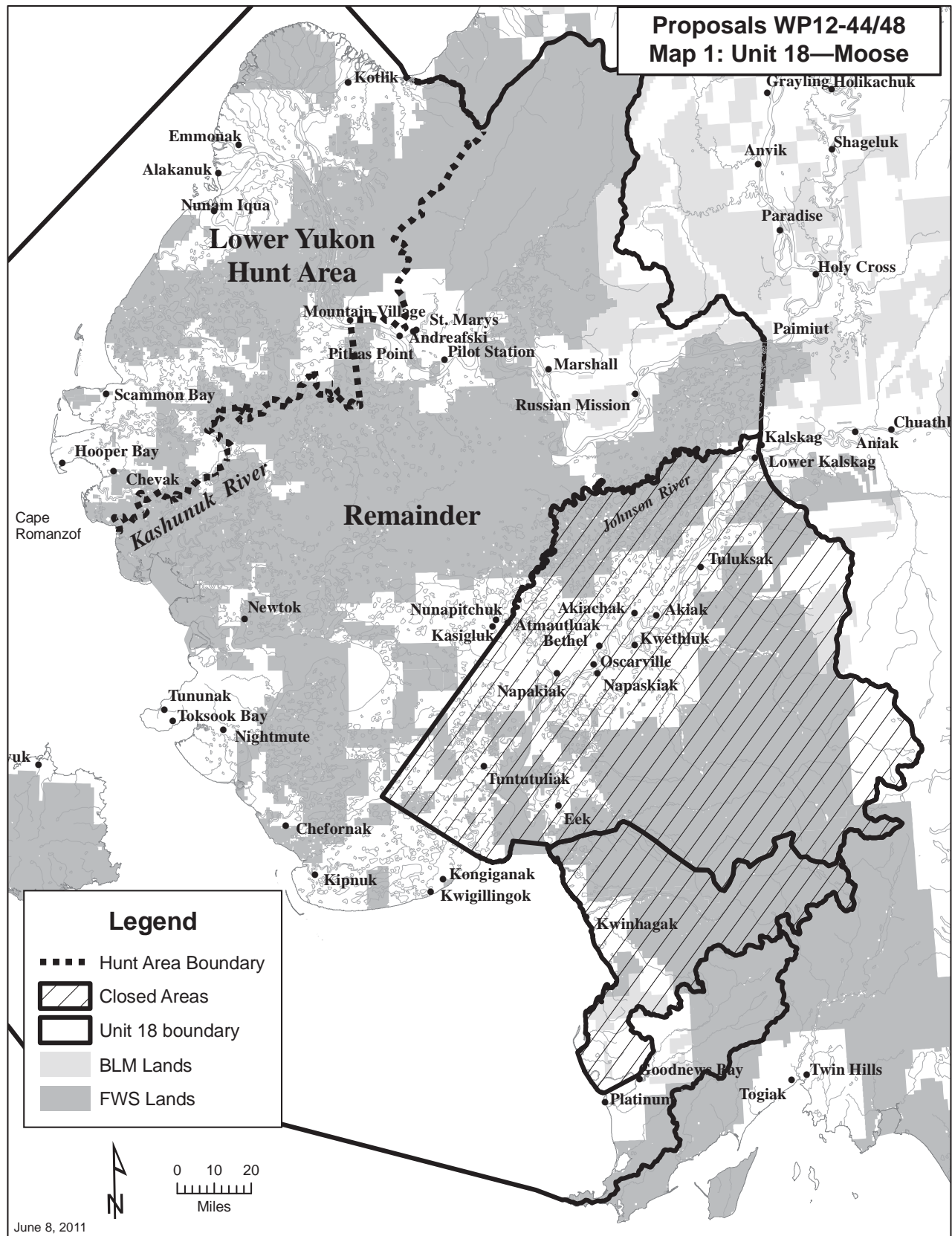
Regulatory History

Moose harvest season dates in Unit 18 have varied over the past 10 years, however harvest limits have remained constant at one bull. As the moose population in the area grew, the closure of Federal public lands to non-Federally qualified users was lifted and the seasons were extended.

In 2006, proposal WP06-30 requested the removal of the Federal closure to non-Federally qualified users for the Unit 18 remainder fall moose season (Sept. 1–Sept 30). The biological information presented in the WP06-30 analysis supported the removal of the closure for not only Unit 18 remainder, but also that portion of Unit 18 downstream from Mountain Village. However, the Yukon-Kuskokwim Delta Subsistence Regional Advisory Council opposed the proposal because of local concerns over increased competition. At its May 2006 meeting, the Federal Subsistence Board (Board) deferred action on the proposal for one year with a commitment to revisit the proposed regulation change at its May 2007 meeting. The intent for the deferral was to allow time for Yukon Delta National Wildlife Refuge (YDNWR) staff to conduct information outreach on the status of the moose population in communities before making a decision.

The rapid growth and current size of the moose population along with local concerns over increased competition created disagreement over the appropriateness of the Federal closure, which lead to several proposals in October 2006:

- Proposal WP07-26 requested a positive customary and traditional use determination for moose in Unit 18 for the residents of St. Michaels and Stebbins. The Board adopted the proposed regulatory change in May 2007.
- Proposal WP07-27 requested an Aug. 10–Aug. 19 families-only moose season in Unit 18 remainder. The Board did not adopt the proposal at its May 2007 meeting because it cannot adopt regulations that favor families only.



- Proposal WP07-28 requested an earlier season in Unit 18 remainder beginning on Aug. 20 instead of September 1. The Board adopted a modified recommendation of an August 10 season open date for the Yukon River drainage portion of Unit 18 and Unit 18 remainder at its 2007 meeting.
- Proposal WP07-29 requested a liberalization of the harvest limit from one antlered bull to one moose in Unit 18 remainder with a winter season extension to January 20, instead of January 10. The Board adopted the season extension with the modification of one moose for the Yukon River drainage below and including Mt. Village only, due to the very high calf composition and concerns of the population size and growth rate may be adversely affecting the habitat's carrying capacity in that area.
- Proposal WP07-30 requested a continuous one bull harvest limit from September 1 to March 31. Because such liberalizations in harvest limit should be adopted gradually to allow for close monitoring of harvest effects on the population, the Board did not adopt the proposed regulatory change.
- Proposal WP07-31 requested an August 20–31 moose season with a one antlered bull harvest limit for residents of Andreafsky and St. Mary's within the Andreafsky River drainage of Unit 18 remainder; and Proposal WP07-64 requested the Board extend the fall moose season by adopting the proposed 12-day, August 20–31 extension with a one antlered bull or cow moose harvest limit for residents of Marshall. If a proposal seeks a prioritization for use of a subsistence resource among rural residents having customary and traditional use of that resource, as was the case with these two proposals, an analysis must be done in accordance with Section 804 of ANILCA if the population necessitates such prioritization. Because the moose population in this area could support harvest by all Federally qualified subsistence users, an "804" analysis was not conducted, and the Board did not adopt these proposals.
- At its May 2007 meeting, the Board adopted Proposal WP07-32 (deferred proposal WP06-30) to open Federal public lands to non-Federally qualified subsistence users. The Board stated that the closure was no longer warranted as the moose population had increased to the point where additional harvest could occur. The Refuge Manager of the YDNWR made extensive outreach efforts with local residents and committed to lessen competition by prohibiting transporters access to local subsistence use areas (Rearden 2007, pers. comm.).

Proposal WP08-33, submitted by the Association of Village Council Presidents, requested a closure of Federal public lands to non-Federally qualified users during the fall and winter moose seasons in Unit 18, that portion of the Yukon River drainage and Unit 18 remainder. The proponent requested this closure until three related tasks were accomplished: 1) an accurate assessment of moose harvest needed by residents of Unit 18; 2) an accurate assessment of the moose population in Unit 18; and 3) development of a regionally acceptable moose management plan. The proposal was rejected by the Federal Subsistence Board at its May 2008 meeting.

In 2009, Special Actions WSA09-12/13/14 requested a season extension to February 28 and a change in the harvest limit from one antlered bull to one moose in Unit 18 remainder. The special action requests were submitted due to the lack of snow that limited travel and hunting opportunity within an area where the moose population appeared to be increasing and was considered healthy. The Board approved the requests to extend the season and change the harvest limit to one moose.

In 2010, Special Action WSA10-04 requested that the Unit 18 remainder winter moose season be extended to February 28th and the harvest limit be changed from one antlered bull to one moose. This

Special Action request was submitted due to adverse travelling conditions in the area as a result of unusually warm weather which made travel by snowmachine difficult for local hunters. The proposal was approved by the Federal Subsistence Board.

Biological Background

Moose began to immigrate into the Yukon-Kuskokwim (Y-K) Delta during the mid-to-late 1940s. The Yukon River population occupies most of the available riparian habitat and is growing, while the Kuskokwim population is still small and in the process of colonizing all available riparian habitats. Most of the Y-K Delta is lowland treeless tundra and is therefore not suitable as winter moose habitat (Perry 2008).

Hunting pressure from communities along the Kuskokwim River has limited the growth of moose populations along the riparian corridors, while moose populations along the Yukon River have been similarly slowed, though compliance with hunting regulations has improved moose populations in this area (Perry 2008). There is a large amount of available habitat for moose along the Kuskokwim River drainage and its tributaries, allowing for colonization and population expansion.

The Paimiut survey area in Unit 18 covers the Yukon River immediately downriver of Marshall to Paimiut. Although this survey unit does not cover the entire Unit 18 remainder, it covers the densest population of moose in the Unit 18 remainder area. The most recent survey for this area was conducted in 2006. The mid-point of the 2006 survey estimate was 3,614 moose with a density of 2.3 moose per square mile (Sundown 2009, pers. comm.), which was an increase from the 1992 density estimate of 0.64 moose per square mile (Perry 2008). Based on the 2006 survey data the population growth rate was estimated at 11% per year. Using the estimated growth rate, the current density in the area may be near 3 moose per square mile (Wald 2010, pers. comm.). However, Federal and State managers are hesitant to support liberalizing the fall hunt (as proposed in WP12-44) without more recent density data (Rearden 2011, pers. comm.).

The moose population down river of Mountain Village and adjacent to Unit 18 remainder increased significantly from 1994 to 2008. The lower Yukon area has experienced rapid population growth since 1994 with an average growth rate of 27% (1994–2009) (USFWS 2008). The 2008 estimate along the main stem of the Yukon River corridor from Mountain Village to Kotlik was 3,320 moose. From Mountain Village to Emmonak, the moose density estimate was 2.8 moose per square mile.

The ADF&G management objective for the Yukon-Kuskokwim Delta and Yukon River moose populations in Unit 18 are to maintain the current age and sex structure, with a minimum of 30 bulls:100 cows. Moose composition surveys from 2005 showed a ratio of 36.9 bulls per hundred cows and 23.9 bulls per hundred cows for the Lowest Yukon and Paimiut survey areas respectively (Perry 2008). In addition, calf survival was much higher in the Lowest Yukon survey area and almost 40% of cows were found to have twins with them in early winter (Perry 2008). More recent moose composition data for Unit 18 remainder showed a ratio of 42 bulls per 100 cows and 61 calves per 100 cows while 28% of cows had twins with them (Rearden 2011, pers. comm.). These numbers indicate that the moose population has exceeded the management objective for sex structure in the unit.

Habitat

A minimum of 8,000 square miles of moose habitat exists in Unit 18 (Perry 2008). Of this, approximately 4,500 square miles of habitat occurs along the riparian zone of the Yukon River. The most productive moose habitat in Unit 18 is found on the islands and adjacent sloughs from Paimuit to Mountain Village.



Several tributaries within the Yukon Delta contain suitable moose habitat. Despite this, the area has fewer moose than could be supported by the available forage (Perry 2008).

Harvest History

In Unit 18 remainder, during the 2008/2009 season, 189 moose were reported harvested, with 48 of that total being harvested in the winter season (Sundown 2010, pers. comm.). In 2007/2008, 248 moose were harvested with 50 harvested in the winter and in 2006/2007, 166 moose were harvested with 39 in the winter (Sundown 2010, pers. comm.). Most local residents living within the Kuskokwim River drainage area hunt the Yukon River drainage area during winter, when they can travel via snowmachine (Rearden 2011, pers. comm.).

As a result of extending the winter season till February 28 and allowing the harvest of any moose for the last two years during the extension (WSA09-12/13/14 and WSA10-04), 66 (45 cows and 21 bulls) and 50 additional moose (39 cows and 11 bulls) were harvested in 2009 and 2010 respectively (Rearden 2011, pers. comm.). **Table 1** gives a summary of winter moose harvest for Unit 18 remainder (Perry 2011, pers. comm.). Overall harvest in Unit 18 remainder more than doubled between 2005 and 2010, with the majority of harvest coming from residents of Unit 18.

Table 1. Winter moose harvest data for Unit 18 remainder, 2005-2011 (Perry pers. comm. 2011).

Year	Local Resident Harvest	Nonlocal Resident Harvest	Total Winter Harvest
2005-2006	46	1	47
2006-2007	38	1	39
2007-2008	49	1	50
2008-2009	58	3	61
2009-2010	67	2	69
2010-2011	96	4	100

Effects of Proposal

If adopted, Proposal WP12-44 would revise current hunting regulations to allow for the harvest of one cow moose without a calf for the Aug. 10–Sept. 30 fall season for one calendar year, however, the regulations would revert to the current one antlered bull requirement after one year. This action would allow for more hunting opportunities for Federally qualified subsistence users by expanding the segment of the moose population available for harvest, but would only be in effect for one year. There would be some reduction to the moose population under this proposal, but the overall extent of the effects are unknown since the most recent density estimates for the area are five years old.

If adopted, Proposal WP12-48 would add an additional month and a half of harvest opportunity for Federally qualified users and would liberalize the harvest limit by allowing any moose to be harvested instead of 1 antlered bull during the winter season only. Impacts on the moose population in Unit 18 remainder should be minimal as the population is healthy and is believed to be increasing. A companion proposal is expected to be submitted before the Alaska Board of Game for Unit 18 remainder by ADF&G. WP12-48 would align Federal and State regulations if the State proposal is adopted, thereby reducing the regulatory complexity for Federally qualified subsistence users in this area.

OSM PRELIMINARY CONCLUSION

Oppose Proposal WP12-44.

Support Proposal WP12-48.

Justification

Adopting Proposal WP12-48 would add an additional month and a half of harvest opportunity during the winter season for Federally qualified users and liberalize the harvest from one bull to one moose in Unit 18 remainder. Although moose populations appear to be healthy and increasing in Unit 18 remainder, the most recent density estimates for the unit are five years old and as a result, Federal and State managers are hesitant to allow for an even more liberal harvest during the fall hunting season as requested in WP12-44. Harvest of moose has almost doubled between 2005 and 2009, with most of this harvest coming from residents of Unit 18. In addition, Proposal WP12-48 may satisfy the proponent of Proposal WP12-44 because most local residents living within the Kuskokwim River drainage area are more likely to hunt the Yukon River drainage area during winter, when hunters can travel via snowmachine (Rearden 2011, pers. comm.).

LITERATURE CITED

Perry, P. 2011. Wildlife Biologist. Personal communication: email. Alaska Department of Fish and Game. Bethel, AK.

Perry, P. 2008. Unit 18 moose management report. Pages 269–284 in P. Harper, editor. Moose management report of survey and inventory activities 1 July 2005–30 June 2007. Alaska Department of Fish and Game. Project 1.0. Juneau, AK.

Rearden, M. 2007. Refuge Manager. Personal communication: email. Yukon Delta National Wildlife Refuge, USFWS, Bethel, AK.

Rearden, S. 2011. Wildlife Biologist. Personal communication.: email. Yukon Delta National Wildlife Refuge. Bethel, AK.

Sundown, R. 2009. Subsistence Resource Specialist. Personal communication: email. Yukon Delta National Wildlife Refuge, USFWS, Bethel, AK.

Sundown, R. 2010. Subsistence Resource Specialist Personal communication: email. Yukon Delta National Wildlife Refuge, USFWS, Bethel, AK.

US Fish and Wildlife Service. 2008. Moose Briefing Document. Presented to the Yukon-Kuskokwim Federal Subsistence Regional Advisory Council, Bethel, AK. Yukon Delta National Wildlife Refuge, Bethel, AK. 1pg.

US Fish and Wildlife Service. Office of Subsistence Management online harvest database. < <https://ifw7asm-orcldb.fws.gov>>. Retrieved: May 5, 2011.

Wald, E. 2010. Wildlife Biologist. Personal communication: email. Yukon Delta National Wildlife Refuge, USFWS, Bethel, AK.



ADF&G Comments on WP12-44 and WP12-48
August 29, 2011; Page 1 of 2

Alaska Department of Fish and Game
Comments to Regional Advisory Council

Wildlife Proposal WP12-44: This proposal requests eliminating the Unit 18 Remainder federal subsistence antlered bull moose harvest requirement for both the fall and winter hunts for one season.

Wildlife Proposal WP12-48: This proposal requests liberalization of the Unit 18 “Remainder” segment of the federal subsistence moose winter hunting season. The proposal also requests eliminating the antlered bull federal subsistence moose harvest requirement.

Introduction: The proponent of WP12-44 request authorization to harvest cow moose without calves in both the fall and winter federal subsistence moose hunts in Unit 18 remainder for one year. The proponent indicates the numbers of cow moose in the area are becoming too abundant and need to be temporarily reduced through harvesting.

The proponent of WP12-48 requests the federal subsistence moose hunting winter season in Unit 18 Remainder be liberalized from December 20 through January 10 to December 20 through February 29. The proponent also requests changing the bag limit to any moose. The proponent indicates the moose population health combined with a low harvest rate during the winter justifies this proposal.

The proponents of these proposals indicate adoption of this proposal will result in greater opportunity and higher success rates for federal subsistence users.

Impact on Subsistence Users: If WP12-44 is adopted, federal subsistence users participating in the Unit 18 Remainder federal subsistence moose hunts will have greater opportunities to harvest a moose, with or without antlers, for the requested one year. If WP12-48 is adopted, federal subsistence moose hunters participating in the in Unit 18 Remainder winter moose hunt will have approximately 49 more days (245% increase on leap years) to harvest any moose with or without antlers. If adopted, federal subsistence moose hunter success rates are expected to climb.

Opportunity Provided by State: In Unit 18 Remainder, the state moose winter hunting season is from December 20 through January 10 with a bag limit of one antlered bull. Meat-on-the-bone salvage is required thus meat taken prior to October 1 must remain on the bones of the front and hindquarters until removed from the field or processed for human consumption.

In Unit 18 Remainder, the state moose fall hunting season is from August 10 through September 30 for residents of Alaska with a bag limit of one antlered bull. The nonresident state moose hunting season is September 1 through September 30 with a bag limit of one antlered bull. The state winter hunting season for Unit 18 Remainder is from December 20 through January 10 with a bag limit of one antlered bull. Meat-on-the-bone salvage is required thus meat taken prior to October 1 must remain on the bones of the front and hindquarters until removed from the field or processed for human consumption. Residents may not harvest more than one moose per year between the fall and winter seasons.



ADF&G Comments on WP12-44 and WP12-48
August 29, 2011; Page 1 of 2

Conservation Issues: The Lower Yukon River moose population is growing rapidly and currently is not a conservation concern. If the moose population continues at a high rate of growth, over-browsing may result in future management and conservation considerations. Moose are abundant in areas of Unit 18 currently open for hunting, thanks to the success of the moratoria. Information presented to the Federal Subsistence Board in 2007 indicated that the moose population in areas targeted in this proposal is highly productive and is continuing to grow.

Enforcement Issues: Differences in federal and state regulations resulting from adoption of this proposal create enforcement problems in areas with mixed land ownership. The boundaries between federal and state lands are not marked and often difficult to locate on the ground.

Other Comments: The proponent indicates that ADF&G is expected to submit a similar proposal to the Alaska Board of Game. The department will submit similar if not more liberal proposals to the Alaska Board of Game requesting liberalization of harvest regulations for portions of Unit 18

Recommendation:

WP12-44: Oppose

WP12-48: Support dependent upon Board of Game adoption



**Alaska Chapter SCI
PO Box 770511
Eagle River, AK 99577
(907) 980-9018**



October 28, 2011

Cliff Judkins, Chair
Alaska Board of Game
PO Box 115526
Juneau, AK 99811

Dear Mr. Judkins:

Please accept the following comments as the testimony of the Alaska Chapter of Safari Club International. SCI is the world's leading hunting organization, and SCI Alaska Chapter is a leader in preserving the freedom to hunt here in Alaska.

SCI Alaska Chapter has several concerns regarding the proposals the Board will be taking up at its upcoming meeting in Barrow, Alaska. These concerns reflect our continued support for the opportunity to hunt based on sound science and the Alaska Constitution's provisions for wildlife resources to be utilized by the people of Alaska in common.

Proposals 2 – 4 and 6 are related to the issuance permits for musk ox with 2 – 4 requiring the permits be issued in a specific location. Proposal 6 is related to moose hunts and appears to have the opposite intent regarding location of issuance.

Since all wildlife belongs to the people of Alaska in common, we are in opposition to Proposals 2 – 4 and in support of Proposal 6. It appears to us that the only function of limiting the place where permits may be issued is an overt attempt to circumvent the intent of our constitution by placing an undue burden on the average hunter. All permits including registration permits should be available at any Department office or better yet through an online process such as is now available for the purchase of licenses and king salmon stamps. Many states are going to online licensing systems and we feel our Department should take a serious look at making this option available here in Alaska. Furthermore, it serves no conservation or scientific purpose to limit where permits may be obtained. Therefore we encourage the Board to oppose Proposals 2 – 4 and support Proposal 6.

We have serious concerns over Proposals 10 – 12. These proposals appear to trend away from the standards of the North American Model for Wildlife Management and the idea fostered by Roosevelt and his contemporaries that wildlife would best be conserved for future generations if certain standards were adhered to by hunters. Use of increasingly better technologies was one of the items that the forefathers of the hunting conservation movement counseled against preferring that hunters learn their craft through experience and studious observation of the species they were hunting.

Proposals 10 – 12 may provide expeditious methods for increasing the opportunity to harvest an animal, but they certainly do not conform to the ideals handed down to us as hunter-conservationists. We do realize that the opportunity to harvest an animal in rural Alaska is often more of necessity for those that live there than for other hunters; however, we believe the age old

SCI's Top Gun Chapter



skills utilized by past generations of hunters need to be passed down and by that method increase the likelihood of success. Use of modern technologies such as electronic calls and power boats do not fit in that category, and the use of salt licks is nothing more than baiting.

Perhaps all of these methods would be alright if the moose population was high and in danger of overutilizing its available habitat; however, unless the latest comp counts indicate such and the Department using such data can make the case that the population won't be seriously impacted, we would be opposed to Proposals 10 – 12. If, however, the Board chooses to pass these proposals we would respectfully request that they ask the Department to allocate sufficient resources to ensure the moose population remains healthy and the harvestable surplus provides for all Alaskans an opportunity to hunt.

There are several Proposals that relax the seasons and or bag limits on species that we have concerns over; however, we do not have sufficient data to determine whether these are reasonable requests or not. With that disclaimer, we would hope the Board and the Department would proceed cautiously in implementing Proposals 7, 8, 16, 17, 20 and 27 if that is their decision. Implementation of these proposals, if that is the eventual outcome should be accompanied by some method of monitoring these populations so that they do not result in impacting the populations in a negative manner.

We are supportive of Proposals 35 and 36. Although wildlife does belong to all Alaskans, and there are those who do oppose management of wildlife for hunting, it is our contention that such management is not only warranted based on historical perspectives, but has proven over time to be highly beneficial to wildlife. It is also true that hunters and hunting have paid the lions share for professional wildlife management and the entire professional regime established under the North American Model is centered on revenues generated by hunting and associated costs for firearms and ammunition.

The fact is that more North American Wildlife species were restored from extremely low level populations at the turn of the last century than those restored through implementation of the Endangered Species Act. The juxtaposition of hunting and wildlife has been and continues to be intricately intertwined with successful management for healthy populations. Furthermore those who disagree would impose their view of the world on those of us who choose to continue the millennia old heritage of hunting. Quite frankly they are not only intolerant of differing viewpoints, they contribute little to nothing for wildlife management. It is our view that Proposals 36 and 37 support wildlife, professional management of wildlife and one of humankind's oldest traditions. Therefore, we strongly support these proposals.

Thank you for taking the time to read and consider our views on these important issues coming before the Board of Game. If you have any questions, you may contact us at (907) 980-9018 or email admin@aksafariclub.org.

Sincerely,



Terry Holliday
President



To: Board of Game Comments, Alaska Department of Fish and Game
Beards Support Section
October 25, 2011

Proposal 36/ Unit 15C

GV Pg 1

Proposal 35/ Unit 15A

Board of Game,

This letter is to voice Opposition for the ADF&G proposed aerial wolf kill plans on the Kenai Peninsula, more specifically Proposal 35/ Unit 15 A and in particular Proposal 36/ Unit 15C.

The area north of Kachemak Bay is a well used area. It is a main area for the Central and Lower Kenai Peninsula dog sled teams to train all winter. Besides mushers, there are many skiers, snowmachiners and trappers using the area every day. Apparently a different aerial wolf kill operation halted for the first two weeks of the Iditarod race, but recreational use in the north Kachemak Bay area occurs EVERY day.

Also East End Road, leading to the area north of Kachemak Bay, is a well populated residential area with many cabins extending from East End Road to the Caribou Hills. A 'buffered' zone is impractical if not Impossible.

This entire area is already impacted with too many planes flying overhead (I think because it is in the airport's flight path). I personally saw two planes almost collide within 400 yards this summer in this specific area. Besides safety issues, there are noise and disturbance issues already for residents with the high number of flights.

ADF&G admits there have been no wolf studies done in Unit 15C, so no one knows if there are any significant number of wolves. Late this summer, months before hearing about this aerial wolf kill plan, I asked a member of the cattlemen's association at the 'head of the bay' (in the referred to northern part of Kachemak Bay) if he lost any of his cattle to wolves last winter. He replied, "No, he did not lose any cattle to wolves last winter",

There has been in the last winter an alarming explosion of snowshoe rabbits on the lower Kenai Peninsula. Wolves dine on these rabbits and would not expend their energy on bringing down moose. Furthermore, these wolves play an important role in being predators in order to control the rabbit population. I don't think moose eat rabbits. But rabbits do eat the upcoming spruce trees which last winter were devastated by the rabbits.

As admitted by ADF&G, there also are no studies on the impact of brown and black bears on moose kills in Unit 15C. Again, being a resident of the area for years, I have personal knowledge of several moose kills by bear. I have NEVER known of a related moose kill by wolves ever on the lower Kenai Peninsula. In fact, I have never even seen a wolf in the area.

According to the Homer News, the following statement was a quote from Tony Kavalok, Division of Wildlife Conservation, regarding the proposed wolf survey for Unit 15C. "I expect we'll find bears will be significant predators."



To: Board of Game Comments, Alaska Department of Fish and Game
Boards Support Section
October 25, 2011

Proposal ~~36~~/Unit 15 ~~C~~

GV Pg 2

Proposal 35/Unit 15A

If ADF&G is concerned about restoring the abundance of big game, i.e. moose, the most obvious factors seem to be brown and black bear killings of moose and moose killed by human motorists- just look at all the road kill. There are signs posted along the highways in Kenai counting the very high number of 'highway moose kills'.

A ADG&F brochure states that 'predation control isn't done until biologists have studies on the causes of declining game population and the impacts of predators and tried other methods. In Unit 15C near Homer and Anchor Point, the general moose population has been healthy and moose population in regards to the intensive management objective has been met. There has never been a wolf census in Unit 15C. Wolf pack and distribution in not well known.

Then why is ADF&G so eager to implement an aerial wolf slaughter plan without giving the public much notice OR waiting for studies to be done, when there is no known information on the number of wolves on the Kenai OR who is actually killing the moose. Who then benefits from the plan? Is it the privately owned helicopter companies? Are there any Board of Game or Advisory counsel members that have personal friendships with these helicopter companies?

What is known in Unit 15C is it is a populated area and there is heavy use all winter by dog sled teams and other recreational users There is already too much flight traffic. No studies have EVER been done on wolves in the area, just guesses. There seems to be a lack of concern that wolves as predators have a useful purpose in the overall ecosystem on the peninsula and food chain.

If Tony Kavalok feels that "I just don't think it's going to be a big deal" (referring to aerial wolf kills), maybe he should ask the wolves or conscientious people that base their decisions on studies and facts, especially before implementation of a 5 year plan!

Gypsy Vanner
Concerned Citizen
Homer, Alaska

cc: Mark Begich
Paul Seaton



10/28/11

Attn: Board of Game Comments
AK Dept of Fish & Game
Boards Support Section

Dear Board of Game:

My family has presented comments to the Local Advisory Committee and to the BOG before, and we certainly have appreciated the invitation and the open process. **I am very opposed to Proposals 35 and 36**, and here is why:

First, it appears that our public input about these proposals is being quite limited. This gives an undemocratic appearance to these aerial wolf killing proposals. The process seems untrustworthy. Since the BOG has a recent track record of supporting aerial wolf killing, these proposals especially need time and space for public input. I agree that it would be better if the BOG would kindly postpone voting on 35 and 36 until your January meeting in Anchorage. This is an important issue, near and dear to hearts and minds of a majority of Alaskans. Thank you for preserving an open and democratic information and questioning process. The Barrow meeting could have call-in snafus, given weather, distance and technical communication issues that would limit input.

Also I am concerned that 35 and 36 have not been carefully thought out. If the moose populations are not declining in Unit 15c, why kill the wolves? If the reason for moose decline in Unit 15a is poor habitat, why kill the wolves? Apparently prior hunters over-harvested bull moose and that may be why moose numbers have dropped. No reason here to blame the wolves.

According to our friends in the Kenai, they are an especially outdoorsy, rugged group of recreationalists year round. Our friends and their kids are out snowshoeing, camping, skiing, snowmobiling all winter, and they do not want to feel imperiled each time a plane flies over, wondering if beginner wolf hunters will start shooting. ~~Because of the dense~~ population of the Kenai and its heavy recreational use by locals and Anchorage folks, the expansion of aerial wolf killing seems unwise and impractical.

Also I think aerial wolf killing is so controversial that it is a detriment to our state. More and more Alaskans regard it as inhumane, abhorrent and self-serving for a small interest group. Expanding aerial killing may cause the issue to rise again to a statewide initiative vote again where the whole practice statewide could be banned.

Thank you very much for considering these points.

Sincerely,
Maureen P. Longworth
3099 Nowell Ave
Juneau, AK 99801



10-24-11

Alaska Board of Game Members,

I am the President of the Alaska Frontier Trappers Association (AFTA) and I would like to submit comments on Proposals 124-128 on the Association's behalf. Proposal 124-127 all specifically concern National Parks so I am not sure if the Board has jurisdiction over these proposed regulation changes or if they will have to be handled on the Federal level. The AFTA is opposed to Proposal 124, we do not agree that requiring trap and snare identification will benefit the resource, make trapping safer or reduce non-target catch, furthermore, this will open the door for this kind of identification requirement on a statewide level. This will be a burden on all trappers and would receive much opposition from most trappers statewide. The AFTA is opposed to proposal 125. The 72 hour trap check requirement is not feasible in the State of Alaska. There is too much area that is not conveniently accessible. Many trappers run traplines on foot or snow machine that takes them great distances from home or the road system. Other trappers work during the week and youth trappers have school and are limited to the weekends to check their traps. This proposal, again, would open the door to such a regulation statewide. If adopted this would strictly limit the number of Alaskans that could take part in trapping. The AFTA is opposed to Proposal 126 and 127 concerning snaring black bears. The Alaska Department of Fish and Game has determined that intensive management of black bears, including the use of bucket snares, is an effective means to reduce an overpopulation of black bears and that this is necessary to help the moose populations recover. Listing black bears as furbearers has opened up new opportunities for trappers to harvest bears as well as making it legal to sell the hides. There are regulations in effect that ensure snaring of black bears is done in a safe and ethical manner which also minimizes conflict with any other user groups. The AFTA is opposed to Proposal 128. There is no enforcement action taken against a trapper who turns in an incidental, non-target catch to ADF&G. There is no need for a regulation which makes it legal to retain an animal that is out of season at the time it is caught. It would reflect negatively on trappers throughout the state for the public to see them harvest out of season furbearers. The proposal states that this change will insure all furbearers are salvaged. What if a trapper catches more than three non-target animals? We believe the regulations concerning incidental catch work well as they currently are. Thank you for considering our comments on these Proposals.



Steve Schafer
President
Alaska Frontier Trappers Assn.



Attention: Board of Game Comments
ADF & G
Boards Support Section
P.O.Box 115526
Juneau, Alaska 99811-5526

Gentlemen:

The concerned citizens of the lower Kenai Peninsula, with the support of Homer's advisory board, express their strong opposition to proposals #35 and #36, regarding the airborne predation (IM) of wolves in management units 15A and 15C.

Clearly ADF & G's proposal is illegal, untimely and unsupported by scientific data. If passed by the Game Board at it's remote and inaccessible November meeting in Barrow, it will FAIL it's inevitable legal challenge.

While the wolf is a mighty predator, highly adaptable to opportunistic natural conditions, he is no match against the UNFAIR CHASE of human predators with arms and airplanes. It is up to humans to control their own bestial and predatory behavior.

If the assigned ADF & G representatives won't protect Alaska's wildlife, the people must rise up and do so.

Sincerely,
Carrie Reed
4048 Bartlett st. #13
Homer, Alaska 99603



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

10-26-2011

Dear Board of Game,

Hi, my name is Paul Atkins and I live here in Kotzebue. My family and I have lived and worked here for the last 13 years. I teach at the high school and also work as an instructor at UAF'S Chukchi Campus. I have hunted and harvested meat from this unit every year that I have been eligible.

This letter is in regards to Moose hunting here in game unit 23 and more specifically in reference to the RM880 permit that is issued each summer.

I, like many, feel that some residents of this area are unfairly being left out for this permit. The time line to obtain the permit, which runs from June 1st to July 15th, cannot be met by all and we feel that we are being discriminated against due to us not being here to get the tag.

Some long time residents like myself are not here in June and July and have no way to apply for the permit due to the fact that it specifically states, "that you must obtain the permit in person".

We believe this needs to be changed or at least the timeline lengthened from May 1st through July 15.

The 2011 fall season was very tough for many subsistent hunters. Many of us, even though we took several trips in search of game animals, did not harvest a bull moose during the regular Sept. 1-20 hunt. And since we did not have the RM880 tag we couldn't harvest a cow. The past few years this has become commonplace since the introduction of the permit. The allotted time of 20 days to take legal bull moose has left many of us without meat for the winter.


With the high price of gas combined with the high cost of food here in Kotzebue it is something that has to be addressed. In addition to moose the caribou are getting hard to come by due to them migrating further east and not through our area. All in all this makes it very tough for most of us.

Many of us also believe that the RM880 permit was designed to keep certain people from being allowed to harvest a moose during the specific time period. I can think of no other reason? It is rumored, and we all hate rumors, that it was designed to keep people who don't live here full time and the trophy hunters from being able to hunt moose during the long season that the RM880 allows. Again I believe this to be discrimination. The years before the permit was required we ALL had the option of taking our one moose when we needed it and time allowed. We feel that the system worked well.

Bottom line, the RM880 tag does not meet the needs of all residents here in our community. It needs to be changed or least the dates changed to include May 1st as the beginning day to obtain the permit. Or at least allow us to obtain the tag through the mail or by some other means.

I know it's to late to add this to this year's proposals and also bring it before the board, but I hope you will take it into consideration for the next meeting. Moose hunting is a privilege and the harvest of a moose or any animal for that matter helps us sustain a certain quality of life. Moose permits shouldn't be limited to residents that are only here at certain times of the year.

Sincerely,


Paul Atkins
PO Box 1411
Kotzebue, AK 99752
907-442-2325



14608 Foxwood Circle
Tyler TX 75703

October 27, 2011

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

Re: OPPOSE Board of Game Proposals # 35 and # 36

To the Board Members:

Based on reports from the Alaska Fish & Game, the eradication of wolves on the Kenai Peninsula is not a valid solution to declining moose population and must not be carried out. Clearly, changes in the environment and moose habitat have been the basis for any such decline. That and past profligate over-hunting of moose are the real causes. The planned kills are unreasonable, inefficient, and are not biologically necessary.

The very act of aerial kills is obscene and disgusting and certainly discourages tourist travel in the state of Alaska. I have traveled in Alaska in the past, but I for one refuse to spend money in a state with such outrageous practices. In addition, the process the BOG has described for the eradication is dangerous to other wildlife and humans in the area. It is absurd to think that it could be considered an efficient means to manage wildlife.

I understand that much of the area being targeted is located near a Wildlife Preserve specifically allocated to preservation of wolves and other wildlife and is off limits to the eradication efforts. We know that the territorial habits of wolves take them many miles. Consequently, efforts within one area are useless because of their migration beyond the off-limits area.

Please reconsider this inhumane plan that will make the state of Alaska look to be carrying out atrocities.

Thank you for your time and for consideration of someone outside Alaska who cares profoundly about Alaska's wildlife as part of the nation's natural treasures.

Sincerely,



Scherel Carver



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

October 22, 2011

As a resident of the Kenai Peninsula, I am submitting my comments on the proposed aerial wolf hunting on the Peninsula. These are propositions 35 and 36, affecting game units 15A and 15C.

Let me first express my disappointment that the meeting concerning predator control on the Kenai Peninsula is being held in Barrow. This makes it difficult if not impossible for those of us who live in the affected area to attend. I don't know the reasoning for this, however, it seems a good way to keep those most affected and concerned from participating in the decision.

I am opposed to aerial hunting of wolves for several reasons.

1. The moose population in area 15C is not declining. Therefore there is no reason to control predators. It is a waste of time and money to do so.
2. Predators are not the cause of moose population declines – overhunting is the main reason. The moose population can be better controlled by revising hunting regulation.
3. There are very few people who need to subsistence hunt for moose for survival on the Kenai Peninsula. Most hunting is done for sport, and there is often much waste. Here again, a look at the hunting regulations would provide better management of the moose population, rather than allowing those who can shop for food at Wal-Mart, Safeway, or Fred Meyer to “subsistence hunt.”
4. Much of the moose population decline on the Kenai Wildlife Refuge is due to poor moose habitat. The forest succession is part of a natural process in which some species benefit and some do not. It is a cycle that will be played out regardless of whether wolves are hunted by humans. Once again, it would be a waste of life, money and resources to permit aerial wolf hunting. It would not alleviate the problem.
5. Predator and prey populations are also cyclical. From time to time, moose populations will decrease for one or more reasons (as in no. 4). Shooting wolves will not only have no affect on the cycle; but worse, it will interject another piece that will interfere with the natural cycle. Predators play an important role in culling the weak and sick, and allowing the prey population, in this case moose, to become stronger.
6. The Kenai Wildlife Refuge is used by many people for recreational activities year round. People come from within and outside the state of Alaska. Aerial shooting of wolves will undoubtedly have a deleterious effect on the numbers of people willing to spend their time and dollars on the Kenai Peninsula.
7. Last, and most important to me on a personal basis, is that I DO NOT want wolves being shot in my backyard. They are a part of the “big picture” of the ecosystem, and human interference will only result in unbalancing a precarious situation.

Thank you for considering my comments. I hope that next time a meeting will be scheduled in the area that is being affected by the policy.

Sincerely,

Kathy East, MS
1610 Silver Pines Rd.
Kenai, AK 99611

907-398-5440



RECEIVED
OCT 24 2011
BOARDS

Patricia Cue
PO Box 143
Homer, AK 99603

October 16, 2011

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 Board of Game:

I am writing in opposition to the proposed aerial wolf hunting on the Kenai Peninsula. I have lived on the Kenai Peninsula for over 20 years, am a property owner, a voter and a conservationist. Specifically, the reasons for implementing the aerial wolf hunt have no basis in fact or reality.

Biological studies indicate that the lack of fire and then appropriate browse are resulting in low moose numbers. Moose are starving as a result. It has nothing to do with over predation by wolves. Why would the Board of Game make a recommendation when the real cause is poor habitat?

Other considerations include moose/vehicle mortality. According to the sign boards posted on the Sterling Highway, close to 300 moose were killed last year as a result of being hit by motor vehicles. Aerial hunting of wolves would in no way solve this serious problem.

Over harvesting of bulls by people is another reason for low moose populations. People take more of the resource than what is available either through legal or illegal (poaching) means.

I suggest that Alaska Department of Fish and Game focus on the biologically sound solutions for low moose numbers. These include controlled burns to improve habitat, clearing of roadsides to give moose more opportunity to walk and so people can slow down when approaching them and greater enforcement of hunting regulations and limiting hunting when populations decline.

Finally, the Board of Game recommendation to consider aerial wolf hunting is an example of a strategy that is poorly researched and lacking in understanding of the biological processes that are integral to maintaining a healthy ecosystem. I am sending Governor Parnell a copy of this letter asking him to please consider addressing the lack of balanced decision making by the Board of Game. Recommending aerial wolf hunting on the Kenai Peninsula is a divisive and one sided approach to a problem being experienced by all Kenai Peninsula Borough residents. It creates hard feelings toward the State of Alaska whose responsibility it is to bring together scientifically based data and to avoid the knee jerk response now being proposed.

Patricia Cue


cc Governor Sean Parnell



59959 Skyline Drive
Homer, AK 99603

October 20, 2011

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

RECEIVED
OCT 25 2011
BOARDS

Dear Board Members:

RE: Proposals 35--Aerial Wolf Control in GMU 15A

I am opposed Proposal 35 and urge the Board to vote it down. This controversial proposal would implement an Intensive Management Plan in Unit 15A through aerial wolf hunting.

First, I am asking the BOG to postpone this proposal discussion until the January meeting in Anchorage for two reasons. 1. The proposal plan was released late to the public thereby reducing the time for full public participation. 2. Hearing a controversial plan that will profoundly affect the Kenai Peninsula in Barrow rather than Anchorage limits public participation. There is no emergency.

I have read the proposed plan for 15A and followed this issue in the news media. Clearly, habitat is the limiting factor in the moose population decline. Scientific studies have verified that poor habitat is depressing population and it is not predators that are reducing the bull:cow ratio. To conduct an aerial wolf control program is unwarranted and unscientific. The program would be slaughtering one species to make more moose which would then likely die of starvation. This is not only poor management but is also fiscally irresponsible!

The plan should be putting forth intensive habitat management proposals with a schedule that allows the habitat time to recover and improve. This is a more sensible approach since it would directly address the problem that is causing the low moose numbers. State biologists should work with Kenai Refuge biologists to determine how best to improve moose habitat. The 1969 fire was a real boon to moose but it has long since grown past its prime benefits for that species.

Furthermore, I have real concerns about the safety of aerial wolf hunting in this populated GMU. Aerial shooting and land and shoot methods are both difficult to oversee when members of the public are issued permits to use these controversial methods. Both are open to abuse and with tight budgets, adequate oversight is very unlikely.

Finally, the proposal to implement predator control in 15A should not go forth because it is likely this program will not be effective because the habitat is inadequate and predator control is not supported by the scientific data. It is the habitat, not the predators that needs to be addressed. I hope the Board will look at the data provided by ADF&G biologists and correctly conclude that this proposal is not warranted or supported by the Intensive Management Law.

I urge you to not adopt Proposal 35.



RE: Proposals 36--Aerial Wolf Control in GMU 15C

I am opposed to Proposal 36 and urge the Board to vote it down. This controversial proposal would implement an Intensive Management Plan in Unit 15C through aerial wolf hunting. I am strongly opposed to aerial wolf hunting in 15C.

Please postpone discussion until the January meeting in Anchorage for two reasons. 1. The proposal plan was released late to the public thereby reducing the time for full public participation. 2. Hearing a controversial plan that will profoundly affect the Kenai Peninsula in Barrow rather than Anchorage limits public participation. There is no emergency.

I ask that the Board defer to ADF&G's previous recommendation that this GMU not be placed under a plan for Intensive Management as it was not biologically necessary. They admitted that they did not do an adequate job managing the hunting of moose, so too many bulls were taken. Hence the decline in the bull:cow ratio. It is also likely that poaching is a factor as well. This might even be an under estimated problem in many of the units where IM has been implemented. This information should have been spelled out in the current plan. The take by hunters has to be part of the equation. When the number of moose killed by hunters is under counted or there is illegal take, this information must be part of the discussion rather than just blaming the problem on predators.

ADF&G has already taken steps to correct the problem with taking too many bulls by limiting the take this year. This is an appropriate and fiscally responsible step to take in improving the bull:cow ratio and increasing the population.

Unit 15C is used by a diversity of recreation groups and also has a lot of remote cabins. Safety is a concern in parts of the Unit. It is also likely that wolves would be shot from the air and then not be able to be retrieved due to unlandable terrain. The wolf pelt would then be wasted, which should not be lawful given that this is a valuable animal. Wolves are considered valuable fur bearing animals and are supposed to be managed sustainably. Killing most of the local population in an aerial hunt is not a sustained yield methodology.

This divisive and controversial plan might have a detrimental effect on Kenai Peninsula tourism, particularly on visitors from outside of Alaska. The Kenai Peninsula depends on tourism for a good deal of its economic productivity. We do not need a black eye over unjustified and controversial aerial killing of wolves.

There is no emergency to kill wolves in GMU 15C. ADF&G let too many moose be taken and has no real estimate of how many moose are poached. Despite this, the moose in this Unit are doing rather well and the temporary restrictions were appropriate for the problem.

Instead of spending a lot of money on an unnecessary and controversial wolf control program, put the money into the local GMU budgets so the biologists can do more field work and actually get the needed information to manage wildlife scientifically. Put more money into Fish and Wildlife Protection so we can stop the illegal take. These measures would make far more sense than aerial wolf hunting.

Please, do not adopt Proposal 36.

Sincerely,
Nina Faust
Nina Faust



RECEIVED

OCT 25 2011

BOARDS

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

10/19/2011

I have been in Alaska since 1975 and this issue is still hanging around. I was disgusted then and I am still disgusted today that you are still trying to take nature into you own hands and declare that by slaughtering wolves, this will solve the "problem" of a declining moose population. Surely you are not heeding the facts that:

Bulls have been over harvested in 15C. As a result, the Board had to temporarily reduce harvest of bulls. During the March meeting, the Board and state biologists recognized that this closure was only temporary.

The biological evidence presented by ADF&G at the March meeting demonstrated that predation was not the cause of moose population concerns on the Peninsula.


If wolf predation is not the problem, it makes no sense to kill wolves.

Why are you doing this? From the other side of the coin your intentions may seem good but in practicality, you are slaughtering wolves. Who in their right mind can find anything right about that?

I assume everyone on your board would be able to load a gun and go right up to a wolf and shoot it in the head. Right? If you can't do that then you are a hypocrite and should move on.

Please ask yourself this; Would I be able to shoot an unsuspecting wolf in the head, hopefully killing it instantly, or God forbid only injure it and make it suffer until you can finish "the job"? If you can do that then go for it. If you can't, you're doing the wrong thing.

Puzzlingly,


Jerry Olive
PO Box 2363
Seward, Alaska 99664

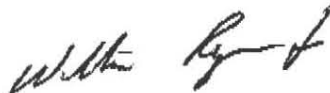


William Regan
Po Box 208
Naknek Ak 99633
October 27, 2011

Board of Game comments
Alaska Dept. of Fish and Game Board support section
Po Box 115526
Juneau Ak 99811-5526 Fax # 907-465-6094

As the Co-Chair for the Naknek Fish and Game advisory committee, I am writing this in favor of implementing the Intensive management plan in unit 9. We have for years been working to get our predation problems worked on, we would like to have this implemented as soon as possible for the caribou #s are down as well as moose. We have not been able to hunt the Alaska Peninsula herd in over 10 years and now the Mulchatna herd is moving in others directions. The people of our communities would like to see Wolf and bear numbers down so the herds can rebuild. We need to act to bring our caribou back from the brink that they are at.

William Regan



To: BOG

OPPOSE: Proposals 35 and 36 for
Game Management Units 15A and 15C

In your intense need to gun down something
from an airplane, why don't you gun down the creatures
who are really responsible for any prey depletion
that might be going on: HUMANS!

Your game management recommendations
are extremely horrible.

Diane Ragana
Anchorage



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

October 27, 2011

To the Board of Game,

I am adamantly against adopting proposals 35 and 36 on the Kenai Peninsula for a number of reasons as stated below.

1) As stated by ADF&G and many other biologists, the decline in moose numbers in areas 15A and 15C is not a predation problem but rather a habitat problem. For this reason alone, proposals 35 and 36 do not address the problem of declining habitat and cannot be supported. Degradation of habitat has far reaching effects. Not only does it affect the game in which the Board seems to be concerned about, but it affects the biological diversity that is integral in maintaining a balanced and healthy spectrum of wildlife from fish, waterfowl, other bird populations, caribou, beaver, fox, and other land animals. Once the vegetative habitat that supports a spectrum of wildlife (including moose) is degraded, the long term effects take much longer to recover than any single predator population. The effects could take decades rather than the short time it would take for the wolf population to come back. Degradation of the habitat due what is occurring now (development, lack of fires, loss of spruce trees with the resulting succession of blue joint grass, overbrowse from moose, etc.) is well on its way to creating a much larger and longer term problem.

It is obvious in the State established Critical Habitat Area north of the Homer Airport and along the Anchor River, that the overbrowsed vegetation no longer provides the needed browse it once did, and unless something is done to mitigate that, it will be lost for decades due to the succession of the Calamagrostis Canadensis grass. With increased recreational snow machine use crisscrossing these areas all winter long, the 'habitat' is just about in name only. There is no regenerating moose browse to speak of in the southern peninsula habitat due to continual overbrowse. The carrying capacity has been reached and without a concerted effort in doing something about it, it is in danger of not coming back, resulting in a permanent decline in the moose population.

Streams in the southern peninsula show rising water temperatures, affecting the health of fish habitat. Studies in Yellowstone and in Zion show that overbrowsed vegetation in riparian corridors contribute to decreased shade in these areas, thus affecting water temperatures and resulting fish populations. ADF&G is responsible for maintaining game and fish habitat.

Decreased rates in moose twinning births is another warning that nutrition/habitat is compromised. It has nothing to do with a 'predator problem'. Considering the state of the current degraded habitat, it makes more sense to cull moose to bring their numbers more in line with available habitat, not what the BOG is proposing, which will only ensure more moose starvation and long term habitat decline.



- 2) The science based studies in progress right now have not been completed so it is premature to act on a predator control program with out having accurate information from which to act on. It is simply irresponsible, fiscally and biologically, to act this prematurely.
- 3) Increased off road motorized vehicle use presents another factor in stressing moose an already stressful time during the winter months, which adds another factor to winter mortality.
- 4) High numbers of year round vehicular/moose collisions do not seem to have been factored into the equation of declining numbers.
- 5) Managing public lands for one species is short sighted, irresponsible and reckless. Managing public lands as a ranch for a single species of game, without consideration for the very habitat this single species needs to survive, will only result in more winter starvation and reflects an even greater degree of irresponsibility and recklessness on the State's behalf.
- 6) These plans were not released in a timely manner and proposed to be discussed in Barrow, greatly narrowing the affected public's ability to participate.
- 7) The logistics of carrying out proposals 35 and 36 are frightening to think about in that untrained private individuals shooting from their private fixed wing planes are not going to endanger the public using public State lands recreationally or otherwise. It is a scenario hard to fathom and shows a lack of responsibility or respect towards other rightful users of these public lands. Having agents of the State flying around in, and shooting from, helicopters during the same daylight hours that the public will be recreating in these same areas is disturbing to say the very least.

And lastly but not least,

7) Area 15A is mostly Federal land, which then makes one question the real motivation of proposing a 'predation management plan' where the State does not have authority. It leads to the suspicion that the State only wants to do battle with the USF&WS. This has fiscal ramifications the public needs to understand. Costly lawsuits and wasted staff time are only the most obvious expenditures the State will incur. In these difficult economic times, this is an especially irresponsible and costly side show to take on when we have far greater needs in this State than to fight the Federal government in pursuing a very flawed policy to begin with. Fast tracking these proposals, out of cycle, before the ADF&G has completed its studies, and discussing the proposals in Barrow, far away from the affected geographic areas is disingenuous and damaging. **This looks like a political agenda, not a biological one. It is fiscal a black hole and extremely irresponsible.**

Sincerely,

Rika Mouw

Rika Mouw

Homer, Alaska

P.O. Box 4084
Homer, AK 99603
907 235-7455



TO THE ALASKA BOARD OF GAME

Arctic and Western Regions

November 11- 14, 2011 meeting

PROPOSAL 10 – OPPOSE

I oppose this proposal. Killing moose at a salt lick in Unit 18 is akin to the use of bait in the take of a prey species and should not be allowed.

PROPOSAL 12 – OPPOSE

I oppose this proposal. Allowing moose to be shot from a boat under power should not be allowed. The justification for PROPOSAL 10 contradicts the justification for PROPOSAL 12. PROP 10 justification states a salt lick should be allowed to attract moose in Unit 18 in order to save hunters money on gasoline, then the same author wants to be allowed to use a boat under power – using gasoline – to shoot moose.

PROPOSAL 11 – OPPOSE

I oppose this proposal. The use of electronic calls in Unit 18 to attract moose should not be allowed. The author states relaxing methods and means makes sense “when the floodgates for season are opened”. Relaxed moose season timeframes and moose bag limits in Unit 18 are hardly justification for an anything goes policy.

PROPOSAL 35 – OPPOSE

I oppose this proposal. Aerial wolf control on the Kenai Peninsula makes absolutely no sense. ADF&G has stated predation is not the reason for low moose numbers. Rather, poor habitat quality has been cited for fewer moose in Unit 15A.

PROPOSAL 36 - OPPOSE

I oppose this proposal. Aerial wolf control on the Kenai Peninsula makes absolutely no sense. ADF&G's own data shows moose numbers are not declining. Rather, there is a low bull moose to cow moose ratio. Seems like ADF&G should be looking at better management of hunting bull moose.

I have lived in Alaska for 33 years and have seen a steady erosion of sound wildlife management policies. These proposals underscore that decline.

Thank you for your consideration.

Marilyn Houser

2411 Ingra Street

Anchorage, AK 99508

10/28/2011



Lisa Climo
34268 Nugget St
Anchor Point, AK 99556

RECEIVED
OCT 24 2011
BOARDS

Board of Game Comments
Alaska Dept of Fish and Game
PO Box 115526
Juneau, AK 99811-5526

October 18, 2011

To Alaska Board of Game members:

I am writing in regards to proposal numbers 35 and 36 which would allow aerial wolf control in Units 15A and 15C. I see no biological justification for aerial wolf control in either game management unit. In Unit 15A, research has shown that poor habitat quality is affecting the nutritional status of cow moose and consequently calf production. Management in that Unit should focus on improving habitat quality through the use of controlled burns rather than on predator control within the small area outside of the Kenai Wildlife Refuge where aerial hunting isn't prohibited. In area 15C, it is my understanding that stricter moose hunting regulations have already been effective in meeting the management objectives for moose population and harvest numbers. Furthermore, wolf population size and distribution in Unit 15C is not well known, which argues against the wisdom of aerial hunting of these animals. Aerial wolf control in either of these management units is unnecessary, ill-advised, and would almost certainly be ineffective in achieving or sustaining moose population objectives. I urge you to reject proposals 35 and 36.

Sincerely,



Lisa Climo



October 28, 2011

Attn: Board of Game Comments
Alaska Dept. of Fish and Game
Board Support Section
PO Box 115526
Juneau, AK

Dear Board of Game Members:

Thank you for the opportunity to comment on Proposals 35 and 36. As a resident of the Kenai Peninsula, I am writing to ask you to OPPOSE Proposals 35 and 36.

Proposal 35 – Oppose for the following reasons:

1. GMU 15A has a habitat problem, NOT a predator problem. The targeting wolves is arbitrary, unscientific, unwarranted and will not result in higher moose populations.
2. The IM plan was only recently published for public review and didn't allow adequate time for review and public comments.
3. The location of the meeting in Barrow disenfranchises many if not all of the residents from attending and testifying at the meeting where this mater will be decided.

Proposal 36 – Oppose for the following reasons:

1. The moose population in 15C remains within Intensive Management (IM) objective.
2. Our local Advisory Committee (AC) recently voted "9 to 1" AGAINST this proposal.



Page 2 – Oppose Proposal 36 comments continued:

3. The low bull/cow ratio is a result of overhunting of young bulls which is negatively impacting population productivity, not predation by wolves.
4. The IM plan was only recently published for public review and didn't allow adequate time for review and public comments.
5. The location of the meeting in Barrow disenfranchises many if not all of the residents from attending and testifying at the meeting where this matter will be decided.
6. Aerial predator control on the Kenai Peninsula is simply not practical. The forested terrain makes tracking and shooting the wolves difficult. Landing a plane, in order to salvage a carcass or dispatch a wounded animal, is problematic and dangerous.

Thank you for your consideration of my comments.

Sincerely,

Dave Bachrach
P.O. Box 2828
Homer, Alaska 99603



October 28, 2011

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


I am STRONGLY OPPOSED to BOG proposals 35 and 36 for aerial wolf control on the Kenai, in Game units 15A and 15C.

This is a densely populated area used heavily for recreation. This kind of action is inappropriate, unwarranted, and dangerous.

There is no scientifically valid reason to expect that this will increase the moose population. These proposals are absurd.

Please defeat these proposals.

Thank you.



Robert Schlesinger



LAW OFFICE OF KNEELAND TAYLOR, P.C.

425 "G" Street, Suite 610
Anchorage, AK 99501
907-276-6219 telephone
907-258-7329 FAX
e-mail: kneelandt@alaska.com

October 28, 2011

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

Re: Proposals 35 & 36: Oppose: Predator control Kenai Peninsula

To the Members of the Board of Game:

I oppose proposals 35 & 36 which provide for predator control on the Kenai Peninsula.

I find particularly objectionable:

1. The proposals apparently provide for control by persons not employed by the ADF&G. If predator control is to be conducted, ADF&G employees, preferably biologists, should do the killing.
2. There is no emergency threatening moose or other wildlife, or people.

Very truly yours,


Kneeland Taylor



October in preparation and the Board will be considering the Proposal sometime during the November 11-14th meeting and none of the other conditions of AS 44.62.190(a)(1)&(2) have, apparently, been complied with, the Board is prohibited from making any decision on the Proposal at the November Board meeting. In addition, in the Alaska Department of Fish and Game's (ADF&G') rush to complete the Proposal, the proposal has been insufficiently developed and was not even included in the ADF&G's November proposal book. This prevented the BOG, Advisory Committees and the general public from being able to review the Proposal in a sufficient amount of time and has contributed to a substantial amount of confusion relating to understanding the scientific basis for the Proposal. The BOG has, further, prevented me and other interested members of the public from participating in the November meeting by holding the discussion and decision on the Proposal in Barrow far from the communities that will be directly affected.

The failure of the BOG to acknowledge the need for public participation in such a controversial proposal is detrimental to the public process and a violation of state law. I, therefore, request, at the very least, that consideration of the Proposals be moved to the January meeting in Anchorage in order to allow for my participation and that of individuals who will be directly impacted by the Proposals.

II. Wolf control is not biologically warranted, appropriate, or feasible in Units 15A or 15C.

Rather than wolf predation, biologists recognize that habitat is limiting moose population growth in both 15A. The Proposal, itself, states "declining habitat quality is the main limiting factor affecting low moose densities in Unit 15(A); there has not been a fire of significant size in the unit for over 40 years." Further, ADF&G recognized that the current moose population objectives for 15A were too high as illustrated by a proposal recommending the moose population objectives be lowered was submitted by ADF&G for the March BOG meeting. Despite extensive biological evidence that such a reduction was necessary, the BOG rejected the proposed reduction in objectives. Due to the widely recognized habitat limitations in 15A, ADF&G also stated that "if predator densities were reduced to increase moose numbers without concomitant wide-spread improvements to the habitat any increases to moose survival would further increase the nutritional stress of the moose population thereby reducing productivity."

That habitat, rather than predation, however, is limiting moose population growth in 15A is illustrated by ADF&G, itself, which provides, in the Proposal that habitat is limiting the population as illustrated by data presenting poor nutritional condition. Further, the original habitat plan for this program states that bull: cow ratios have been stable since the 1990's (see proposal 174). Reducing calf mortality through control of wolves, in the hopes of improving the bull: cow ratio when neither low bull: cow ratios, nor excessive calf predation, have been identified as limiting factors is scientifically unfounded.





Similarly, as in the case of 15A, implementing aerial wolf control in Unit 15C is not supported by current biological conditions. For this reason, ADF&G recommended "Do Not Adopt" for March meeting proposals 172 and 173 which called for aerial taking of wolves in all of Unit 15 under intensive management. The agency's rationale was that "Unit 15C is currently within intensive management objectives for both population size and harvest."

Not only is there insufficient scientific basis for the Proposal, but there is a substantial question as to whether it will even work at all. The Proposal, itself, provides that "reducing predation will allow for *possible* reallocation of moose from predators to harvest..." Similarly, the only thing that remotely resembles a scientific bases for the Proposal is "the *potential effectiveness* of aerial wolf control." This means that the Proposal is not even remotely based in science and is almost entirely based in politics.

The Proposal is further flawed by it's complete failure to study the impacts of reducing wolf numbers on the wolf population itself. This is particularly true since the Proposal will be largely ineffective in increasing moose populations until habitat conditions improve and will have to be repeated in future years to have any measurable impact on such populations at all, let alone to reach the BOG's objectives.

Finally, the Proposal fails to address the likely further decline of habitat necessary to produce healthy moose populations if wolf populations are reduced in 15A and 15C. This is based on numerous studies illustrating that wolves are key species in the health of ecosystems and, therefore, populations of moose and other ungulates. Wolves are a keystone predator, and as such, is an integral component of healthy functioning ecosystems. The admission on the one hand of the ADF&G, itself, that habitat is the major factor that is limiting moose populations but, completely, failing to even mention maintaining the healthy numbers of wolves in 15A and 15C as a means of addressing such habitat issues on the other, illustrates the complete lack of sound science upon which the Proposal is based.

Conclusion

The fact that the ADF&G, itself, expressly admits that habitat degradation due to lack of fire and other factors, is the primary cause of Moose populations that are not meeting the BOG's arbitrary levels of for Moose population objectives and ADF&G's statement that controlling wolves has a mere "possibility" of increasing moose populations, illustrates that the Proposal is highly unlikely to meet BOG objectives. Further, the fact that it will likely require multiple control applications which will result in the removal of a keystone species that is necessary to improve moose habitat conditions, means that the Proposal will, actually, negatively impact both moose and wolf populations over the long term. This proposal is best illustrated by the words of one ADF&G representative at the Homer Advisory Committee meeting who said, "the BOG directed ADG&G to increase moose populations as quickly as possible" which illustrates that this proposal has nothing to do with science and everything to do with politics.





Please contact me if you have any questions regarding these comments.

Sincerely,

Hal Shepherd
P.O. Box 15332
Fritz Creek, AK 99603
(907)299-8821

cc: Commissioner of Fish and Game
Mead Treadwell, Lieutenant Governor of Alaska





United States Department of the Interior

NATIONAL PARK SERVICE

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

IN REPLY REFER TO:

L30 (AKRO-SUB)

October 27, 2011

Mr. Cliff Judkins, Chairman
Alaska Board of Game
Board Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Judkins:

The National Park Service (NPS) appreciates the opportunity to comment on the Arctic & Western Regions' proposals being considered by the Alaska Board of Game (BOG) at the meeting on November 11–14, 2011, in Barrow. There are 19 proposals, 7 of which we are commenting upon that affect NPS areas in these regions. 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.

Our specific comments follow:

Proposals #22, 28 & 31 Support (Affects GMU 22C, 22D, 23, & 26A)

These proposals reauthorize antlerless moose seasons. We support continued reauthorization of antlerless moose seasons where moose populations are healthy. Proposal #22 affects NPS lands in Unit 22D within Bering Land Bridge National Preserve. Proposal #28 affects NPS lands in Unit 23 within Bering Land Bridge, Noatak and Gates of the Arctic National Preserves. Proposal #31 affects NPS lands in Unit 26A within Gates of the Arctic National Preserve.



Proposal #23 Oppose (Affects GMU 22, 23 & Moose hunts in GMU 12, 21 & 24)

The Board of Game has asked the Department of Fish and Game to review the discretionary authority requiring the nullification of trophy value of animals taken under a State subsistence permit. The proposed changes affect NPS lands in Bering Land Bridge, Gates of the Arctic and Noatak National Preserves.

Our comments fall into three areas as outlined below: 1) public process and input, 2) potential biological and management consequences, and 3) impacts to the Department's ability to best manage these hunts.

1. While the regulation (5 AAC 92.052) has statewide scope, its direct effects are on specific hunts, species, and areas. NPS believes that the appropriate place to address these questions is within the Board Cycle. This allows for better public notice and provides a better opportunity for the Board to hear from a broader range of users within the affected region.
2. Under circumstances that involve a high statewide demand animal or pose special management concerns, trophy nullification is among the most effective ways to distinguish if a hunter is truly harvesting for subsistence. Trophy nullification ensures that the subsistence character of the hunt is maintained and the subsistence opportunity is protected.

The Seward Peninsula Tier I registration muskox hunt is one such case. The muskox population is currently exhibiting trends of concern in some hunt areas including declines in mature bull-to-cow ratios, recruitment, and a decline in overall average annual population growth. Removal of the trophy nullification requirement may increase hunter demand and success. This may result in a trend of decreasing allowable harvest levels and shortened seasons. The 2010-2011 hunt year for muskoxen in GMU 23 Southwest (the Buckland/Deering area) needs to be carefully considered. Compared to the previous year (2009-2010), the allowable harvest was reduced by 50% and the effective subsistence season was shortened by emergency order closure from 7.5 months to 12 days when the allowable harvest was reached. Additionally this may increase the incentive to remove some of the most valuable genetic investment (i.e. the largest bulls) to the herd.

3. The NPS would prefer to see trophy nullification retained as a discretionary management tool for the Seward Peninsula muskox hunt. The NPS also advises the Board not adopt regulations restricting subsistence hunters to cows and immature bulls as it appears contrary to subsistence practices and may result in adverse biological impacts to the age and sex structure of the population. As an alternative, the NPS would prefer to retain a flexible cooperative management strategy with the State focused around conservative harvest rates, discretionary authorities and permits conditions, and increased monitoring of the composition of the muskox population. We believe such a strategy would have the best chance of continuing to provide opportunity to the widest range of users while providing



for subsistence needs. We would also note that the NPS has been supportive of the current regulatory framework that allowed a drawing hunt to be established in GMU 22E based on the proportion of the mature bulls in the population. The difference between the existing framework and Proposal # 23 is that the existing framework does not prohibit subsistence users from harvesting mature bulls.

Finally, given the often complex issues and situations surrounding some of these hunts where subsistence hunting is a factor, trophy nullification at the discretion of the Department remains one of the more flexible tools available to the Department. NPS believes Department staff in cooperation with Federal agencies is in the best position to determine whether or not to apply it as a management tool.

Proposal #26 Oppose (Affects GMU 22)

The proposed year round open season potentially could be detrimental to brown bear populations on NPS managed lands in Bering Land Bridge National Preserve. Given the substantial increase in the harvest since 1998, and lack of measurable harvest objectives, population abundance information, and meaningful indices to measure harvest effect, establishing a year round open season has the potential to create a conservation concern. Should the Board adopt this proposal, we urge the Board to exclude NPS lands in 22B, D and E, and that the season remains August 1 – May 31.

Proposal #27 Support (Affects GMU 22)

This proposal adds 22 days to the GMU 22 ptarmigan season by starting the season on August 10 rather than the existing September 1 date. Affected NPS lands are in the Bering Land Bridge National Preserve. The proposed regulatory change aligns the State and Federal seasons. There are no expected conservation concerns.

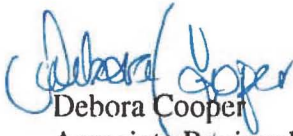
Proposal #33 Oppose (Affects GMU 26)

This proposal increases the lengths of the resident and nonresident wolverine seasons by 31 days, establishing an August 1 – March 31 season. The current State and Federal hunting seasons are aligned; this proposal will take the seasons out of alignment and create regulatory confusion. It also may increase harvest in an area where little information is available. If the State season is extended we suggest consideration of monitoring the sex of animals harvested and keeping female harvest <30% as a conservation measure. More population density information and harvest data are needed to ensure healthy population thresholds in Gates of the Arctic and Noatak National Preserves. Should the Board adopt this proposal, we request the Board to exclude NPS lands in GMU 26.

Again, 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 or your staff have any questions please contact Debora Cooper at (907) 644-3505 or Dave Mills at (907) 644-3508.



Sincerely,



Debora Cooper
Associate Regional Director for Resources and Subsistence

cc:

Cora Campbell, Commissioner, ADF&G
Corey Rossi, Director, Wildlife Conservation, ADF&G
Kristy Tibbles, ADF&G
Pat Pourchot, Special Assistant to the Secretary for Alaska
Geoff Haskett, Regional Director, FWS
Chuck Ardizzone, FWS
Joel Hard, Superintendent, Lake Clark NP&P
Ralph Moore, Superintendent, Katmai NP&P
Paul Anderson, Superintendent, Denali NP&P
Rick Obernesser, Superintendent, Wrangell-St. Elias NP&P
Frank Hays, Superintendent, WEAR
Jeanette Pomrenke, Superintendent, BELA
Greg Dudgeon, Superintendent, Yukon-Charley Rivers NPes/Gates of the Arctic NP&P
Susan Boudreau, Superintendent, Glacier Bay NP&P
Debora Cooper, Associate Regional Director
Dave Mills, Subsistence Team Leader
Sandy Rabinowitch, Subsistence Manager
Chris Pergiel, Chief Law Enforcement Officer, NPS-Alaska Region



FROM:

Gerald R. Brookman
715 Muir Avenue
Kenai, Alaska 99611-8816
(e-mail: brookman@alaska.net)

TO:

Alaska Board of Game
BY FAX: (907) 465-6094

SUBJECT:

Proposals 35 and 36 to be considered at BOG Meeting in Barrow, November 2011

I am writing concerning Proposals 35 and 36, to authorize aerial hunting of wolves in Game Management Units 15A and 15C.

To take action on this matter at a meeting in Barrow, far removed from the affected area, is wrong and makes no sense. The matter needs full consideration by persons directly affected by the proposal, those living on the Kenai Peninsula. Therefore, you should postpone taking any action on the proposal at least until the January BOG meeting in Anchorage.

I am a 54-year resident of Alaska, and a 33 year resident of Kenai. I have successfully hunted moose on the Kenai Peninsula and I feel strongly that aerial wolf hunting is not a proper management tool for these animals.

Sincerely,

Gerald R. Brookman



Science Now Project

October 28, 2011

Alaska Board of Game
c/o Alaska Department of Fish and Game
Board Support Section
P. O. Box 25526
Juneau, AK. 99802

Attn: Scott
BOG Arctic Western
Nov 20 11
Public Comments

RECEIVED

OCT 28 2011

BOARDS
ANCHORAGE

RE: NPCA Comments for the 2011 Arctic / Northwest Region Board of Game Meeting

Chairman Judkins and board,

The Science Now Project appreciates the opportunity to comment on the following proposals:

1. Proposal 35A – Opposing the IM Plan for GMU 15A
2. Proposal 36A – Opposing the IM Plan for GMU 15C

The proposed predator based intensive management plans for GMU 15 are not based on recognized scientific principles.

The ADF&G did not request a predator based intensive management plan in GMU 15 for the following reasons:

1. Predator based intensive management will not be effective. Habitat enhancement based intensive management will be.

The USFW has a management mandate to maintain a “natural” ecological process in the refuge. We have a strong position in working with the USFWS to enhance habitat by promoting multiple, small scale, controlled burns in both subunits.

The Board of Game does not have the privilege under the intensive management law of adopting an intensive management plan that simply will not work.

2. The state has not published a feasibility determination for either intensive management plan.

Approving of the plan prior to the publishing of a feasibility findings and allowing the public to comment on the findings, ***preferably at a regularly scheduled south central Board of Game meeting***, is putting the cart before the horse.



3. Habitat quality is the overwhelming issue contributing to low moose densities in both subunits.

The residents of Alaska have made a policy decision based on social preference to restrict natural fire regimes on the Kenai Peninsula, the very component that produced the high quality habitat, and high density moose numbers, of the past. There is nothing wrong with that decision, but, the hunting community can't have their cake and eat it too so to speak. Nor does the consumptive community have the right to artificially reduce predators to an extremely low density at the expense of all other user groups that consider healthy predator populations a high priority on the Kenai. As well, it is inappropriate for the Board to ignore the science and approve of a predator reduction plan.

We should focus on finding a solution to the "no burn" policy of the USFWS and the state of Alaska. Controlled burns on a small scale, at the right time of year, will not only be far more effective at achieving the goal of higher moose densities, it will also allow the ecosystem as a whole to maintain its natural population densities and diversity, which is essential for the long term health of the landscape as a whole.

4. Twinning rates indicate habitat is the limiting factor on moose densities.
 - a. 15A – 16% twinning rate;
 - b. 15C – 30% twinning rate

There simply is not the food available to feed more moose. The carrying capacity of the environment is at the upper threshold. Exceeding that limit is widely considered a very ill advised management decision.

Currently, the ADF&G lack:

- a. Current moose calf mortality data indicating wolves are responsible for low moose densities;
 - b. Current habitat analysis with a carrying capacity estimate for moose and caribou based on direct habitat study.
5. Artificially increasing the moose density beyond the carrying capacity of the environment would significantly increase the risk of a substantial population decline due to severe winter conditions, such as high snow depth.
 - a. 15C – preliminary state habitat analysis in this area suggests that the region is shifting from high quality moose habitat (willow) to lower quality habitat (grasslands). This



may be driven by climate change, but clearly indicates that habitat quality, not predation, is the driving factor limiting moose density.

- b. 15C – a recent large wildfire in this region is poised to “release” and potentially produce higher quality moose forage. The benefits of this fire have yet to be realized.
6. The most current calf mortality data (1983) indicates wolves are responsible for only 6% of first year moose calf mortality.
 - a. 15A – State lands available for aerial wolf harvest is only 100 mi². This limited area will not result in any appreciable wolf harvest number or increase moose calf survival at any appreciable level.
7. The board has recently adopted extremely liberal hunting and trapping regulation for predators on the Kenai. The impact of those regulation amendments have yet be realized.

The Science Now Project looks forward to working cooperatively with the regional AC's, Board of Game, Federal Subsistence Board, federal RAC's, and the Citizen Advisory Council on Federal Areas to address the limitations to increasing the number of controlled burns and mechanical habitat enhancement projects in GMU 15.

Lets focus on what will work instead putting our heads in the sand and ignoring basic science. Predator based intensive management simply will not reach our goal of high moose densities in GMU 15, indeed, artificially increasing the moose beyond the carrying capacity of the environment may result in a catastrophic moose reduction in the future.

Habitat enhancement is our only option on the Kenai.

Wade Willis
Science Now Project
sciencenowproject@gmail.com
907-223-0218



ATTN: Board of Game Comments

To Whom It May Concern,

I am writing to express my strong opposition to proposals 35 and 36 which would allow for aerial wolf controlling Game Management Units 15A and 15C.

It is my understanding that the Alaska Department of Fish and Game presented firm evidence to BOG that wolves were not the cause of declining moose populations on the Kenai; therefore there is no reason to kill any wolves residing there.

Other factors, such as poor habitat and overharvesting by hunters, are the cause and these causes should be addressed without harming the wolves.

In addition, it is totally inappropriate to even think of allowing aerial hunting in an area that is so heavily used for recreation purposes. I am also strongly opposed to any private citizen with a permit being allowed to shoot wolves from aircraft. This is terribly dangerous to the person, who is not properly trained, and terribly cruel to the wolf who will most likely die a slow and agonizing death.

I also wonder why it is so difficult for the public to provide input on these proposals. The public should have been made aware of these proposals immediately after the March 2011 meetings. Also, to allow more public participation, the BOG should postpone action on these proposals until the January meeting in Anchorage. It is unfair to conduct the meetings in Barrow instead of Anchorage, where those directly affected would have fair access to participate and have there opinions heard.

I strongly urge you to defeat Proposals 35 and 36. Thank you.

Loretta Stadler
307 Freemans Lane
Franklin Lakes, NJ 07417
Lmstadler1@aol.com





National Parks Conservation Association®
Protecting Our National Parks for Future Generations™

Alaska Regional Office . 750 W. 2nd Avenue . Suite 205 . Anchorage, AK 99501
(907) 277.6722 . FAX 907.277.6723 . www.npca.org

October 28, 2011

Cliff Judkins
Chair, Alaska Board of Game
Alaska Department of Fish and Game
Board Support Section
P. O. Box 25526
Juneau, AK. 99802

RE: Support Proposal 30 & Oppose Proposal 34 - 2011 Arctic / NW Region BOG Meeting

Dear Chairman Judkins,

The National Parks Conservation Association (NPCA) is America's only private nonprofit advocacy organization dedicated solely to protecting, preserving, and enhancing the U.S. National Park System for present and future generations. Founded in 1919, NPCA has more than 340,000 members of which about 1,000 reside in Alaska.

Our concern for the impacts of state wildlife management strategies and regulations on lands and wildlife managed by the national park service causes us to offer comments on two proposals.

1. Proposal 30: Support for the Board of Game (BoG) establishing a maximum brown bear harvest objective for Noatak National Preserve, with special attention to the upper Noatak river drainage.
2. Proposal 34: Opposing the reauthorization of resident brown bear tag fees exemptions on lands managed by the NPS.

NPCA continues to be concerned about the long term trend of increasing brown bear harvest opportunities for the sole purpose of manipulating moose populations within the Noatak National Preserve. This has been done by multiple incremental liberalizations of brown bear harvest opportunity in GMU 23 by the Board of Game since the early 1990's that include lengthening the hunting season and increasing the number of bears harvested on an annual basis. Evidence of this is found in the Alaska Department of Fish and Game's (ADF&G) 2009 Brown Bear Management Report:



“Since the early 1990’s, brown bear hunting regulations have been incrementally liberalized in Unit 23 to increase hunting opportunity and reduce predation on moose”¹

This incremental increase in brown bear harvest for the sole purpose of manipulating moose populations directly conflicts with federal management mandates for the National Park Service (NPS).

“The Service [NPS] 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.”²

Simply put, NPS Management Policies do not allow the Board of Game to implement a brown bear reduction program that negatively influences natural population dynamics within the Noatak National Preserve based solely on the assumption that in doing so it will result in an increase in the consumptive take of moose.

In addition to being simply contrary and conflicting with NPS management policies, this increased harvest is having an actual negative impact on the Noatak brown bear population. Current published brown bear harvest rates compared to NPS brown bear population estimates for the Noatak National Preserve indicated current harvest levels are exceeding sustainable rates of harvest based on recognized scientific principles, which recommend a harvest rate of $\leq 8\%$ of the adult brown bear population (≥ 3 years of age).

In its comments against this proposal, ADF&G does not acknowledge the upper Noatak population census work presented to the board by the NPS, which estimated an adult brown bear density of approximately one adult bear / 45.6 mi². Instead, the state relies on a density estimate of one adult bear / 25.7 mi² (Ballard 1991) which was estimated from high quality bear habitat in the Red Dog mine area.

While ignoring the NPS data, ADF&G acknowledges its own concerns about the work of Ballard at Red Dog because **“it is probably unreliable to apply census-generated densities based on high quality bear habitat to the entire Preserve containing lower quality habitats”**. The department clearly acknowledges that the Noatak Preserve likely has a significantly lower bear density than found in the Red Dog mine census study. Ballard also characterized the Red Dog mining area as **“high-quality denning habitat”** that was probably **“not representative of average bear densities in northwestern Alaska”**.

We would strongly argue that ADF&G must include NPS data in its decision making formula. NPS brown bear census data is more representative of bear habitat quality found within the Noatak National Preserve, which gives a more accurate estimate of populations and the subsequent harvest levels that meet NPS standards for a natural population. The NPS brown bear population estimate in the Noatak National Preserve shows us the following:

¹ 2009 Brown Bear Management Report / Page 283

² 2006 NPS Policy Manual Section 4.4.3



Noatak River Drainage (13,000 mi²)

- NPS managed lands: 11,310 mi²
- NPS Brown Bear Density Estimate: One adult bear/45.6 mi²
- Brown adult bear population (NPS managed): 248 brown bears
- Sustainable harvest rate estimate ($\leq 8\%$) : 20 brown bears

In addition to our overall concern that the number of bears being harvested is too high based on population estimates using NPS data, we are concerned that the harvest is being focused on the Noatak drainage. Currently, the highest brown bear harvest rates continue to be in the Noatak River drainage, of which, *87% of the Noatak drainage is managed by the National Park Service.*

Contrasting an NPS sustainable harvest estimate of 20 bears, based on an 8% harvest level, is the historical brown bear harvest rate in Noatak River drainage from 2000 – 2007 of 25 bears per year (range 19 to 38 bears). In addition, the percentage of females in the harvest in all of GMU 23 is increasing from 25 % (1990 – 1999) to 32% (2000 – 2009) with a 43% and 50% rate in 2008 and 2002, respectively. Yet ADF&G continues to promote increasing brown bear harvest rates at this meeting, including in the Noatak National Preserve, by continuing the tag fee exemption (and driving our opposition for Proposal #34):

“Tag fee exemptions are desired [*in GMU 23*] to allow: 1) incremental increase in annual harvest”³

ADF&G’s 2009 brown bear management report confirms that 52% of all brown bear harvest in GMU 23 has occurred in the Noatak River drainage from regulatory year (RY) 1988 to 2007, yet the drainage accounts for only 30 % of the total area of GMU 23.⁴

“As in previous years, more brown bears were reported taken in the Noatak drainage during this reporting period than in any other drainage”⁵

ADF&G also acknowledges that the current brown bear harvest rates, especially the concentrated harvest rates reported along the Noatak River drainage, are being sustained by the out migration (emigration) of brown bears from National Parks and Preserves found within, or bordering, Unit 23 (e.g. the Noatak, Cape Krusenstern, and Gates of the Arctic).

“Heavily hunted portions of the Unit [*GMU 23*] may be acting as “population sinks” where bears, especially boars [*male bears*], are continually replaced by bears from lightly hunted areas ...” (clarification added).⁶

³ Proposal 34 / Page 45 – ADF&G Generated Proposal.

⁴ Game Management Unit 23 is 43,423 mi² / The Noatak River drainage encompasses 13,000 mi² of GMU 23. Historical harvest rates for the Noatak River can be found on page 296 of the 2009 ADF&G Brown Bear Management Report

⁵ 2009 ADF&G Brown Bear Management Report Page 287 - The reporting period is July 2006 to June 2008 (or regulatory year 2006 & 2007).

⁶ 2009 ADF&G Brown Bear Management Report / Page 289

“Where harvesting is allowed and subject to NPS control, the Service will allow harvesting only when ... (2) the Service has determined that the harvesting will not unacceptably impact park resources or *natural processes, including the natural distributions, densities, age-class distributions, and behavior of harvested species*”⁷

The concern about accurate population estimates and overharvesting of brown bears in Noatak is not something new nor is it solely a concern of NPCA. In 2005, the National Park Service advised the BOG that current NPS brown bear population census data for the Noatak National Preserve indicated the brown bear population was significantly below the ADF&G brown bear minimum density management objective for the Noatak River drainage.⁸

NPS brown bear census data, which corroborated other published data (Ballard 1993), indicated the Noatak National Preserve brown bear population was approximately one adult bear / 45.6 mi².⁹ That in turn estimated a brown bear population within the Noatak National Preserve that was 78% below the ADF&G minimum brown bear density management objective at that time.

In response, the ADF&G, using its discretionary authority, amended the 2009 GMU 23 brown bear management report by revoking the Unit 23 brown bear minimum density management objective for estimating populations and replacing it with an objective with a lower level of scientific precision, that being, a harvest sex ratio objective.¹⁰

Instead of addressing NPS's multiple requests (in 2003, 2005, and in 2007) to both stop the increasing harvest levels and to implement a maximum harvest objective, the ADF&G prefers to simply revoke the minimum density management objective completely. This speaks to the request in Proposal #30: Establish a scientifically valid harvest objective using all available data and do it cooperatively with the National Park Service biologists that have significant knowledge of the bears in this area.

“Harvest data alone may be insensitive to changes in brown bear populations. Without census data, human harvests could skew the population sex and age structures and not be reflected in the harvest data.”¹¹

Furthermore, this strategy doesn't appear to be meeting the goal of increasing moose density set out by ADF&G and the Board of Game who have both justified a liberal brown bear harvest strategy in the Noatak National Preserve for the sole purpose of increasing the consumptive take of moose, mainly for trophy hunting in GMU 23.

⁷ 2006 NPS Policy Manual / Section 4.4.3

⁸ 2007 ADF&G Brown Bear Management Report / Page 277 – GMU 23 brown bear management objective for the Noatak river drainage was to maintain a minimum density of one adult bear per 25.7 mi². The NPS conducted an aerial brown bear census in the upper half of the Noatak River drainage during June 2005 and found adult brown bear density to be 1 adult bear/45.6 mi². (2005 NPS Comment to the BoG)

⁹ NPS comments to BoG / 2005 Arctic / Northwest Regional Meeting / NPS Reference: L30(AKRO-SUBS)

¹⁰ 2009 ADF&G Brown Bear Management Report / Page 283

¹¹ 2009 ADF&G Brown Bear Management Report / Page 289

ADF&G has never produced any scientific data suggesting that artificially reducing the natural brown bear population in GMU 23 will result in an increase in moose density, and subsequently result in an increase in moose harvest rates. The entire policy is based on a flawed assumption with little scientific data to back it up.

“Predation by brown bears, black bears, and wolves certainly affect moose population dynamics; however, *the relative importance of predator in relation to weather, snow, forage, disease, and human harvests is unknown.*” (emphasis added) ¹²

“Moose habitat was not formally evaluated by the Alaska Department of Fish and Game during this reporting period [RY 2005 – 2006].” (clarification added) ¹³

Indeed, the published moose harvest rates for GMU 23 indicate that moose harvest trends are declining despite the current brown bear harvest strategy and despite an increasing trend in the number of moose hunters. So there are more hunters,¹⁴ yet fewer moose harvested which clearly suggests the “assumption” that reducing the brown bear population is benefiting the moose population is not accurate. Recognized scientific principles would suggest ending the liberal brown bear harvest strategy for lands managed by the NPS immediately.¹⁵

The National Park Service is required to be proactive in the management of wildlife resources. The NPS does not have the option to allow significant negative impacts to occur without taking preemptive actions to mitigate the impact. NPS has done research that appears not to have been included in the data set used by ADF&G to inform its recommendations to the BOG on harvest levels in Noatak. In addition, the harvest has been focused on the Noatak River, exacerbating the population problems along that drainage, of which 87% lies within lands managed by the National Park Service.

Simply put, we feel there is an over-estimation of the brown bear population which is leading us to an over-harvest of brown bears when relying on unrealistic brown bear population estimates for lands managed by the National Park Service. In addition, this is all being done for the questionable benefit of increasing moose populations for harvest in conflict with NPS management policies against manipulating wildlife populations.

To get a handle on this complex problem, NPCA is requesting the Board of Game adopt a brown bear harvest objective for the Noatak National Preserve that meets NPS wildlife management mandates. This must be done in cooperation with the National Park Service as a partner in managing this bear population. And it must be pointed out that this proposal does NOT change methods and means, season, or bag limit, so there is no confusion for the hunter. The obvious method to limit harvest is implementing a drawing hunt for brown bears in the Noatak National Preserve. Adopting

¹² 2008 ADF&G Moose Management Report / Page 565

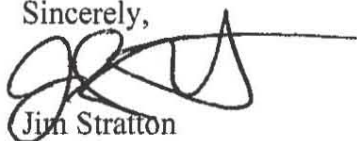
¹³ 2008 ADF&G Moose Management Report / Page 565

¹⁴ “...the total number of moose hunters generally increased from roughly 1980 through this reporting period (2007). Until 2003-2004, most of this increase in hunters was due to visiting resident (nonlocal) and nonresidents...As overall hunter numbers in Unit 23 increase, success rates slowly declines (clarification added).” 2008 Moose Management Report, Page 563.

¹⁵ 2008 ADF&G Moose Management Report: Moose Hunting Effort: 1982 – 267 hunters, 2006 – 448 hunters (68% increase in the number of moose hunters); Success Rate: 1982 - 48%, 2006 – 38%; Moose Harvest Rate: 2000 to 2004 – 174 moose per year, 2005 to 2006 – 161 moose per year

this proposal would set an overall harvest goal that provides hunting opportunity but also meets the mandates of the NPS.

Sincerely,



Jim Stratton
Alaska Regional Director

PO Box 1417
Homer, AK 99603
October 20, 2011

RECEIVED

OCT 24 2011

BOARDS

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

Proposal 35 Unit 15A Wolf control
Proposal 36 Unit 15C Wolf control

Dear Board Members,

I am adamantly opposed to aerial predator control on the Kenai Peninsula. I am opposed to killing wolves to maximize moose hunter satisfaction. I am opposed to killing from aircraft even if it were found to be necessary to reduce the wolf population.

The moose population on the Kenai Peninsula suffers from lack of suitable habitat, not from over predation. As long as we continue to cover willows with asphalt we must accept a declining moose population. We should not further disrupt the balance of nature by optimizing for short-term human access to one game species. We cannot fully understand all the consequences of managing for one species. Wolves contribute to a stable wildlife population and may, for example, help stem the dramatic over population of rabbits on the southern Kenai Peninsula, which decimated acres of small spruce trees last winter because they could not find enough of their preferred diet.

We should allow time for the new regulations limiting legal moose harvest to larger bulls to succeed before we resort to draconian measures. We should preserve more natural habitat for moose and other wildlife if we are really committed to maintaining a long-standing tradition of moose hunting in our increasingly urban backyard.

Thank you for your consideration,



Mary Griswold





Dear Alaska Board of Game

October 28, 2011

Alaska Kenai Peninsula Chapter of Safari Club International is made up of a group of local hunters concerned about the future of wildlife and hunting.

We are very concerned about the present condition of the moose herd on the Kenai Peninsula.

Therefore we support and encourage the Board of Game to go forward with proposal 35 and 36-5AAC 92.125 intensive moose management plans in Units 15-A and 15-C especially the Aerial Wolf Predation Program.

Sincerely,

Kenai Chapter Safari Club International



THOMAS E. MEACHAM
ATTORNEY AT LAW

9500 PROSPECT DRIVE
ANCHORAGE, ALASKA
USA 99507-5924

ALASKA BAR NO. 7111032
1971

TELEPHONE: 907/346-1077
FACSIMILE: 907/346-1028
tmeacham@gci.net

-- TELECOPIER-FACSIMILE TRANSMITTAL COVER SHEET --

Our Fax Number: 907-346-1028

The information communicated by telecopier/facsimile which accompanies this cover sheet is directed to, and is intended solely for the use of, the person or organization to which it has been addressed. It may contain information which is confidential, private, subject to the attorney-client privilege or other applicable privileges, or may otherwise be protected by law against its unauthorized disclosure or dissemination. If you as the recipient are not the intended addressee, you are hereby notified that any use, dissemination, copying or disclosure of the contents of this communication by you is not authorized, and is specifically prohibited. If you have received this communication in error, please notify us promptly by telephone (907-346-1077), and return the misdirected communication to us by U. S. Mail at the address listed above. Your postage will be reimbursed. Thank you for your assistance.

TO: Board Support Section FAX NO.: 907-465-6094

FROM: Tom Meacham DATE/TIME: 10/28/11 4:15pm

COMMENTS: Comments on Proposals 35 and 36

TOTAL NUMBER OF PAGES TRANSMITTED (INCLUDING COVER SHEET): 3

HARD COPY TO FOLLOW BY MAIL? YES: NO: ☒

INCOMPLETE TRANSMISSION? CALL 907-346-1077



October 28, 2011

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

By Fax: (907) 465-6094

Re: Proposals for Aerial Hunting of Wolves on the Kenai Peninsula
Proposals 35 and 36

Dear Board Members:

I am entirely **OPPOSED** to the two proposals to implement aerial wolf control on the Kenai Peninsula. As background, I am a 44-year resident of Alaska, and a former member of the Board of Game (1975-76).

These proposal are misguided, and are entirely "poor science" for the following reasons, among others:

1. The changing habitat on the Kenai will not support moose in numbers that people have become accustomed to. The big burns in the late 1940's and early 1950's created ideal conditions for moose browse, and moose populations soared. Now, fifty years and more later, climax species such as birch and pine are again predominating, thus crowding out moose browse and inevitably reducing moose numbers.

To blame declining moose numbers on wolf predation is unsupported conjecture, and is simply wrong. To propose that reducing wolf numbers is logical and reasonable compensation for declining moose browse is misguided and wrong. Ask your own Fish and Game biologists for their honest opinions regarding the present habitat and carrying capacity of the Kenai for moose numbers, in the abundance that the Board wants to obtain. They should tell you that something more fundamental than wolf predation is going on.

This is one of the most unscientifically based proposals I have seen promoted by the Board in recent years. The Board claims to base its decisions on "sound science." Where is the "sound science" here?



ATTN: Board of Game Comments
Alaska Department of Fish and Game
Boards Support Section
October 28, 2011
Page 2

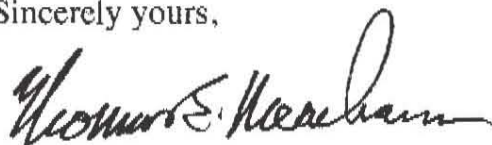
Re: Proposals for Aerial Hunting of Wolves on the Kenai Peninsula
Proposals 35 and 36

2. The fact that the Board cannot command that aerial wolf control occur on federal Refuge and Park lands on the Kenai (and for good reason) means that any aerial wolf control only on state lands will be incomplete, will not achieve the overall results that the Board wants, and will simply target certain lands disproportionately. I appreciate the fact that the statutes that govern federal Refuge and Park lands do not permit these lands to be manipulated by the Board in its misguided attempt to create a moose factory on the Kenai.

3. Any Board proposal so significant to a specific geographic area as Proposals 35 and 36 should be given public airing and debate in the area to be affected, and not in Barrow. I fully understand that the Board would like to avoid heat and dodge hard facts, but this is ridiculous. If these proposal persist, they should be deferred to the next Board meeting held in Southcentral Alaska.

I urge that the Board of Game **reject** Proposals 35 and 36.

Sincerely yours,



Thomas E. Meacham
9500 Prospect Drive
Anchorage, Alaska 99507



October 28, 2011

Board of Game Comments

Alaska Dept. of Fish and Game

Boards Support Section

P.O. Box 115526

Juneau, AK 99811

Re: Comments Addressing ADFG Proposal 36 – Game Mgt. Unit 15C

Dear Board Members:

The ADFG proposal to initiate a “wolf predation control area” in a portion of Unit 15C is all about moose populations and harvest levels. In general, I agree with principals of game management that include control of predator populations. For the case at hand, however, I have difficulty accepting some ADFG presumptions about habitat quality which is the basis for this proposal.

The information provided by ADFG in their proposal indicates moose populations in Unit 15C have increased by 40% during the period of 1992 to 2010. This population increase comes as no surprise.

During the period of 1992 to 1998, the forest in the northern part of Unit 15C experienced a very significant and dramatic structural change. According to Ed Holsten, (USFS Forest Entomologist) the most intensive spruce bark beetle epidemic every recorded in North America history occurred in this area during that period. In a forest composed mostly of spruce, the mortality ranged to 90% - 95% of intermediate and mature age-class trees in this area.

Because of beetle impacts, inflated fire risk, etc; most large landowners within Unit 15C initiated timber salvage harvest operations. Altogether, about 120,000 acres of dead/dying spruce forests were logged.

In terms of vegetative response to forest management actions, most logging units now contain a considerable amount of birch regeneration. It is fully evident moose heavily browse these areas.

Where no management action was taken to address the dead forest stands after beetle infestation, these forests by now have started to fully unravel. Most stands have 50% - 75% tree stem breakage which has produced a jackstraw configuration of considerable depth. Surface vegetation is now dominated by native blue joint grass (*Calamagrostis Canadensis*).



The "lower Peninsula", to include the Anchor River drainage and benches around Homer and East End Road, has traditionally been a haven for moose during the winter time. From what I have observed doing forestry work in this moose winter range area over the past 34 years, much of the browse vegetation is in poor health, and decadent. Many browse plants are dying because of over-browsing.

Along with sparse food resources, there are now large areas of jack-straw spruce forest. And when you add winter snow pack to this tangled forest arrangement, it is tough going for moose travel. There are far fewer moose tracks to be found during winter in this part of Unit 15C. It is easy to theorize that moose, and yearling calves in particular, expend far more energy trying to over-winter in this range than they have fat reserves. And the poor quality browse does not provide enough food resources to make it through winter.

With the above said, I recommend the Board of Game give ADFG a firm mandate to initiate a substantial amount of habitat quality improvement within the "Anchor River-Fritz Creek Critical Habitat Area". This important moose winter range contains thousands of acres of dead jack-spruce and the once plentiful browse growth is seriously depleted. I suggest to you that fixing this habitat problem on ADFG managed lands is every bit as important as a predator control program.

I have never understood the cultural differences between ADFG offices? ADFG is fairly proactive in doing habitat improvement work within interior Alaska. In south central Alaska, and Unit 15C in particular, ADFG has not lifted a finger to address the loss of forest structure and the demise of habitat quality on the lands they control; but do not actively manage?

Actions are needed to improve the quality of moose habitat in this "critical" habitat area. Even if the Board of Game considers predator control a necessary management function, please help get ADFG "off the stump" and working towards a program to fix the poor conditions in this important moose winter range.

Thank for your time and consideration of my observations and proposals.

Sincerely,



Wade W. Wahrenbrock
36720 True Fir Circle
Soldotna, AK 99669



Page 1 of 2

To Governor Sean Parnell
fish and game commissioner Cora Campbell
and director of wildlife conservation Corey Rossi

This letter is in regard to the desperate state of moose, caribou and black bears on the Kenai Peninsula. The board of game has proposals 35 and 36 on its agenda for the barrow meeting. (good to be on the agenda but barrow is a poor place to have this discussed). My first issue is the entire kenai peninsula should be in these proposals and the reason is brown bear and wolves. moose harvest are about 10% of historic about 50 for the whole penn. when it should be around 500. With the new antler restrictions as a move to save moose, (a lack of bulls is not the problem nor is habitat), brown bears are eating calves and often eat the cows also. With management protecting brown bears, moose will soon be a thing of the past on the penn., Soon to follow will be caribou and black bears. what will this population of brown bears eat after that? my guess! they will eat each other then whatever is in town. End result is no more brown bears as well. Poor management is the reason for this. Brown bear outnumber moose and black bear in the area that i hunt in unit 7 about 2 to 1, cow moose populations are dropping and bull population is stable for now but no calves = no more moose. Black bear populations are also dropping, brown bear are the problem.

I am concerned with the fact that 100 permits are available but the biologists will not issue them. A general season is needed as fish and game bear logs should tell anyone with common sense. Look at the numbers of brown bear hides at every fur rondo. Who really gains from the few dollars they bring, most are off season pelts poorly handled. this policy does require a full time person just to deal with all the calls. We need a new direction with a new person in charge if we hope to see a return of moose.

the next issue is wolves, low market value for peninsula wolves and the remote areas they live makes it hard to reduce the numbers. One pack south and west of hope is over 16 and the only way to reduce it is from the air

I repeat we need a new biologist that is willing to manage all game on the peninsula

I am an avid hunter with over 40 years hunting moose, also an avid black bear hunter spending around 60 days per year in the field. I have been active with fish and game advisory since the mid 70's and a current ac member in Seward. I also have monitored bears both black and brown on my bait stations for years and know most of the bears by pictures so am comfortable with my numbers in this area
(19 brown bears on 4 miles of Exit Glacier Rd this spring). We need to do something now.

thanks for your time Robert D. White
po box 201
Seward, Ak 99664

ph. 907-362-1453

Robert D. White
10/28/11



ATTN Board Of Game Comments

Page 2 of 2

To the board of game; regarding proposals 35 and 36

An intensive predator removal plan is needed, the proposal is only for 15A and 15C they should include the entire kenai peninsula 15B and 7.

first the numbers don't lie annual harvest averages in the 550 range drops to around 50. Its predictable if you are a hunter who spends time in the field. in my little corner of unit 7 the brown bears outnumber the moose, add a small wolf pack to exterminate moose even faster. while black bears get some calves the brown bears get the some cows as well. we up the limit on black bears no additional brown bear permits are issued. two dlps on brown bear and a camera count this spring of 19 brown bear on exit glacier rd alone 4 new cubs so we are not keeping up with the natural growth of population. bulls are available and calves are born but don't make it to fall and many cows don't make it past calving. currently brown bears have a negative value to hunters because they consume the whole of the moose and black bear populations that we can hunt. no hope in sight of any management for moose only ridiculous tales of rabbits eating the moose food and tales of poor feed and low birth rates, birth rates don't count for much if they only get eaten at or before birth now add to this the huge packs of wolves, does a moose have a chance?

we hunters restricted our own harvest with antler restrictions and created a healthy heard but the brown bear is protected and with an additional protien source did very well and is in no danger of going away, however that is not the case with moose. no antler restriction will fix the moose problem, with as many brown bears and wolves moose have no chance.

I would urge an open season on brown bear peninsula wide. and a new biologist to go with it, his numbers don't add up.



10/24/11

Robert D. White

Po Box 201

Seward AK 99664

Ph 907-362-1453



Rhonda Lanier
Oceanside, CA 92058
rhondarlanier@aol.com

October 27, 2008

ATTN: Board of Game Comments
Alaska Department of Fish and Game
Boards Support Section
Juneau, AK 99811-5526
By Fax: (907) 465 6094

Re: **I oppose Proposals 35 and 36 – Implementing aerial wolf killing on the Kenai Peninsula**

Dear Alaska Board of Game:

As someone who has fond memories of visiting my aunt and uncle years ago while they were living in Alaska, I remember being in total awe of the incredible beauty of the Kenai Peninsula and in particular Kenai National Wildlife Refuge. I am therefore, very saddened and angry to learn that the BOG is considering allowing the aerial hunting of wolves in this area. The close proximity to the National Wildlife Refuge is **federally** managed land is therefore off limits to the state's predator control programs. In addition this is an area heavily populated by tourists, many of whom make the trip to Alaska for no other reason than to see Alaska's wolves. It would make much better sense to promote Alaska wolves as the valuable tourism attraction they are. The aerial wolf killing, if allowed, will be extremely controversial, and due to the heavy tourism in the area, quite visible. Is this what you really want to promote when people visit Alaska?

The fact that the Alaska Department of Fish & Game presented evidence to the BOG earlier this year concluded that the declining moose population was not due to predation makes one question why this is even being considered. A cited low bull-to-cow ratio, again according to Fish & Game, cannot be traced to wolf predation, so the natural reaction is why target wolves, when they clearly are not the problem.

Finally, I would like to point out that as the BOG requested that Fish & Game craft aerial wolf control plans at the meeting in March 2011, the fact that these plans were just recently published for public review is simply not good policy.

Thank you very much for considering my comments regarding a part of Alaska that is very special to me.



Rhonda Lanier



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

October 27, 2011

Re: Proposals 29, 35, and 36.

Dear BOG Members:

I would like to submit the following comments regarding proposals that are scheduled to be considered at the November 11-14, 2011 meeting in Barrow.

Proposal 29. Allocate 50% of the Unit 23 moose permits for DM 875 to guides.

This proposal would, if approved, privatize part of the Unit 23 moose harvest, a common-pool resource. It essentially establishes an entitlement which guarantees that at least 50% of those who receive Unit 23 nonresident moose hunting permits will hire guides, whether they need to or not. While this may be lucrative for some guides, it establishes a terrible precedence that could spread to other parts of the state as well. If this proposal is approved, providing guides their "share" of the business (i.e. harvest) will become a mandate that has undue influence in the management of this common-pool resource. I urge you to say no to Proposal 29.

Proposal 35 and 36. Approve an intensive management plan for moose in Unit 15A and 15C.

I consider each of these proposals a placebo. Neither proposal will really improve the health of the Kenai Peninsula moose herd, but starting an aerial wolf control program on the Kenai Peninsula will make some people feel really good. These proposals will be ineffective because neither addresses what really ails the moose herd. In essence, this is an exercise in ideology rather than biology and I urge the board to vote no on both proposals. Following are some additional comments on these proposals.

Proposal 35. Last year ADF&G submitted Proposal 34 to the Board of Game which proposed an intensive management plan for Unit 15A that sought to increase moose populations and provide greater assurance of meeting the units harvest objective. This plan recognized that "habitat may be the limiting the growth of the population." Accordingly, what was recommended was a habitat enhancement plan. The proposal also stated that, "Predator management may be considered however land status and timbered forests would make success of this program questionable." I personally supported this proposal, considering it to be the most likely, and perhaps most cost-effective, approach for meeting the objective.

The BOG approved this proposal, but then due to unspecified errors and oversight, apparently withdrew support and asked ADF&G to draft a plan that included aerial wolf control. This is puzzling to me given that 18% of the land in Unit 15A is privately owned and 79% of Unit 15C



is within the Kenai National Wildlife Refuge. Getting permission from private land owners for aerial wolf control will not be easy. Furthermore, based on other predator- prey incidents, it doesn't appear likely that the U.S. Fish and Wildlife Service will agree to aerial wolf control on the Kenai National Wildlife Refuge. Consequently, there will be extremely limited opportunity to carry out an aerial wolf control program.

But what may be the hidden objective here is to create a confrontation with the U.S. Fish and Wildlife Service with hopes that they will be politically forced to change their policy about not allowing aerial wolf control on national wildlife refuges. This seems to me to be the only explanation for the BOG's insistence to take up aerial wolf control for Unit 15A. If picking a fight is a motive, then the BOG needs to consider the fiscal ramifications of this objective, such as possible law suits by the State in support of the BOG position. The full plan should be available to the public and open for discussion.

Proposal 35 says that the Intensive Management population objective for 15A is 3,000-3,500 moose. What isn't clear is whether or not this is a sustainable population given the current condition of the habitat and its carrying capacity. If not, the population objective should be reduced to something that is realistic. If the BOG wants to demonstrate that this proposal is driven by biology rather than ideology, it would insist on some verification that the habitat can sustain the increase in moose population that is expected from aerial wolf control.

Proposal 36. As stated by the proposal, the current problem with moose in Unit 15C is the bull:cow, not population. As someone who hunts moose in Units 15C, I reluctantly agreed with the action taken last year by the BOG to reduce bull harvest by repealing the spike-fork and three brow tines rule and allowing harvest of only moose with four or more brow tines. It appears that this change is already having its desired effect. Given this progress, I am puzzled why the BOG now insists on an aerial wolf control program for Unit 15C. I don't think it will improve matters. Indeed, I think there is substantial risk that things could get worse.

I am opposed to an aerial wolf control program for the following reasons.

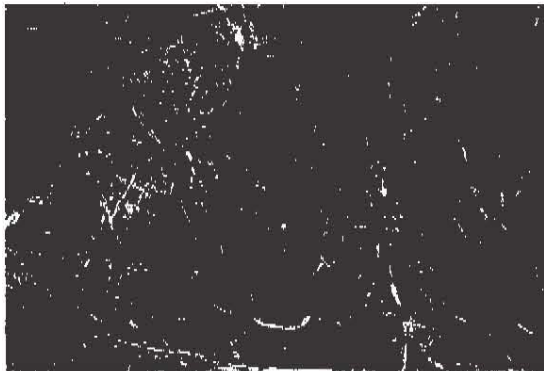
1. **Bull:Cow.** The proposal suggests causality between the bull:cow and aerial wolf control. This doesn't make sense. While hunters are selective in terms of which sex they kill, I don't think a case can be made that wolves also select males when they prey on moose calves. While wolf control may increase the survival rate for both male and female calves, allowing more recruitment into the herd will not change the ratio of bulls to cows if this reallocation of moose from wolves to hunters follows the same pattern that existed before. Most of the second year bulls will be killed by hunters, getting us back to where we were before. In my mind, the only way to improve the bull:cow is by redirecting some of the hunter pressure to an increase in the harvest of cows.

2. **Winter Carrying Capacity.** Looking at how heavy the moose browse is at key winter habitat areas in Unit 15C, reducing the wolf population to increase moose population runs the serious risk of exceeding the carrying capacity and causing long-term damage to the habitat. Because of this risk, no aerial wolf control program should be considered before there is a comprehensive assessment of moose habitat to assure that the current habitat can withstand an



increase in moose population. In fact, it may show that the current population of moose may already be at the brink of sustainably.

3. Moth Defoliation. This last summer I noticed that extensive swaths of willow and alder in the Kachemak Bay area lost nearly all their foliage to the recent infestation of Geometrid moths. To illustrate, below are some photos I took this summer in the Anchor River Critical Habitat Area, which is prime moose habitat.



Defoliated willow shrubs.



Swath of willow shrubs affected by moth.

This situation has also been noted by many others. Attached is an article by John Morton of the Kenai National Wildlife Refuge that gives more detailed information about the moths. Other articles on the moths have appeared in local newspapers. Although information on this infestation was widely available this summer, Proposal 36 does not acknowledge that moose habitat is under stress from moth infestation. Consequently, it does not appear that ADF&G biologists utilized all the relevant biological information that was available to them when drafting this proposal.

Not only are the caterpillars of these moths eating nearly all the leaves of willows and other shrubs, depriving moose of summer food and the ability to put on fat for the winter, but the defoliation is stunting the growth of twigs which moose feed on in the winter. As the Morton article says, this condition could last a couple of years. Accordingly, it seems that the winter carrying capacity for moose over the next few years may not be what it has been in recent years. If so, it seems that this would be the wrong time to increase moose populations via an aerial wolf control program.

Here again is a good opportunity for the BOG to demonstrate that its decisions are based on biology and not ideology. The BOG needs to insist on a current assessment of moose habitat in 15C and be assured that any increase in moose population due to aerial wolf control can be biologically sustained.

4. Watchable Wildlife. As a hunter, I want opportunity to hunt moose in my home GMU. And as an outdoors person who enjoys watching wildlife, I enjoy watching not just moose but, on rare occasions, wolves or even just sign of wolves. I really enjoy coming across wolf tracks when I am skiing in the backcountry. While this may seem like a contradiction, it's not if you believe


that wildlife management, in order to provide ample opportunity for all stakeholders, needs to manage for diversity as well as abundance. While I would agree to a wolf control program if there were a predator pit situation in 15C, the data in Proposal 36 clearly indicates that this is not the case. If anything, given the current condition of the habitat, there may be too many moose. Hence, there is no reason to deny me the opportunity to see wolves, or even wolf sign, because of aerial wolf control.

With regards to Unit 15C, my recommendation to the BOG is to thin the current size of the moose herd, because of stress on critical habitat, by substantially increasing the number of cow permits. I think this will;

1. Provide greater opportunity for hunters to harvest moose.
2. Improve the bull:cow situation.
3. Assure that the current moose population is sustainable and does not exceed the current winter carrying capacity.
4. Provide opportunity to view wolves as well as moose.

I appreciate the opportunity to provide testimony.

Sincerely



George Matz
PO Box 15182
Fritz Creek, AK 99603
geomatz@alaska.net



Refuge Notebook

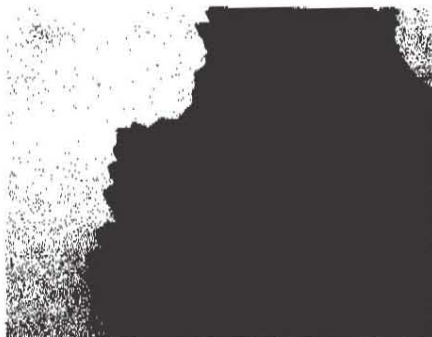
Article

July 29, 2011

Moose browse is more complicated than it seems

By John Morton

It seems a little early to be worrying about winter browse for moose on the Kenai Peninsula, but recent sightings of bare willow and alder stands are raising the eye brows of biologists at the Kenai National Wildlife Refuge. Large areas of subalpine willow show up as brown patches from the air on the Tustumena Benchlands (see photo). Closer to home, thinleaf alder (*Alnus tenuifolia*) has been defoliated along the road system from Kasilof to Moose Pass.



Needless to say, for shrubs that store up food for the winter by photosynthesizing carbohydrates in their leaves, these observations don't bode well for moose once the snow flies. Both willow and alder are browsed on by moose during the winter, and the various kinds of willow constitute the primary food of Alaskan moose in general.

The insects that graze on alder and willow leaves are very different in their life history. Willows are attacked by the caterpillars of several species of Geometrid moth including the autumnal moth (*Epirrita autumnata*) and Bruce spanworm (*Operophtera bruceata*). The former is an exotic from Europe but the latter is a moth species native to Alaska. We most likely have the spanworm here on the Kenai. Both species are well adapted to cold weather and have even been seen flying during snow storms!

Geometrid moths commonly appear and abruptly disappear mysteriously. Most outbreaks last less than three years and seldom cause permanent damage to the shrub host. However, you can imagine that a shrub that photosynthesizes poorly during the summer may not have a lot of nutritional value for moose later that winter.

Alders, in particular the thinleaf alder, are attacked by the caterpillars of the green alder sawfly (*Monsoma pulveratum*). This insect is an Old World species, first found in North America in the mid 1990s and first detected in Alaska in 2005. Unlike Geometrid moths, this introduced sawfly may ultimately kill its shrub host since it appears capable of consuming woody tissue in addition to leaves.

The potential to cause permanent damage is increased by the fact that two other sawfly species, the woolly and striped alder sawflies, may also attack the same alder simultaneously. Furthermore, infestation by the Alder canker, most often caused by the fungus *Valsa melanodiscus*, can also result in death of the twigs and sometimes the stem.



To make matters worse, two *Phytophthora* species may be associated with the canker in Alaska. *Phytophthora*, which in Latin means the "plant destroyer", is a pathogen that causes root rot. A species of *Phytophthora* caused the infamous potato blight in Ireland in the mid 1800s. One of the two Alaskan species is unnamed and new to science, while the other (*P. alni* subsp. *uniformis*) is involved in alder disease in nearly a dozen European countries. The 2007 discovery of *P. alni uniformis* in Alaska was the first time that this pathogen had been confirmed in North America. While mortality has not yet been detected in Alaska, Dr. Jim Kruse, an entomologist with the U.S. Forest Service, suggests that the two species may have existed benignly beneath alder or been introduced from Europe, where *Phytophthora* species devastate alder.

Alder dieback along our streams could have a serious impact on our salmon populations. At a time when a warming climate is raising the temperatures of some streams on the Kenai above the spawning threshold for short periods of time, they need all the shade they can get. Alder is also a natural nitrogen fixer, and contributes directly to stream productivity.

Believe it or not, snow depth may also influence the nutritional quality of shrubs. The protein content of shrubs is increased by higher rates of nitrogen mineralization in the soil. Nitrogen mineralization is increased by higher soil temperatures during winter, and soil temperatures are directly impacted by the depth of snow. Snow acts as an insulating layer, so deep snow means more protein in winter browse for moose.

On the North Slope, research published in 2005 in the journal *BioScience* indicates that higher temperatures and more snow due to a warming climate have resulted in the spread of shrubs on the arctic tundra. Here on the Kenai, however, even as woody shrubs such as willow and dwarf birch invade 8,000 year-old peatlands due to a warming climate, it's possible that their nitrogen content may be low if the average snow pack declines over time due to less snow, more rain, or winter temperatures that cause more snow to melt. That's a little speculative at this point, but it's the kind of ecological phenomenon that ensures job security for biologists.

So, later this winter, when the moose are browsing on your prized ornamental bush in the backyard and you're cursing for not having taken the time to fence it in, be appreciative of the unusually tough times that our moose may be experiencing. If that doesn't work for you, at least appreciate that the science behind this is more complicated than the first glance at a simple twig might suggest.

John Morton is the supervisory biologist at Kenai National Wildlife Refuge. Check out our Facebook at <http://www.facebook.com/kenainationalwildliferefuge>.



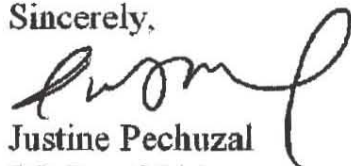
To whom it may concern:

I am a Kenai Peninsula resident with serious concerns about proposals 35 and 36. The first regards following best available research. Before engaging in aerial wolf killing, I would like to hear more scientific data backing up the theory that wolf predation is the cause for moose decline on the Kenai Peninsula. Thus far the scientific data points to loss of habitat as the reason for moose decline. Aerial shooting is an extreme reaction, and should only be done in extreme cases. I am against targeting top predators.

My second concern regards the process of passing proposal 35 & 36. As there is no proposal available for public review, and the meeting will be held at an inaccessible location (Barrow) for the constituents, I do not feel that the passage is democratic. Please consider discussing this proposal with Kenai Peninsula residents at the January BOG meeting in Anchorage. To sum it up: I am against Proposal 35 and 36 until more information is available and my voice is represented in the decision.

Thank you for hearing my concerns.

Sincerely,



Justine Pechuzal
PO Box 2514
Seward, AK 99664



October 27, 2011

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

Dear Board of Game:

I am writing to you to express my vehement opposition to BOG proposals 35 and 36 which proposes to implement aerial wolf control in Game Management Units 15A and 15C which includes much of the western and southern areas of the Kenai Peninsula. I oppose this action because ADF&G's own scientific data, presented to the BOG in March, implies that poor habitat is largely responsible for the decline of moose populations – not wolf predation.

It is my understanding that Kenai National Wildlife Refuge (Unit 15A) is federally managed land, and as such, it should remain off limits to any kind of predator control programs. As for the remaining areas, predator control will likely be ineffective and unlikely to positively affect moose populations.

As for Unit 15C, it has been reported that moose populations are not declining, according to ADF&G's own analysis. A reported low bull-to-cow ratio has not been linked to wolf predation. More likely, this decline is the result of years of hunters' prior over-harvest of bull moose. Are hunters entitled to *every* game animal in the woods? That sense of entitlement is reflected in environmental destruction across the board. Restraint, rather than entitlement, is what has protected most of the wild places we enjoy today. Restrictions on development, for instance, result in more open space and public use areas, which make our human communities healthier and increase our quality of life. Similarly, restraint is important in preserving native wildlife. Hunters who feel entitled to hunt as many animals as they want, and thus advocate for the destruction of native predators, turn a blind eye to ecosystems out of balance, the general health of the wild lands we hold precious and the rights of other citizens who value the role of predators in the maintenance of our environment. *None of us are so entitled.*

Finally, aerial wolf killing is impractical and dangerous; any private citizen with a permit – not trained ADF&G biologists - will be allowed to shoot wolves from aircraft and that concept is totally unacceptable and violates every principle of national security. This practice is also a highly visible and controversial measure that will certainly impact recreational visits from tourists who visit Alaska for its wildness and wildlife watching.

It is my understanding that public input regarding this proposal is limited. I urgently request that the BOG postpone action on the proposals until its January meeting in Anchorage, when residents directly affected by the measures would have a fair opportunity to have their voices heard.

Respectfully submitted,
Diane Bentivegna
Diane Bentivegna



P.O. Box 2460
Homer AK 99603

October 27, 2011

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

Dear Board Members:

RE: Proposals 35—Aerial Wolf Control in GMU 15A

I strongly oppose Proposal 35 for the following reasons:

1. This Proposal is out of cycle and the details were not available to the public until October 14, 2011. According to the Alaska Procedures Act at least 30 days notice is mandatory. The public was not lawfully given adequate notice to prepare for the emergency statewide Fish and Game Advisory Committee meetings, the October 28 deadline for comments to be included in the Board of Game packets, and the November 11 meeting in Barrow. Furthermore, the local biologists do not have their response completed for the October 28 deadline.
2. There has not been a recent study on moose productivity in 15A, and there is not an adequate wolf census at this time.
3. Scientific research indicates moose in Unit 15A are starving because of decreased moose browse due to lack of fires. Killing wolves would only add to this problem.
4. This is the smallest area ever proposed for aerial wolf killing. It is too small to be effective. It would be better to collaborate with the Kenai National Wildlife Refuge to improve habitat for moose.
5. This area has a large tourism industry with many people traveling thousands of miles to view wildlife--all wildlife. Their expectation is to see "nature running wild." This plan will negatively affect visitors' expectations. Wolves in this area are worth more alive than dead.
6. Aerial wolf killing is a very controversial practice. Intensive management practices should be a last resort, not the first. Intensive Management logically should require habitat improvement before predator control is implemented to avoid starving moose.
7. Unit 15A has an abundance of other food sources for residents, including access to organic beef, locally grown vegetables, and excellent fishing.
8. This area is on the road system, which increases the hunting pressure on moose.

RE: Proposals 36—Aerial Wolf Control in GMU 15A

I strongly oppose Proposal 36 for the following reasons:

1. This Proposal is out of cycle and the details were not available to the public until October 14, 2011. According to the Alaska Procedures Act at least 30 days notice is mandatory. The public was not lawfully given adequate notice to prepare for the emergency statewide Fish and Game Advisory Committee meetings, the October 28 deadline for comments to be included in



the Board of Game packets, and the November 11 meeting in Barrow. Furthermore, the local biologists do not have their response completed for the October 28 deadline.

2. There has not been a recent study on moose productivity in 15C, and there is not an adequate wolf census at this time.
3. BOG implemented a hunting regulation change in Unit 15C last year, removing spike or fork and 3-brow tine from the harvestable population. There has not been adequate time to see the effect of these changes. Thus an aerial wolf kill plan is premature.
4. Unit 15C is in the mid-range of the objective numbers for moose, indicating there is no emergency need for such a heavy-handed method. In fact, doing this could put the habitat at risk of over browsing if the carrying capacity for moose is exceeded.
5. This area has a large tourism industry with many people traveling thousands of miles to view wildlife--all wildlife. Their expectation is to see "nature running wild." This plan will negatively affect visitors' expectations. Wolves in this area are worth more alive than dead.
6. Aerial wolf killing is a very controversial practice. Intensive management practices should be a last resort, not the first.

In closing, I am a strong advocate for a healthy ecosystem and biodiversity. Humans have a tendency to control nature for our own benefit, which has sometimes proven detrimental. We definitely affect the numbers of moose by hunting, moose-motor vehicle collisions, poaching, and increasing human population which decreases moose habitat. These plans do not adequately address alternative management actions nor are they supported by adequate science. Please vote no on both proposals.

Sincerely,

Roberta Highland

Roberta Highland

CC: Commissioner of Alaska Department of Fish and Game
Lt. Governor Meade Treadwell



October 28, 2011

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

RE: Oppose Proposals 35 and 36

To Whom It May Concern:

Thank you for the opportunity to submit these written comments on Proposal 35 (Proposal) that would approve an intensive management plan for moose in 15A and 15C and will be considered at the November 11-14, 2011 Board of Game (BOG) meeting in Barrow, Alaska. I am a resident of Homer, Alaska and testified in opposition to the proposals at the Homer Fish and Game Advisory Committee Meeting held in Homer on October 25th. My oppositions to the proposal includes the following reasons:

I. The Proposal Violates Public Notice and Comment Procedures.

I have substantial concerns over the fact that the BOG has inhibited public participation by providing the public insufficient time to review the plan. Specifically, the Proposal was not made available to the public until it was published on the Alaska Department of Fish and Game web-site on October 17, 2011. This is a violation of the Public Notice Comment requirement under the Alaska Administrative Procedures Act which provides:

- (a) At least 30 days before the adoption, amendment, or repeal of a regulation, notice of the proposed action shall be;
 - (1) published in the newspaper of general circulation or trade or industry publication that the state agency prescribes and posted on the Alaska Online Public Notice System; in the discretion of the state agency giving the notice, the requirement of publication in a newspaper or trade or industry publication may be satisfied by using a combination of publication and broadcasting; when broadcasting the notice, an agency may use an abbreviated form of the notice if the broadcast provides the name and date of the newspaper or trade or industry journal and the Internet address of the Alaska Online Public Notice System where the full text of the notice can be found;
 - (2) furnished to every person who has filed a request for notice of proposed action with the state agency...

AS 44.62.190.



Therefore, based on the fact that the Proposal was not published until October in preparation and the Board will be considering the Proposal sometime during the November 11-14th meeting and none of the other conditions of AS 44.62.190(a)(1)&(2) have, apparently, been complied with, the Board is prohibited from making any decision on the Proposal at the November Board meeting. In addition, in the Alaska Department of Fish and Game's (ADF&G') rush to complete the Proposal, the proposal has been insufficiently developed and was not even included in the ADF&G's November proposal book. This prevented the BOG, Advisory Committees and the general public from being able to review the Proposal in a sufficient amount of time and has contributed to a substantial amount of confusion relating to understanding the scientific basis for the Proposal. The BOG has, further, prevented me and other interested members of the public from participating in the November meeting by holding the discussion and decision on the Proposal in Barrow far from the communities that will be directly affected.

The failure of the BOG to acknowledge the need for public participation in such a controversial proposal is detrimental to the public process and a violation of state law. I, therefore, request, at the very least, that consideration of the Proposals be moved to the January meeting in Anchorage in order to allow for my participation and that of individuals who will be directly impacted by the Proposals.

II. Wolf control is not biologically warranted, appropriate, or feasible in Units 15A or 15C.

Rather than wolf predation, biologists recognize that habitat is limiting moose population growth in both 15A. The Proposal, itself, states "declining habitat quality is the main limiting factor affecting low moose densities in Unit 15(A); there has not been a fire of significant size in the unit for over 40 years." Further, ADF&G recognized that the current moose population objectives for 15A were too high as illustrated by a proposal recommending the moose population objectives be lowered was submitted by ADF&G for the March BOG meeting. Despite extensive biological evidence that such a reduction was necessary, the BOG rejected the proposed reduction in objectives. Due to the widely recognized habitat limitations in 15A, ADF&G also stated that "if predator densities were reduced to increase moose numbers without concomitant wide-spread improvements to the habitat any increases to moose survival would further increase the nutritional stress of the moose population thereby reducing productivity."

That habitat, rather than predation, however, is limiting moose population growth in 15A is illustrated by ADF&G, itself, which provides, in the Proposal that habitat is limiting the population as illustrated by data presenting poor nutritional condition. Further, the original habitat plan for this program states that bull: cow ratios have been stable since the 1990's (see proposal 174). Reducing calf mortality through control of



wolves, in the hopes of improving the bull: cow ratio when neither low bull: cow ratios, nor excessive calf predation, have been identified as limiting factors is scientifically unfounded.

Similarly, as in the case of 15A, implementing aerial wolf control in Unit 15C is not supported by current biological conditions. For this reason, ADF&G recommended "Do Not Adopt" for March meeting proposals 172 and 173 which called for aerial taking of wolves in all of Unit 15 under intensive management. The agency's rationale was that "Unit 15C is currently within intensive management objectives for both population size and harvest."

Not only is there insufficient scientific basis for the Proposal, but there is a substantial question as to whether it will even work at all. The Proposal, itself, provides that "reducing predation will allow for *possible* reallocation of moose from predators to harvest..." Similarly, the only thing that remotely resembles a scientific bases for the Proposal is "the *potential effectiveness* of aerial wolf control." This means that the Proposal is not even remotely based in science and is almost entirely based in politics.

The Proposal is further flawed by it's complete failure to study the impacts of reducing wolf numbers on the wolf population itself. This is particularly true since the Proposal will be largely ineffective in increasing moose populations until habitat conditions improve and will have to be repeated in future years to have any measurable impact on such populations at all, let alone to reach the BOG's objectives.

Finally, the Proposal fails to address the likely further decline of habitat necessary to produce healthy moose populations if wolf populations are reduced in 15A and 15C. This is based on numerous studies illustrating that wolves are key species in the health of ecosystems and, therefore, populations of moose and other ungulates. Wolves are a keystone predator, and as such, is an integral component of healthy functioning ecosystems. The admission on the one hand of the ADF&G, itself, that habitat is the major factor that is limiting moose populations but, completely, failing to even mention maintaining the healthy numbers of wolves in 15A and 15C as a means of addressing such habitat issues on the other, illustrates the complete lack of sound science upon which the Proposal is based.

Conclusion

The fact that the ADF&G, itself, expressly admits that habitat degradation due to lack of fire and other factors, is the primary cause of Moose populations that are not meeting the BOG's arbitrary levels of for Moose population objectives and ADF&G's statement that controlling wolves has a mere "possibility" of increasing moose populations, illustrates that the Proposal is highly unlikely to meet BOG objectives. Further, the fact that it will likely require multiple control applications which will result in the removal of a keystone species that is necessary to improve moose habitat conditions, means that the Proposal will, actually, negatively impact both moose and wolf populations over the long term. This proposal is best illustrated by the words of one ADF&G representative at the Homer Advisory Committee meeting who said, "the BOG



directed ADG&G to increase moose populations as quickly as possible” which illustrates that this proposal has nothing to do with science and everything to do with politics.

Please contact me if you have any questions regarding these comments.

Sincerely,

s/Hal Shepherd

Hal Shepherd

P.O. Box 15332

Fritz Creek, AK 99603



Dear Board of Game Members:

I am writing to express my **opposition** to Board of Game Proposal 35 and 36 relating to aerial wolf hunting on the Kenai Peninsula. I do not believe that there is adequate science based research backing this type of predator control practice. Prior to approving such a measure I would like to see published, peer reviewed research justifying the need to control wolves in this area and showing the long term effects on the wolf population, moose population and other wildlife in the area. I also believe that this type of approach to wolf management is unsafe, posing dangers for recreational users in the area, amateur aerial hunters and pilots.

Aerial killing of wolves also poses a public relations nightmare for the state of Alaska. It casts the state in a very poor light nationally and could have far reaching implications for the tourism industry. National and local environmental groups will likely highlight these practices and potentially call for boycotts of Alaskan tourism businesses. This is not what this state needs now. We need to show the rest of the country that we are enlightened, follow science based wildlife management practices and respect the precious resource that wildlife is to this state. For these reasons I am in strong opposition to proposal 35 and 36 and request that these not be approved.

Sincerely,
Dori Broglino
2188 Lawson Creek Rd. - Apt. D
Douglas, AK 99824



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

RE: Opposition to BOG proposals 35 and 36 aerial wolf control in
Game Management Units 15A and 15C,

Dear Sirs

I oppose the aerial killing of wolves for the reasons listed below:
The cause of the reduced moose population is unclear and not
necessarily due to wolves but could well be due to the poor habitat.

Intrusion within the Kenai National Wildlife Refuge and recreational
areas is dangerous, impractical and an inefficient means of
controlling the wolf population in forested terrain.

The inhabitants of those areas most affected by this proposal have
not been given sufficient access to these proposals to voice their
opinions.

Please reconsider this ruling which is hasty and not in the best
interests of man or nature.

Sincerely

Anne Wilson



Dear BOG please postpone action on proposals 35 and 36 until our Alaskan citizen residence who would be affected have an equal opportunity rightfully voice their opinions.

I, Kimberly C. Kellar of Wasilla, Alaska **OPPOSE Proposal 35**
The Alaska Department of Fish & Game's own evidence presented to the BOG in March concluded that predation was not the cause of declining moose populations on the K. So why target wolves?

I, Kimberly C. Kellar of Wasilla, Alaska **OPPOSE Proposal 36**
"Aerial predator control of any type in Alaska is not appropriate in a densely populated area that is heavily used for recreation by Alaskans and visitors alike."

Sincerely,
Kimberly Kellar



35, 35 oppose

Take lives only if you can give them back! Stop killing wildlife. Airborne Wolf killings are horrendous, people who abet this heinous crime seem to have lost their conscience.

Every living being has the right to exist on this planet.

Yamini Venkatachalam
Baroda, India



OPPOSE 35, 36

Hi, I particularly don't support the fact that any private citizen w/ a permit - not trained ADF&G biologists - would be allowed to shoot wolves from aircraft.

Why is public input on the proposals so limited, with no time for public review?! Also objectionable is the tactic further inhibiting public participation: BOG's meeting in Barrow, one of Alaska's most remote and difficult-to-access cities. People from the Kenai and Southcentral Alaska - those directly affected by the proposals - will have virtually no opportunity for in-person input. This is outrageous!!

I join with others who are paying attention in asking the BOG to postpone action on the proposals until its January meeting in Anchorage, when residents directly affected by the measures would have a fair opportunity to have their voices heard.

Seems like this would be the right thing to do.

Mary La Fever
40+ year Alaskan in Anchorage



To whom it may concern:

I am an Alaskan resident and I strongly oppose BOG 35 & 36 that would allow aerial wolf killing on the peninsula. The peninsula is known as "Alaska's Playground" and I believe this would make that statement false. Aerial wolf killing is not appropriate anywhere and it is certainly not appropriate in a heavy populated location. Visitors come to Alaska to experience wildlife and the implementation of this would take away from our culture.

Wolves are not a serious problem on the peninsula. There is no reason to kill a species to increase the population of another for the benefit of human hunting. It is selfish and irresponsible! Is this what the human race is coming to?

I am disgusted that this is allowed to happen anywhere in Alaska, and I am appalled that expanding this is being suggested. Please postpone the action on this proposal until residents of the peninsula can voice their opinion. These are the people who matter, not the ones who are suggesting this disgusting act.

Karma Torres



BOG proposals 35 & 36--oppose

- **Wolves are not the problem.** The Alaska Department of Fish & Game's own evidence presented to the BOG in March concluded that predation was not the cause of declining moose populations on the Kenai. So why target wolves?

In 15A, the ADF&G's own data concluded that poor habitat is responsible for fewer moose. So why target wolves?

In addition, much of Unit 15A is within the Kenai National Wildlife Refuge, federally managed land that is off-limits to Alaska's predator control programs. Targeting wolves in the remaining area would be inefficient and at best unlikely to affect moose populations.

In Unit 15C, according to the ADF&G's own analysis, moose populations are not declining. A cited low bull-to-cow ratio cannot be traced to wolf predation, and killing wolves does not negate hunters' prior overharvest of bull moose.

- **Aerial wolf killing will be highly visible, controversial, and is not an appropriate action** in an area that is heavily populated and a year-round recreation destination.
- **In both units aerial predator control is simply not practical.** Forested terrain makes tracking and shooting the wolves difficult. Landing a plane, in order to salvage a carcass or dispatch a wounded animal, is problematic and dangerous.
- **Any private citizen with a permit – not trained ADF&G biologists – will be allowed to shoot wolves from aircraft.**

Public input on the proposals will be severely limited. The BOG directed ADF&G to formulate aerial wolf control plans at its March 2011 meeting, but the plans were only very recently published for public review. Further inhibiting public participation, the proposals will be discussed and voted on at the BOG's meeting in Barrow, one of Alaska's most remote and difficult-to-access cities. People from the Kenai and Southcentral Alaska – those directly affected by the proposals – will have virtually no opportunity for in-person input.

We ask that the BOG to postpone action on the proposals until its January meeting in Anchorage, when residents directly affected by the measures would have a fair opportunity to have their voices heard

Amber Washington



BOG Proposals 35 and 36--OPPOSE Katherine Mitchell

Our children and grandchildren live on the Kenai. Please do not allow killing of wolves from the air. Aerial predator control of any type is not appropriate in this densely populated area.

Katherine Mitchell=



Oppose 35, 36

Wolves are an important part of the ecosystem.

Killing them is stupid.

Aerial shooting is inhumane. How can you be sure it is a clean kill?

Deb Russell



To the BOG

35, 36 Oppose

I am E. Lee North, Brightwaters, LI, NY Historian-Emeritus, author of "Eyes That Haunt," novel that required intense study (and admiration) of the wolves. I visited -- (and gave away my niece, Tammy North) in Kenai -- at Clam Gulch in the 1980s. I loved Alaska, Cook Inlet, and the Kenai Peninsula.

I sure hope that the subject proposals, which I believe would lead to violence from citizens shooting from aircraft at the wolves, are voted down. Please, gentlemen and ladies, do not pass these proposals.

Thank you,

E. Lee North, 55 woodland dr., Brightwaters, NY 11718.



RE BOG proposals 35 and 36. OPPPOSE

To whom it may concern,

Please convey my deep concern at the proposal to declare war on wildlife by the aerial shooting of wolves.

Apart from the disruption to the eco system and the suffering to the wolves, such action would cause grave risk to the public, and will give those involved carte blanche to do as they please.

Regards,

Peter Langley.



Oppose 35 and 36

To whom it may concern,

Killing wolves from the air on the Kenai or any other place within the state of Alaska for the sake of providing Moose hunting opportunities is both needless and unwarranted. Thousands of dollars are also provided by tourists and recreationalists in the State of Alaska because of its diverse wildlife, not just by hunters who live or come there to hunt. I urge the Board, to reconsider and develop a more humane plan that will provide for the welfare of both the wolves and the moose. I have lived in Alaska and have traveled extensively to and within that state and believe the people of that great state have always been proud of their independence and diversity, therefore lead the way and show the world how to care for and maintain your abundant wildlife in an honorable way.

Sincerely,
Steven Clevidence
Victor Montana



I write this letter to **oppose Proposal 35 and 36** that are being considered. Wolves are not the problem. Evidence presented by the Alaska Dept. of Fish and Game concluded that predation was not the cause of declining moose population on the Kenai. Why must wolves be targeted? In 15A, the ADF&G's own data concluded that poor habitat is responsible for fewer moose. So why must wolves be targeted?

The Alaskan wilderness must be left untouched. Please let the magnificent animals live in peace where they belong. I visited Alaska this past summer. I did not know these deplorable practices took place. I would have a difficult time returning if these proposals go thru. I hope this won't be the case.

Sincerely,

Linda Sampson
983 Valley Road
Franklin Lakes, NJ 07417



PROPOSALS 35 & 36 OPPOSE

To whom it may concern:

When I hear of such horrific needless slaughter of these wonderful wildlife beings, it makes me so saddened and angered. I Live here in southeastern Alaska-Juneau, and when these issues come to Fish and Game, how can it be. The last several years Friends and family who come to visit, they wish they could see some wolves. All visitors seem to whole-heartily really enjoy the wild life over all other reasons to come to Alaska. You ask their opinions, that's what brings the money to this state during tourist season.....THE WILD LIFE!!! This is CRAZY and I will ONLY VOTE for those with my beliefs.

Sincerely,
Susan Green



BOG PROPOSALS 35, 36 OPPOSE

**NO KILLING OF WOLVES ON THE KENAI! STOP ANTHROPOCENTRISM AND
CRUELTY TO MAMMALS THAT HAVE AS MUCH RIGHT TO LIVE AS HUMANS
DO!**

IRIS GALLEGOS



To the Alaska Board of Game:

Re: BOG proposals 35 and 36 - Implementing aerial wolf control in Game Management Units 15A and 15C, (parts of Kenai Peninsula)

Dear Sirs:

I strenuously **object** to the implementing of the above proposals.

-There continues to be no scientific or biological proof warranting such cruel cowardliness.

-Department of Fish & Game's own evidence presented to the BOG in March concluded that predation was not the cause of declining moose populations on the Kenai. In 15A, the ADF&G's own data concluded that poor habitat is responsible for fewer moose.

So why target wolves??????????????

-- As I understand it, any private citizen with a permit will be allowed to shoot wolves from the aircraft. I do not wish some untrained fool taking pot shots in rural / wilderness areas that are heavily populated by persons enjoying the year-round recreational opportunities found throughout the Kenai Peninsula.

-I most strenuously object to the Board of Game's cowardly decision to make proposals 35 and 36 public at a very late date. I urge to Board of Game to extend the period of time for public input in this matter.

-Lastly, on the 10 miles of the Kenai Spur Highway (running between Soldotna and Kenai), between August 10 and Oct 24, 2011, eleven moose have been killed by speeding motorists.

Isn't it about time we really do something about the real predators?????

Sincerely,

John Porter
34475 Forest Lane
Soldotna, AK



To a man whose mind is free there is something even more intolerable in the sufferings of animals than in the sufferings of man. For with the latter it is at least admitted that suffering is evil and that the man who causes it is a criminal. But thousands of animals are uselessly butchered every day without a shadow of remorse. If any man were to refer to it, he would be thought ridiculous. And that is the unpardonable crime. ~Romain Rolland, Nobel Prize 1915

"All beings tremble before violence. All fear death. All love life. See yourself in others. Then whom can you hurt? What harm can you do? ~Buddha"

All beings hate pains; therefore one should not kill them. This is the quintessence of wisdom: not to kill anything. -Sutrakritanga (Jainism)

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

Dear Sirs,

Could you explain the reason why the poor wolf is constantly targeted? Wolves are part of the eco-system and have been for centuries. They are social animals and live in family packs.

The reason you want to massacre these majestic animals is because of your desire to appease livestock farmers (voters), who presumably can't be bothered to protect their animals from predators.

This results in the wolf being the scapegoat for any loss of farmed animal, which is marginal. Have they never heard of husbandry! Also, you probably rely on hunters (more voters) who kill caribou and elk which the wolf relies on for their own supply of food.

Wolves are chased by thugs on snowmobiles, light planes, baited with poison, trapped, snared and are regarded in your country as public enemy No 1.

Tourists love to see wolves in their own environment but you prefer to issue licences for sadists to murder these beautiful animals.

It's about time you realise that one day the wolf will no longer exist due to your over-zealous desire to eliminate these highly intelligent animals and for what? No doubt when you've slaughtered all the wolves you'll find another species of animal to persecute. And so it goes on.

I ask that the BOG to postpone action on the proposals until its January meeting in



Anchorage, when residents directly affected by the measures would have a fair opportunity to have their voices heard.

These are my arguments:

- **Wolves are not the problem.** The Alaska Department of Fish & Game's own evidence presented to the BOG in March concluded that predation was not the cause of declining moose populations on the Kenai. So why target wolves?

In 15A, the ADF&G's own data concluded that poor habitat is responsible for fewer moose. So why target wolves?

In addition, much of Unit 15A is within the Kenai National Wildlife Refuge, federally managed land that is off-limits to Alaska's predator control programs. Targeting wolves in the remaining area would be inefficient and at best unlikely to affect moose populations.

In Unit 15C, according to the ADF&G's own analysis, moose populations are not declining. A cited low bull-to-cow ratio cannot be traced to wolf predation, and killing wolves does not negate hunters' prior overharvest of bull moose.

- **Aerial wolf killing will be highly visible, controversial, and is not an appropriate action** in an area that is heavily populated and a year-round recreation destination.
- **In both units aerial predator control is simply not practical.** Forested terrain makes tracking and shooting the wolves difficult. Landing a plane, in order to salvage a carcass or dispatch a wounded animal, is problematic and dangerous.
- **Any private citizen with a permit – not trained ADF&G biologists - will be allowed to shoot wolves from aircraft.**
- **Public input on the proposals will be severely limited.** The BOG directed ADF&G to formulate aerial wolf control plans at its March 2011 meeting, but the plans were only very recently published for public review. Further inhibiting public participation, the proposals will be discussed and voted on at the BOG's meeting in Barrow, one of Alaska's most remote and difficult-to-access cities. People from the Kenai and Southcentral Alaska – those directly affected by the proposals – will have virtually no opportunity for in-person input.

Sincerely,
Chantal Buslot
Belgium



Oppose 35 and 36

How is it possible that the BOG can justifiably ignore science just so hunters can have something to kill?

It's amazing to me how a state that prides itself on its natural beauty and wildlife and wild spaces is so eager to destroy it.

Please think long term and stop the expansion of "predator" control.

Thank you very much for your consideration.

ME Quimby



To Whom it may concern:

I strongly oppose BOG proposals 35 and 36 that would implement aerial wolf control in Game Management Units 15A and 15C, which include much of the western and southern areas of the Kenai Peninsula.

We ask the BOG to postpone action on the proposals until its January meeting in Anchorage, when residents directly affected by the measures would have a fair opportunity to have their voices heard.

I implore that whomever makes these decisions, at the very least, take the necessary time to read the attached link provided which outlines the importance of maintaining a healthy ecosystem, of which Wolves and top predators play a key role.

Decline in top predators and megafauna 'humankind's most pervasive influence on nature'

<http://www.ourfutureplanet.org/news/597>

Thank you for your time and consideration of this highly important and controversial subject matter regarding the future of wolf populations.

Sincerely,

Sherry Dion
726 River Road
Braeside, Ontario
K0A 1G0
Canada



Dear Alaska's Board of Game:

My name is Jeanne Fedel, I completely OPPOSE BOG proposals 35 and 36 that would implement aerial wolf control in Game Management Units 15A and 15C. In addition, I feel strongly that the American public's majority's wishes are being dismissed. As an educator, this worries me enough to stop and write this letter before leaving for my high school classes.

In Science and Government classes, my students have followed the decisions made by the BOG, and we are perplexed. Statistically speaking, we have not found one instance of a situation in which aerial hunting is biologically beneficial to the populations of predators or prey. The disruption to *all* wildlife is unpreventable, and stress is unduly placed on breeding/nursing individuals of all species. Aerial hunting does not promote natural selection, so should any individuals survive, their genetic pool has been drastically weakened. To use aerial hunting against wolves, one of the more pack-oriented of the canid family is also devastating to populations from a social standpoint. As someone who has had to study wolves to understand the management of many foster canids, I have seen how the stress of losing an alpha member to a pack or the losing of an important canid companion can cause a remaining animal's body to reject itself. Wild wolves may have more of a tolerance to the loss of a dominant pack member, but the fact remains that stress can cause an animal to feel poorly, and potentially result in causing an insufficient ability to care for itself.

Now, in regards to the American public? The American public--*and Alaska's own citizens*-- have consistently voted against aerial wolf hunts. For over fifteen years, since I have been monitoring BOG's decisions. How can you justify ignoring this fact? How am I to keep explaining it to our younger generations? At least have the decency to change the voting location to January, when the individuals who are going to be the most locally affected by this outrageous change to the hunting rules can more easily attend. You are not simply asking trained biologists to help pick off a few wolves; proposals 35 and 36 will permit any citizen to fire weapons out of an aircraft in an area that is trafficked by human locals and visitors alike. Many hunters are very responsible with their guns; however, the best hunters I know would never consent to an aerial hunt. Who will? The yahoos who want immediate gratification, and are not putting Alaska's best interest at heart.

Do what is best for all of Alaska. An aerial hunt will not magically promote an abundance of caribou; wolves have not been shown to be a primary threat to the caribou population, and in fact, do a much better job than man has at improving the caribou population through natural selection. An aerial hunt will not promote goodwill amongst the majority of the American --or even simply Alaska's-- general public. An aerial hunt is a clear demonstration of unwise politics in regards to conserving our national heritage.

Please vote no on Proposals 35 and 36. Keep the western and southern areas of the Kanai Peninsula free from aerial hunting.

Thank you,
Jeanne Fedel, California



To the Board of game [Alaska]
PROPOSAL TO 35, 36.....OPPOSE

I am submitting this letter in response to information I have received regarding a proposed wolf hunt in Alaska's Kenai Peninsula. The issue of aerial wolf hunting is a long-standing problem for most ethical, humane, and biologically educated/aware folks!

The current attempts to control wolves has no verifiable scientific basis to it. The Alaska Department of Fish and Game has presented information to the BOG that predation was not the cause of the decline in moose populations on the Kenai Peninsula.

Indeed, poor habitat is probably the reason for the lower numbers.

it should also be noted that the Kenai national wildlife refuge is off-limits to predator control programs and targeting wolves in remaining areas is at best ineffective and misguided. Finally and most importantly it should be noted that the low bull- to -cow ratio is probably related to overhunting. This is based on the Alaska Department of Fish and game's own analysis!

The area of proposed wolf killing is a heavily used recreation destination and thus a totally inappropriate area to engage in this type of slaughter. The forested terrain makes it difficult to land, track, or dispatch a wounded animal. It is thus and extremely dangerous undertaking.

The fact that any private citizen with a permit can engage in this activity [and not a trained biologist] makes it an exercise of amateur incompetent wildlife hunters and there have been well-documented incidents of sadism and extremely cruel killing of these magnificent animals. Of note is the case of Dr. Jack Frost back in the 90s I believe ,who prided himself with a particular cruel heinous way of killing an animal and bragging about it on his radio. Fortunately the wildlife people were able to intercept and track his conversation. The rest of the story is gruesome and further evidence of endangered species that he had killed illegally were found in his refrigerator. I guess what I'm trying to say that all types of sordid, sadistic individuals will be drawn into this bloodbath. Dr. Frost is not the only one and there have been other instances of this horrible abuse.

Finally the attempt by the BOG to inhibit public participation in determining whether or not the hunt is appropriate and warranted is despicable & unethical. The manipulation of location of the BOG's meeting to Barrow Alaska [one of the most remote and difficult to access cities] and not provide the people from Kenai and south-central Alaska who are directly affected by the proposals and opportunity for local input is highly suspect. Residents need to have a fair opportunity to make their voices heard and the manipulation of the timing to the point where limited number of people may have the information at hand, and restricting it to a location out of the area in question [barrow] is unethical, immoral and downright disgusting.

I ask that the issue be discussed in a March 2011 meeting after allowing folks that live in the area to review the plan and provide input given the information we know from valid scientific studies done by the Alaska Department of Fish and game.



As an addendum, I might add this sounds awfully much like the “tick” control programs that have been instituted around a few areas in the Northeast and are highly controversial. there has been no scientific and medical evidence to support the culling of deer as causing a drop in the incidence of Lyme disease. Yet based on political pressure from hunting groups & uneducated hysterics, bow hunters are currently engaged in this useless and cruel activity despite the outcry of many concerned citizens.

It makes one wonder how much of the aerial wolf hunting [which is been highly controversial for at least 50 years] is backed by political lobbies..... hunters and wolf haters! Certainly not scientists, biologists and ethical humane folks who understand the complex biology and need for this magnificent predator in a healthy ecosystem.

Thank you for your time and interest

Dr. I de Baintner MD FACSM (MAJ.USAF. retired)
Dover, MA 02030



Oppose 35, 36

TO WHOM IT MAY CONCERN:

Airborne killing is for weaklings and cowards!!! I don't think a lot of Alaskans are considering themselves as such!!!

If you want to hunt, i.e. kill wolves (not that I think that it is warranted as when the food supply decreases, so decreases the # of wolves), do it from the ground as it was done in the old days.

I detest people that MURDER wolves from the air!!! There is no justification for it!!!
None, absolutely none!!!

Horst-Helmut Meissner, M.D.



Oppose 35 and 36

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

To the Board of Game:

I strongly urge the Board to defeat both proposals 35 and 36 which would implement aerial wolf control in Game Management Units 15A and 15C in the Kenai Peninsula. They represent a step backwards in responsible game management, as does any aerial wolf control. Evidence presented to the BOG by the Alaska Department of Fish and Game concludes that predation is not the cause of declining moose populations on the Kenai. Targeting wolves is not the answer. Poor habitat in 15A is responsible for fewer moose. Further, much of Unit 15A is within the Kenai National Wildlife Refuge, and therefore off-limits to Alaska's predator control programs. Targeting wolves in the remaining area would be inefficient and likely would not affect moose populations. With regard to Unit 15C, the ADF&G's analysis shows moose populations are not declining. Overharvest of bull moose by hunters, not wolf predation, has caused any low bull-to-cow ratio.

Aerial wolf killing is an atrocious, highly visible, and controversial practice that is not appropriate in a heavily populated area and a year-round recreation destination. Aerial predator control is impractical in both units, where forested terrain makes such action difficult and downright dangerous. It is appalling that any private citizen with a permit, rather than trained biologists, would be allowed to shoot wolves from aircraft. It is unfortunate and disappointing that public input on the proposals will be severely limited, as the plans were only very recently published for public review and will be voted on in the remote city of Barrow. I urge the BOG to postpone action on the proposals until its January meeting, when residents directly affected by the measures would have a fair opportunity to be heard.

It is time to end this ill-advised practice that is unsupported by all available evidence and to address the actual causes of the decline in moose population. Again, I urge the Board of Game to defeat proposals 35 and 36.

Lynn Driessen



To BOG

Oppose 35, 36

PLEASE, stop this senseless and grossly inhumane aerial
slaughter of wolves!!!

Brian Smith
Homer, AK



Oppose 35, 36

To whom it may concern:

My name is Marc Cooke and I would like to leave several comments on your proposed aerial wolf hunt.

We all know aerial gunning of wolves and other predators does not work. Wolves are not the problem as was the conclusion of Alaska's Department of F&G has mentioned in prior research reports. Poor area habitat is the major factor in the declining moose numbers. It is not in the best long term interest to artificially attempt to increase moose population numbers at the expense of another creature...the wolves. Then only allow hunters to target those moose for hunting.

I also believe that much of this area is off limits (15A) to killing of wolves and other predators???? How can this be acceptable? Its not! Sadly in 15C you make the claim that moose populations are not declining and in the past have been over hunted/harvested.

Aerial hunting is not fair chase and I find it nothing short of very disturbing and unsportsmanlike. I visit Alaska often and enjoy the company of wolves and other predators. It makes up some of my best photos! This area is very rugged and not good terrain to hunt wolves. What will happen if you would wound a wolf? Do you try and land and end its life? I don't think so...it tough terrain so this leads me to believe that you would just leave the animal to suffer. My father and my father's fathers taught me to be an ethical hunter. This too, I find very disturbing and is wrong! How can it be safe and legal to allow any so called hunter to hang from a moving aircraft and kill or wound wolves? You people have this incorrect on so many levels its mind boggling!

Public input is very clear. **DONT ALLOW THIS TO PROCEED!** Do what the overall public wants and not just what special interest groups want.

If you have any questions or comments for me, I can be contacted at the below address.

Thank you for considering my comments.

Marc Cooke
3427 Rome Lane
Stevensville, Montana 59870



Dear sirs

I OPPOSE proposals 35 and 36 these proposals, which artificially try to increase the moose population for hunters, are not biologically sound. My family and I love to visit some of the areas where aerial predator control may take place and I can tell you I won't bring my girls there with that type of predator control taking place its just not safe. It is especially disturbing that non- biologists and any individual can shoot wolves from an aircraft , are you trying to destroy the tourist industry?

Mark Balitzer
San Diego, Ca



Please enter as testimony in opposition to BOG proposals 35 and 36.

Conditions in Game Units 15 A and 15 C do not appear to warrant the killing of wolves to solve game availability issues. Both of these units have conditions that need addressing, but are unrelated, or only slightly related to wolf predation according to ADF & G's own information.

In Game Unity 15 A, the problem is poor habitat. Increasing moose in an area that already has poor habitat is not going to improve it. Possibly the area could use a 'rest' from being so heavily browsed. This solution could actually put the wolf predation to use assisting in recovery of the area.

In Game Unit 15 C, the problem according to ADF&G's own data, is a low bull to cow ratio. This appears to be related to the issuing of hunting permits, and the choice hunters are making when selecting a target. The BOG and ADF&G should make some in-house adjustments rather than blaming the problem on wolves.

Please defeat these two proposals: 35 and 36. Also an issue like this would more appropriately be handled at a meeting near the area affected. It tends to make the public think that the BOG is slipping something past them, when issues like this are taken up at meetings that cannot be accessed by local residents.

Thank you.

Martha Siebe
8700 Solar Drive
Anchorage, AK 99507



To Whom It May Concern,

My name is Maria Torres and I OPPOSE Alaska's BOG proposals 35 and 36.

Your state's practice of aerial wolf killing is inhumane, unnecessary, controversial and frowned upon by everyone in the lower 48. Aside from the fact that authorizing any private citizen with a permit to shoot at defenseless wolves in heavily populated areas is dangerous to civilians (not to mention cowardly), the end simply does not justify the means. That is, Alaska Department of Fish & Game's own findings, which were presented to the BOG in March, concluded that wolves were not the cause of declining moose populations on the Kenai.

Please do not allow these proposals to go through. Aerial wolf killing is a sickening and archaic practice that has to be stopped.

Respectfully,

Maria Torres
1550 Platte St. #162
Denver, CO 80202



Dear BOG: (oppose 35 and 36)

Hello and greetings from California. My name is Kristi Machon. I am writing to you with great concerns regarding the airborne wolf killing in Kenai. Could you please take a moment to review my email? Thank you in advance for your time.

- **Wolves are not the problem.** The Alaska Department of Fish & Game's own evidence presented to the BOG in March concluded that predation was not the cause of declining moose populations on the Kenai. So why target wolves?

In 15A, the ADF&G's own data concluded that poor habitat is responsible for fewer moose. So why target wolves?

In addition, much of Unit 15A is within the Kenai National Wildlife Refuge, federally managed land that is off-limits to Alaska's predator control programs. Targeting wolves in the remaining area would be inefficient and at best unlikely to affect moose populations.

In Unit 15C, according to the ADF&G's own analysis, moose populations are not declining. A cited low bull-to-cow ratio cannot be traced to wolf predation, and killing wolves does not negate hunters' prior overharvest of bull moose.

- **Aerial wolf killing will be highly visible, controversial, and is not an appropriate action** in an area that is heavily populated and a year-round recreation destination.
- **In both units aerial predator control is simply not practical.** Forested terrain makes tracking and shooting the wolves difficult. Landing a plane, in order to salvage a carcass or dispatch a wounded animal, is problematic and dangerous.

Best,

Kristi Machon



Oppose 35, 36

No killings of wolves from airplanes

Anthony Conforti



Dear Board of Game Members,

I am an Alaska resident and I do not support increased measures against wolves in Kenai. I **oppose Proposals 35 and 36**; Fish and Game has already publicly announced that the proposed measures will do nothing.

Please follow the guidance of our trained biologists and do not proceed with these proposals.

Thank you.

Janice Golub
POB 35096
Fort Wainwright, AK 99703



To the BoG:

I strongly urge the denial of proposals 35 and 36. The nature of the situation in the Kenai is not one of over-predation but rather a limiting factor of forage. Thus, no matter how many predators are killed the increase, if any, in moose would only be temporary and lead to a crash.

Aerial hunting of wolves was supposedly started as an emergency response to a specific population situation but it is now becoming the de facto method of game management despite its brutality and total lack of scientific justification. Instead, it is practiced to aid non-residents in their trophy hunting and has little to do with the actual situation.

Instead of aerial hunting, it might be better and wiser to actually practice good wildlife management in the area.

...Art Greenwalt, Fairbanks



October 27, 2011

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

Dear Board of Game:

I am writing to you to express my vehement **opposition to BOG proposals 35 and 36** which propose to implement aerial wolf control in Game Management Units 15A and 15C which includes much of the western and southern areas of the Kenai Peninsula. I oppose this action because ADF&G's own scientific data, presented to the BOG in March, implies that poor habitat is largely responsible for the decline of moose populations – not wolf predation.

It is my understanding that Kenai National Wildlife Refuge (Unit 15A) is federally managed land, and as such, it should remain off limits to any kind of predator control programs. As for the remaining areas, predator control will likely be ineffective and unlikely to positively affect moose populations.

As for Unit 15C, it has been reported that moose populations are not declining, according to ADF&G's own analysis. A reported low bull-to-cow ratio has not been linked to wolf predation. More likely, this decline is the result of years of hunters' prior over-harvest of bull moose. Are hunters entitled to *every* game animal in the woods? That sense of entitlement is reflected in environmental destruction across the board. Restraint, rather than entitlement, is what has protected most of the wild places we enjoy today. Restrictions on development, for instance, result in more open space and public use areas, which make our human communities healthier and increase our quality of life. Similarly, restraint is important in preserving native wildlife. Hunters who feel entitled to hunt as many animals as they want, and thus advocate for the destruction of native predators, turn a blind eye to ecosystems out of balance, the general health of the wild lands we hold precious and the rights of other citizens who value the role of predators in the maintenance of our environment. *None of us are so entitled.*

Finally, aerial wolf killing is impractical and dangerous; any private citizen with a permit – not trained ADF&G biologists - will be allowed to shoot wolves from aircraft and that concept is totally unacceptable and violates every principle of national security. This practice is also a highly visible and controversial measure that will certainly impact recreational visits from tourists who visit Alaska for its wildness and wildlife watching.

It is my understanding that public input regarding this proposal is limited. I urgently request that the BOG postpone action on the proposals until its January meeting in Anchorage, when residents directly affected by the measures would have a fair opportunity to have their voices heard.

Respectfully submitted,
Diane Bentivegna
Diane Bentivegna



Oppose 35 and 36

On behalf of my family, including 7 voting adults and numerous children--all of whom travel each summer :

Wolf hunting by air is not only cruel, unethical and immoral; it is unsporting and cowardly. Your attempt to make more ungulates available to hunters by eliminating predators makes Alaska--which we know to be beautiful and even have some very nice people as residents--seem like a primitive example of what happens when the fox is in charge of the henhouse.

Too many hunters, too few predators: We'll not be taking our Airstream to Alaska again until this stops. Tony Knowles allowed us this privilege; since his days in office, your State is a national embarrassment.

Sincerely
the Zucker family



Sirs and Ma'ams,

I would like to voice my strong opposition to the BOG Proposals 35 and 36.

- **Wolves are not the problem.** The Alaska Department of Fish & Game's own evidence presented to the BOG in March concluded that predation was not the cause of declining moose populations on the Kenai. So why target wolves?

In 15A, the ADF&G's own data concluded that poor habitat is responsible for fewer moose. So why target wolves?

In addition, much of Unit 15A is within the Kenai National Wildlife Refuge, federally managed land that is off-limits to Alaska's predator control programs. Targeting wolves in the remaining area would be inefficient and at best unlikely to affect moose populations.

In Unit 15C, according to the ADF&G's own analysis, moose populations are not declining. A cited low bull-to-cow ratio cannot be traced to wolf predation, and killing wolves does not negate hunters' prior overharvest of bull moose.

- **Aerial wolf killing will be highly visible, controversial, and is not an appropriate action** in an area that is heavily populated and a year-round recreation destination.
- **In both units aerial predator control is simply not practical.** Forested terrain makes tracking and shooting the wolves difficult. Landing a plane, in order to salvage a carcass or dispatch a wounded animal, is problematic and dangerous.
- **Any private citizen with a permit – not trained ADF&G biologists - will be allowed to shoot wolves from aircraft.**

Public input on the proposals will be severely limited. The BOG directed ADF&G to formulate aerial wolf control plans at its March 2011 meeting, but the plans were only very recently published for public review. Further inhibiting public participation, the proposals will be discussed and voted on at the BOG's meeting in Barrow, one of Alaska's most remote and difficult-to-access cities. People from the Kenai and Southcentral Alaska – those directly affected by the proposals – will have virtually no opportunity for in-person input.

Thank you very much for your time and consideration.

Respectfully,
Gregory "Gregg" Haussmann



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

35, 36 Oppose

There is no scientific basis to human managed predator control. Nature controls predator populations by balancing their numbers with those of their prey. Numerous scientific studies have shown that suppression of predators makes for unhealthy herbivores which, ultimately, will reduce ungulate populations.

I implore you not only to dismiss any thought of expanding deadly aerial wildlife management but to end the practice all together. Humans are NOT experts at creating balance in the wilderness. The Earth itself will take care of its own.

Thank you for your consideration.

Mary Jo Graham

Founder/Director
Oakmoss Education
2092 Mill Road
West Falls, NY 14171-9710



I OPPOSE BOG proposals 35 and 36.

It seems that when the consumptive users want to enact a proposal, 'science based game management' is loudly trumpeted. The evidence in this case shows loss of habitat as the primary contributor to low moose populations.

WHERE IS THE SCIENCE BASED GAME MANAGEMENT HERE? Or maybe we should call a spade a spade - "politics based game management".

--

--Scott

The best long distance runners eat raw meat, run naked and sleep in the snow.

--From an Alaska Airlines ad



Oppose aerial wolf killing in the Kenai

**Carol Biggs
PO Box 20271
Juneau AK 99802**

Earth has evolved over billions and billions of years, self correcting and balancing itself continually.

At best, human intervention in natural systems causes natural system delays in correcting imbalances.

Earth doesn't need humans trying to correct and adjust natural system imbalances when nature-disconnected humans are not capable of understanding how nature works in harmony and balance with the whole system's health in mind over long periods of time.

Killing more wolves in the Kenai is not going to improve the moose population if human hunters are the problem, or, as in 15A, the ADF&G's own data concluded that poor habitat is responsible for fewer moose.

It's pretty obvious that if there's not enough food for moose, there will be fewer moose, as well as fewer wolves, as well as fewer of all creatures who are dependent on their sustenance from nature.



Oppose 35, 36,
Dear Sir,

I request you to please stop the aerial hunt of the predator species, wolves because of the pointers below.

I request that the BOG to postpone the decision on aerial killing of wolves until its January meeting in Anchorage, when residents directly affected by the measures would have a fair opportunity to have their voices heard.

Some pointers to stop this aerial hunt:

- **Reduces tourism.** This visible hunt will spread across and reduces the tourism to Alaska since there are a lot of people who will be opposed to this visible hunt.
- **Wolves are not the problem.** The Alaska Department of Fish & Game's own evidence presented to the BOG in March concluded that predation was not the cause of declining moose populations on the Kenai. So why target wolves?
In 15A, the ADF&G's own data concluded that poor habitat is responsible for fewer moose. So why target wolves?
In addition, much of Unit 15A is within the Kenai National Wildlife Refuge, federally managed land that is off-limits to Alaska's predator control programs. Targeting wolves in the remaining area would be inefficient and at best unlikely to affect moose populations.
In Unit 15C, according to the ADF&G's own analysis, moose populations are not declining. A cited low bull-to-cow ratio cannot be traced to wolf predation, and killing wolves does not negate hunters' prior overharvest of bull moose.
- **Aerial wolf killing will be highly visible, controversial, and is not an appropriate action** in an area that is heavily populated and a year-round recreation destination.
- **In both units aerial predator control is simply not practical.** Forested terrain makes tracking and shooting the wolves difficult. Landing a plane, in order to salvage a carcass or dispatch a wounded animal, is problematic and dangerous.
- **Any private citizen with a permit – not trained ADF&G biologists - will be allowed to shoot wolves from aircraft.**
- **Public input on the proposals will be severely limited.** The BOG directed ADF&G to formulate aerial wolf control plans at its March 2011 meeting, but the plans were only very recently published for public review. Further inhibiting public participation, the proposals will be discussed and voted on at the BOG's meeting in Barrow, one of Alaska's most remote and difficult-to-access cities. People from the Kenai and Southcentral Alaska – those directly affected by the proposals – will have virtually no opportunity for in-person input.

Thanks, Ravi Madapati



Oppose 35, 36

Why target wolves? They aren't causing any predation problems, and they are an important part of the ecosystem. If you are not convinced of this, please review what happened to Yellowstone Park, which suffered greatly when the wolf, a cornerstone species, was eliminated for decades. Killing wolves is not a solution to any kind of problem,

Irene Brady
9647 Wagner Creek Road
Talent, OR 97540



35, 36 oppose

To Whom It May Concern,

I am writing to voice my concern and opposition regarding the proposal for aerial wolf hunting. This action is not scientifically warranted. Furthermore the Kenai is heavily populated and there is great risk for error when shooting from an airplane posing great risk to the residents in the region. The public has voted on this issue on more than one occasion we do not want this practice to continue and certainly do not want the see the program expanded.

Sincerely,
Meredith Autrey



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

October 28, 2011

I am writing in opposition of proposals 35 and 36 which would implement aerial killing of wolves in Game Management Units 15A and 15C of the Kenai Peninsula.

Ostensibly these proposals are to increase moose population in areas where the decrease in the population of moose is due to habitat depletion from lack of fires and increase of human population, not due to wolf predation. This is not a wolf problem, but a habitat problem. Killing wolves will not solve this problem, but in retrospect increase the problem. Historically reintroduction of wolves in other areas of our nation, where wolves had been exterminated, have proved to increase the healthy biodiversity of an area. Take in to account Yellowstone National Park and the North Woods, Boundary Waters of Minnesota.. And in recent years the Blue Ridge River area of Southeastern Arizona.

I further oppose these proposals for the following reasons:

1. Much of Unit 15A is within the Kenai National Wildlife Refuge, federally managed land that is off-limits to Alaska's predator control programs. Targeting wolves in the remaining area would be inefficient and at best unlikely to affect moose populations.
2. In Unit 15C, according to the ADF&G's own analysis, moose populations are not declining. A cited low bull-to-cow ratio cannot be traced to wolf predation, and killing wolves does not negate hunters' prior overharvest of bull moose.
3. Any private citizen with a permit – not trained ADF&G biologists – will be allowed to shoot wolves from aircraft.
4. Public input on the proposals will be severely limited. The Board of Game directed ADF&G to formulate aerial wolf control plans at its March 2011 meeting, but the plans were only very recently published for public review. Further inhibiting public participation, the proposals will be discussed and voted on at the BOG's meeting in Barrow, one of Alaska's most remote and difficult-to-access cities. People from the Kenai and Southcentral Alaska – those directly affected by the proposals – will have virtually no opportunity to attend this meeting. Thus prevented in person input.

I am hereby asking the Board of Game postpone action on the proposals until its January meeting in Anchorage.

Thank you for considering my comments and concerns,

Sincerely
Sharon Baur
4275 Kachemak Way
Homer, AK 99603



Oppose proposals 35 and 36

WHY!????? This is a horrible thing to do. Leave the wolves alone. Let the balance of nature work it's course. Human intervention has screwed up all of this. I cannot believe you must resort to such barbaric tactics.

LEAVE THE WOLVES ALONE!!!!

Donna Quante
Willow, AK=



Oppose 35, 36

The proposal for the ugly activity of killing wolves from aircraft has appeared again.

Not only is it a cowardly "sport", but it is biologically unsupportable. The wolf predation of moose, caribou, and deer is always exaggerated for the sake of justifying the killing. As usual, greed is at the basis of the faulty ideas that fewer wolves, mean more game means more hunters means more revenue.

In my opinion, there are more tourists who travel to Alaska , bringing revenue, to observe and appreciate the wolves than there are hunters who travel there to kill moose. In the end, the balances established in nature will provide sufficient ungulate populations without persecuting the wolves, which will compensate for their losses by increasing their fecundity, as have populations of coyotes. A vote NO on the proposal is logical and humane.

John H. Tyler, Ph.D.
Half Moon Bay, CA=



Attention Alaska Board of Game Members,

I am greatly opposed to the proposals 35 and 36 which legalize aerial wolf hunting by anyone with a license to take part in this cruel and needless practice.

I say cruel because it tortures the animals by running them down without mercy if one was so inclined; cruel because accuracy is difficult even if prioritized making non-fatal wounds and needless suffering a high probability. The Kenai terrain would not always allow for landings allowing shooters to complete a kill or collect the animals once shot. I understand the wish to increase the moose herds and I also understand that the wolves are not shown to be the problem, in fact, removing wolf populations may actually damage the moose herds by disallowing for natural selection etc. With habitat and low bull numbers shown as the key problems this effort to brutally run down and kill wolves is not necessary.

There are other methods the Board can take to concretely demonstrate their efforts to manage Alaska's game in a sound and balanced way which provides for the well being of all Alaskan species far into the future.

Please, keep aerial wolf hunts out of your plans. At the very least, I ask that the BOG postpone action on the proposals until its January meeting in Anchorage, when residents directly affected by the measures would have a fair opportunity to have their voices heard.

Thank you,

Bonnie McCartney
10249 Tartan Circle
Anchorage, AK
99507



BOG PROPOSAL 35 & 36 IN UNITS 15 a AND 15 c

I ABSOLUTELY AND STRONGLY OPPOSE ANY GAME MANAGEMENT IN THE AFORE MENTIONED GAME UNITS. THE USELESS AND UNNESSARY KILLING OF OUR BEAUTIFUL ALASKA WOLVES IS TOTALLY RIDICULOUS. LEAVE THOSE ANIMALS ALONE, YOU'RE ONLY DOING IT TO TRY AND PROVIDE MORE MOOSE FOR THOSE RICH HUNTERS. NATURE WILL TAKE BETTER CARE OF THE ANIMAL BALANCE THAN "EDUCATED" PEOPLE...

I SAY NO AND NO AGAIN.

THANK YOU ,

christa burg



Oppose 35 and 36

- **Wolves are not the problem.** The Alaska Department of Fish & Game's own evidence presented to the BOG in March concluded that predation was not the cause of declining moose populations on the Kenai. So why target wolves?

In 15A, the ADF&G's own data concluded that poor habitat is responsible for fewer moose. So why target wolves?

In addition, much of Unit 15A is within the Kenai National Wildlife Refuge, federally managed land that is off-limits to Alaska's predator control programs. Targeting wolves in the remaining area would be inefficient and at best unlikely to affect moose populations.

In Unit 15C, according to the ADF&G's own analysis, moose populations are not declining. A cited low bull-to-cow ratio cannot be traced to wolf predation, and killing wolves does not negate hunters' prior overharvest of bull moose.

- **Aerial wolf killing will be highly visible, controversial, and is not an appropriate action** in an area that is heavily populated and a year-round recreation destination.
- **In both units aerial predator control is simply not practical.** Forested terrain makes tracking and shooting the wolves difficult. Landing a plane, in order to salvage a carcass or dispatch a wounded animal, is problematic and dangerous.
- **Any private citizen with a permit - not trained ADF&G biologists - will be allowed to shoot wolves from aircraft.**
- **Public input on the proposals will be severely limited.** The BOG directed ADF&G to formulate aerial wolf control plans at its March 2011 meeting, but the plans were only very recently published for public review. Further inhibiting public participation, the proposals will be discussed and voted on at the BOG's meeting in Barrow, one of Alaska's most remote and difficult-to-access cities. People from the Kenai and Southcentral Alaska - those directly affected by the proposals - will have virtually no opportunity for in-person input.

We ask that the BOG to postpone action on the proposals until its January meeting in Anchorage, when residents directly affected by the measures would have a fair opportunity to have their voices heard

Thanks, Leslie Davies



35, 36 oppose

I write to voice my opinion concerning the BOG's proposal to conduct predator control on the Kenai Peninsula-- I am wholeheartedly against such proposal! There is absolutely no scientific reason for doing so.

Plus, I recreate there on a regular basis and any sort of aerial predator control is totally inappropriate. The BOG must stop catering to the people who want to turn Alaska into a game farm!!!

Brad De Noble
32323 Mt. Korohusk Cir.
Eagle River, AK 99577



I Matthew Thompson oppose the Alaska Board of Game proposals 35 and 36.
Predation is not the leading cause of moose populations on the Kenai Peninsula.
Unit 15 A is on the Kenai Wildlife refuge, Federal Lands, and is closed to predator
control programs.

We need to increse moose habitat and forage to solve this problem.

Matthew Thompson



Oppose 35, 36

please stop the aerial killing of wolves

Fran Greenaway



Oppose 35, 36

Alaska Department of Fish and Game
Boards Support Section

Regarding areial wolf hunts, we already know that wolves are not the problem. The Alaska Department of Fish & Game's own evidence presented to the BOG in March concluded that predation was not the cause of declining moose populations on the Kenai. So why target wolves?

In 15A, the ADF&G's own data concluded that poor habitat is responsible for fewer moose. So why target wolves?

In addition, much of Unit 15A is within the Kenai National Wildlife Refuge, federally managed land that is off-limits to Alaska's predator control programs. Targeting wolves in the remaining area would be inefficient and at best unlikely to affect moose populations.

In Unit 15C, according to the ADF&G's own analysis, moose populations are not declining. A cited low bull-to-cow ratio cannot be traced to wolf predation, and killing wolves does not negate hunters' prior overharvest of bull moose.

Most constitutents and a large percentage of the US population oppose aerial wolf killing. Aerial wolf killing will be publicized, is highly visible, controversial, and is not an appropriate action in an area that is heavily populated and a year-round recreation destination.

In both units aerial predator control is simply not practical. Forested terrain makes tracking and shooting the wolves difficult. Landing a plane, in order to salvage a carcass or dispatch a wounded animal, is problematic and dangerous for all involved

Any private citizen with a permit â€œ not trained ADF&G biologists - will be allowed to shoot wolves from aircraft. This is clearly not beneficial from any angle.

Sincerely,

Debbie Brush
Castle Rock, Colorado



My Name is Johanna Bakker
PO Box 211403
Auke Bay Alaska 99821

I am commenting on Proposal #35

I oppose this proposal

Wolves are not the problem

According to the Department of Fish and Game, predation by wolves is not the cause of the declining moose population in the Kenai's Unit 15A.

Poor habitat is.

I am commenting on Proposal #36

I oppose this proposal

Wolves are not the problem

According to the Department of Fish and Game the moose populations are not declining in Unit 15C and the low bull cow ratios can not be traced to wolf predation, but to an over harvest of bull moose by hunters.

So why target the wolves?.

They are not the problem



Oppose 35, 36

Dear BOG Members,

This letter is in response to your new proposals 35 and 36 which would allow aerial wolf control on the Kenai Peninsula in GMU15A and 15C. Your board has heard the same arguments from opponents over and over again and have rarely changed your intentions, so I consider this letter a complete waste of time on my part.

I would like to commend you on your choice of locations to hold this meeting - Barrow. Very good choice indeed. It will allow almost no actual voice of dissension to be heard from the Kenai Peninsula. The main attendees will likely be locals from Barrow and sponsored hunting organization representatives who will likely write the trip expenses off as a business expense and will rabidly support your grandiose expansion of predator control. Kudos to you.

Not that you seem to care at all about what the general public feels about these issues, but think about what will happen when a group of skiers or snowmachiners are out in the "wilderness" of the Kenai and a plane buzzes by with a gunner hanging out the door blazing away at an evil wolf. That would make for quite a nice YouTube video don't you think? You betcha.

In relation to the bull / cow inequality, the relative low bull numbers can hardly be traced to predation by wolves. As us Alaskans see every year on the banners of ADN and on our drives home , it is an Alaskan "right" to shoot the biggest bull and brag about it to the world. Evolution, yes I know it is an evil word, sorry, dictates that the biggest and strongest of bulls will live the longest and breed with the most females, thus passing on superior traits. A trophy hunter will take this genetically superior moose out of the chain with one shot. Wolves obviously do eat moose in order to survive, but most studies that I have seen indicate that wolves generally take weak moose, not mature bulls. There are exceptions to this of course.

As I can only assume that you know, there are many factors why an area can have a lower than "desired" moose population. Browse, weather, hunting pressure, road kill, and fire suppression, just to name a few.

The following are random thoughts but none the less here they are. It will be interesting to see the outcome of the increased bear baiting, in the GMU across from Anchorage, of both black and brown bear as well. We have all been taught, a food conditioned bear is a problem bear. I wonder if someday, some inventive family will bring suit on the State for allowing bear "feeding," when their loved one is mauled by a bear that has been spending time at a bait station or when their loved one is killed in a vehicle collision because moose numbers magically become so high that many more are killed by vehicle collisions. These suits may not win but would be entertaining indeed.

Once again, your intention to let Joe Public buzz around in his fancy little plane and shoot at will is somewhat inappropriate. Yes, I know, your way around that is to let your gunners/scientists, do the shooting, so I guess it really does not make a difference does it. I



guess it might be a little harder to get the public to approve of you plan if they have to actually pay for it.

In conclusion, good luck with your expansion as we all know it will happen despite any opposition. Maybe someday this BOG will be gone and some sanity will return to "wildlife management."

Sincerely,

Bob Gengler
Eagle River, AK



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

Oppose 35 and 36

Aerial wolf killing is once again being proposed by the BOG as a viable option for predator control. Once again, I am NOT in support. BOG proposals 35 and 36 would allow any citizen with a permit to hunt from an aircraft in Game Management Units 15A and 15C. This seems incredibly dangerous knowing how populated the Kenai Peninsula is year round. Not to mention that the terrain is heavily forested and it would be impossible to land an aircraft let alone track an injured animal or remove a dead carcass. What a logistical nightmare! In addition, does the BOG really want such a visible, controversial and inappropriate predator control program taking place over the heads of the very people who visit the Kenai peninsula every year and spend millions of tourist dollars? Finally, at the meeting in March 2011, the ADF&G presented to the BOG conclusive evidence that predation was not the cause of declining moose populations. They outlined that poor habitat was the main cause of declining moose populations in 15A.

Also, 15A is within the Kenai National Wildlife Refuge which is off limits to predator control because it is a managed Federal land.

During the same BOG meeting in March 2011, ADF&G concluded that moose populations were not declining in the 15C Unit. To conclude, it is recommended that the BOG postpone their decision until their January meeting in Anchorage so the residents of Kenai Peninsula and southern Alaska can have an opportunity to comment on this very controversial proposal. No to BOG proposals 35 and 36.

Sincerely,
Linda Taylor



I am opposed to the BOG proposals 35 and 36 to authorize aerial wolf killing.

Wolves are not the problem as ADF&G has stated the decline in moose numbers is due to poor habitat. There is no sufficient rationale for this poorly thought out, brutal and unnecessary action. It is pure slaughter and the BOG should not let it happen.

Sincerely,

Susan Valenti



Attn: Board of Game Comments
AKDF&G
Boards Support Section

I strongly **oppose 35 & 36** for many reasons. Here are 2:

1) These proposals are not needed and will not be effective. Much of Unit 15a is within the Kenai Wildlife Refuge where aerial hunting not allowed. And the ADF&G has already analyzed that the moose population is not declining in Unit 15c. No reason to have any citizen or novice hunter out there trying to kill wolves and avoid shooting the many families with kids and dogs out there using these recreational lands. These proposals are not practical for densely populated Kenai areas. My Kenai friends are especially dedicated to their lands and year round recreational pursuits and will not stand for being in a war zone. Also the Kenai terrain makes it super difficult to land planes to salvage wolf bodies or deal humanely with wounded wolves.

2) The whole concept of aerial wolf killing and expanding it is repugnant to a growing number of Alaskans and people across the country. There is a tide of negative state & national opinion about this practice. It is too controversial. It is considered in the same league of greed and inhumane behavior that the whole country is now deeply discussing: when a small group of people impose their values to increase revenues/profits. In this case it is revenues from moose hunting at the expense of wildlife stewardship. It's a 99% widely held value not to have a war against our wolves. Thank you for considering these points.

Lin Davis
3099 Nowell Ave
Juneau, Ak 99801



To whom it may concern,

Pleaese block BOG proposals 35 & 36 and put a stop to the allowing of the atrocious acts of aerial wolf killing on the Kenai Peninsula of Alaska.

Thank you for your attention.

Peter McCallum
Mountain View, CA



Oppose 35 and 36

To Whom It May Concern:

I am writing to urge that the Board of Game postpone any action on aerial wolf hunting until its January meeting in Anchorage, when residents directly affected by the measures would have a fair opportunity to have their voices heard.

Wolves are not the problem, as shown by the Alaska Dept. of Fish & Game's own report to the BOG: wolf predation is not the cause of declining moose populations (if indeed they are declining--the evidence is inconclusive) on the Kenai; poor habitat is the cause. So why target wolves?

Further, aerial hunting is highly dangerous in a heavily used (recreation) area, especially when conducted by any private citizen with a permit!

Thank you for your attention to these concerns.

Sincerely,
Anthony Chiffolo



Oppose proposals 35 and 36

Alaska Board of Game:

I vote no to killing wolves from planes.

**Michael Banks
619 Green Bay Rd.
Wilmette, IL 60091**



35, 36 oppose

Have you all been listening too much to Sarah Palin, whose motto is "Reload"! and believes any kind of hunting is a nifty sport.

I oppose BOG proposals 35 and 36, which would implement aerial wolf control in Game Management Units 15A and 15C, It's unconscionable to destroy animals in this way--or any way!

I urge you to develop a more humane way of dealing with wolves. How about a nature reserve?

Anne Christian



To Board of Game

I am opposing proposals for aerial shooting of wolves for the same reasons that the Alaskan Wildlife Alliance opposes the planned actions you recommend.

HOWEVER, there is another much more personal reason for me. I have been to Alaska twice and have included a trip to the Kenai Peninsula. There is absolutely no sense in killing wolves in order to hope that hunters will have more moose. Remember, I am a California resident and bring tourist dollars (mine and millions of other "stateside" funds) to you. So shoot the wolves and you are going to give up many dollars that come to the state. Even if a tourist does not get to see a wolf - - and I consider myself fortunate to have spotted one - - to know they are there and are PROTECTED is why someone will come back. I don't think many tourists come just to see a moose; wolves are a STRONGER draw.

Aerial shooting of wolves is inhumane. The possibility for errors is large. Maiming an animal and leaving it to run off and die is cruelty. Do you, as wildlife "managers" and supporters, have a right to legislate for any activities by anyone (amateurs included) which will bring a measure of suffering to the very species you are assigned to protect?

Please examine your own conscience and leave the wolves alone to live their own natural lives.

Do not pass this legislation.

Thank you.

Dorothy McCorkle, 4610 Bristlecone Ct. Oceanside, CA 92056



To Whom It May Concern,

I am strongly *opposed* to BOG proposals 35 and 36.

I believe that there is no scientific need to implement aerial wolf control in Game Management Units 15A and 15C. Wolves are an important part of the ecosystem. When we remove these predators from the environment, we disturb the natural balance of nature that has existed for thousands of years. Wolves are also intelligent and attractive animals that fascinate people around the world. Living wolves can be a source of revenue as tourists would pay lots of money for the chance to see them in natural wilderness settings.

Sincerely,

Greg Goodmacher



To the Board of Game re Proposals 35 and 36

I strongly **oppose** these two proposals submitted by ADF&G as "placeholders" for an intensive management plan that was not ready to be included in the Proposal Book. The Proposals state that the Plan will be presented at the Barrow meeting, a remote place that few members of the public can afford the time and cost to attend.

In addition, the local Fish and Game Advisory Committees will not have had a reasonable opportunity to read and discuss the Plan and submit comments. I do not think that publication of the Plan on a webpage a few days before the meeting is appropriate. I think a vote on the Plan by the Board of Game should be delayed until it has been printed in a future Proposal Book available to everyone to read and comment on.

As a long-time Alaska resident, I have followed the wolf management issue for many years. I am deeply concerned by the continued increase of aerial wolf control over the past few years in ever more numerous areas of the state. It is now well documented that in order to be effective wolf control must be drastic and practiced year after year indefinitely. I prefer other alternatives and I would like to see aerial wolf control completely abolished as a method of predator control.

Katharine Richardson
Fairbanks, AK 99709



October 27, 2011

Re: Oppose BOG Proposals 35 & 36

To: Alaska Board of Game

I strongly oppose the Board of Game's Proposals 35 and 36. I spend a lot of time recreating on the Kenai Peninsula and value the wilderness and wildlife of the area. In my 25 years in Alaska, I was lucky enough one time to see a couple of wolves on the Kenai. It is one of the top wildlife viewing encounters that I have had. I treasure that memory and hope that others can have the same experience.

The BOG's proposals to kill these wolves will also kill any further chance for myself and other people to have the same treasured memory as I have.

The Kenai Peninsula has heavy recreational use and the BOG's proposals will conflict with that use. Hunting of wolves will make the area less safe for other users. The money spent on the wolf-killing program should be put toward more popular activities on the Kenai.

I strongly request that you reevaluate Proposals 35 and 36 and protect the incredible wolves of the Kenai Peninsula.

Karen Walker
1640 Eastridge Drive
Anchorage, AK 99501



To the Board of Game:

I strongly **oppose** BOG proposals 35 and 36 which would implement aerial wolf control in Game Management Units 15A and 15C, which include much of the western and southern areas of the Kenai Peninsula.

According to Alaska's Department of Fish & Game's own evidence presented to the BOG in March, wolf predation was not the cause of declining moose populations on the Kenai Peninsula. Rather, in 15A, the ADF&G's own data concluded that poor habitat is responsible for fewer moose. So why target wolves?

Aerial wolf killing is not only inhumane, it is also totally inappropriate in an area that is heavily populated and is a year-round recreation destination.

Since inadequate time has been allowed for public input, I urge the BOC to postpone action on the proposals until its January meeting in Anchorage, when residents directly affected by the measures would have a fair opportunity to have their voices heard.

In light of the fact that there is no real reason for indiscriminate killing of wolves, I urge the BOC to vote against these proposals.

Thank you for your consideration of my concerns.

Sincerely,
Joan Beldin



Board of Game:

I am writing to ask that you oppose BOG proposals 35 and 36. Wolves are not the problem, and this information was shared with the BOG in March. Why are they being targeted?

I will personally boycott Alaska and urge everyone I know (and don't know via Faceook and other forms of communication) until the killing of wolves in Alaska is stopped.

Diane Angelino



To: Board of Game
Oppose 35 / 36

Wolves are not the problem. The Alaska Department of Fish & Game's own evidence presented to the BOG in March concluded that predation was not the cause of declining moose populations on the Kenai. So why target wolves?

In 15A, the ADF&G's own data concluded that poor habitat is responsible for fewer moose. So why target wolves?

In addition, much of Unit 15A is within the Kenai National Wildlife Refuge, federally managed land that is off-limits to Alaska's predator control programs. Targeting wolves in the remaining area would be inefficient and at best unlikely to affect moose populations.

In Unit 15C, according to the ADF&G's own analysis, moose populations are not declining. A cited low bull-to-cow ratio cannot be traced to wolf predation, and killing wolves does not negate hunters' prior overharvest of bull moose.

Aerial wolf killing will be highly visible, controversial, and is not an appropriate action in an area that is heavily populated and a year-round recreation destination.

In both units aerial predator control is simply not practical. Forested terrain makes tracking and shooting the wolves difficult. Landing a plane, in order to salvage a carcass or dispatch a wounded animal, is problematic and dangerous.

Any private citizen with a permit not trained ADF&G biologists - will be allowed to shoot wolves from aircraft.

Public input on the proposals will be severely limited. The BOG directed ADF&G to formulate aerial wolf control plans at its March 2011 meeting, but the plans were only very recently published for public review. Further inhibiting public participation, the proposals will be discussed and voted on at the BOG's meeting in Barrow, one of Alaska's most remote and difficult-to-access cities. People from the Kenai and Southcentral Alaska those directly affected by the proposals will have virtually no opportunity for in-person input.

We ask that the BOG postpone action on the proposals until its January meeting in Anchorage, when residents directly affected by the measures would have a fair opportunity to have their voices heard.

Sincerely,

David B. Cannon, RPh



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

In regards to proposals 35 and 36 / OPPOSE

Dear Sir/Madame,

I am from Illinois and I do not have the luxury of having such beautiful animals surrounding me, but once in awhile I get to see a fox or a coyote cross my path. Each time I see such an animal a large smile comes across my face. Wolves have been in my life a long time. I have researched and read about them during my free time, at least what is left of it. They are so incredibly majestic and in so many ways, just like we are. I could never understand the want to kill such a beautiful animal. An animal which has given humans so much, including mans best friend.

I understand that they are a predator, on the other hand, we are more of a predator than they could ever be. Why should we punish an animal for wanting to survive, just because we enjoy killing animals ourselves? Once in awhile there are stories about how wolves killed dogs, or how a child was hurt or scared by a wolf. I hear those stories and I always ask, why did you leave you child or your dog alone in an area where there are wolves? Would you leave you child or car or dog in an area of a city that is prone to having drive by shootings? I certainly hope not! When there are threats we need to take precautions so that those threats all but diminish. When someone gets hurt in a bad area, we don't go to their home open their door and shoot them all, so why would we do it to an animal?

Please don't go off in a helicopter or a plane and shoot innocent animals. It is sick and unfair! The thought that people think that this is a way to hunt is disturbing. Is it really that enjoyable to take the life of another creature and destroy the family of that creature? Would you want someone to do that to your family?

Wolves may not be humans, but they are part of this world and have just as many rights to live on the land as we do. Please reconsider proposals 35 and 36.

Sincerely,
Brittanny Norton
Evanston, IL



Board of game

It is despicable that wolves are being blamed for the limited number of moose available to hunters. Stop all wolf killing.

Charmi Weker



TO: Board of Game

Oppose 35/36

I am strongly opposed to aerial wolf killing proposals 35 and 36 on the Kenai Peninsula. Aerial predator control is unacceptable in areas used for recreation by Alaskans and visitors to the state.

Sincerely, Christopher and Virginia Jones



To whom it may concern:

I am writing to **oppose Proposals 35 and 36**, the measures that would allow aerial wolf hunting in the Kenai Peninsula.

Having lived in that area several years ago, I feel the natural environment is an integral part of this world. Wolves are an essential element in maintaining a healthy eco-system, study after study has proven this.

Your own data has revealed that the moose population is reduced due to habitat, therefore, further decimation of the wolf population will not improve the number of moose. The fact that anyone can get in a plane and hunt wolves is obviously unsafe. I recall that there were many small plane accidents in Alaska, and there stands to be many more in the forested lands of the Kenai Peninsula.

Please take a stand in moving forward and making intelligent decisions regarding wildlife management. Review the recent study done in Yellowstone that proves wolves play an essential role in maintaining a thriving environment.

Thank you,

Rebecca Elgin
Ashland, Oregon



Oppose 35 & 36

I oppose the aerial gunning of ANY predator for any purpose and especially to enhance hunting opportunities. It is NOT management & does not benefit the whole.

Karen Hackey
Las Cruces, NM

--

"The most common trait of all primitive peoples is a reverence for the life-giving earth, and the Native American shared this elemental ethic: The land was alive to his loving touch, and he, its son, was brother to all creatures."
~Stewart Udall~



I **oppose** Alaska Board of Game proposals 35 & 36 which would start aerial wolf control efforts in game management areas 15a and 15c. Unit 15a lies within Kenai National Wildlife Refuge--a federal conservation area is supposed to *prohibit* state predator control activities.

Tourists will be shocked to see wolves being killed in this manner. These proposals sure won't help Alaska tourism.

Thank you for reviewing my concerns.

Linda Wagner
Nashville, TN



Oppose 35 & 36

Ladies and Gentlemen of the Alaska Board of Game -

Do you or do you not operate on sound science, research and evidence?

The evidence is already in: predation is not the cause of declining moose populations on the Kenai.

How can you ignore the facts and evidence in Units 15A and 15C?
Poor habitat and over-harvesting are the culprits, not wolves.

It is imperative that you postpone action on the proposals until your January meeting in Anchorage.

This will give residents directly affected by the measures a fair opportunity to have their voices heard.

Biff Ewers



Sirs:

I definitely OPPOSE proposals 35 and 36, re: airborne hunting of the wolves.

Per the information which is in your e-mail, the airborne hunts would include much of the Western and Southern areas of the Kenai Peninsula. These actions are cruel and unnecessary!!!! To eliminate the essential wolf, just to, supposedly, increase other animal populations... then to hunt them!!!! ABSURD!!!!

God Bless.

Jane Heltebrake



We are writing to say that we unequivocally **oppose** Board of Game proposals 35 and 36.

The effort to exterminate wolves just seems to go on and on. These two proposals make absolutely no sense when Fish and Game's own analysis indicates that wolves were NOT the cause of a decline in the moose population of the targeted areas, and in fact there may not even be a decline in the moose population there.

Furthermore, a substantial portion of unit 15A falls within the Kenai national Wildlife Refuge, which is NOT subject to state predator controls. This area is heavily used and having individuals flying around in planes target shooting at wolves in this populated area is neither safe nor practical.

Lastly, the negative publicity such short-sighted and destructive proposals will generate if implemented will certainly impact on Alaska's tourist and ecotourism industry.

Please reconsider these proposals.

Thank you.

Jim and Joy Ames
P.O. Box 487
Oregon House, CA 95962



To: BOG

Oppose 35, 36

Wolves are not the problem. The Alaska Department of Fish & Game's own evidence presented to the BOG in March concluded that predation was not the cause of declining moose populations on the Kenai. So why target wolves?

In 15A, the ADF&G's own data concluded that poor habitat is responsible for fewer moose. So why target wolves?

In addition, much of Unit 15A is within the Kenai National Wildlife Refuge, federally managed land that is off-limits to Alaska's predator control programs. Targeting wolves in the remaining area would be inefficient and at best unlikely to affect moose populations.

In Unit 15C, according to the ADF&G's own analysis, moose populations are not declining. A cited low bull-to-cow ratio cannot be traced to wolf predation, and killing wolves does not negate hunters' prior overharvest of bull moose.

Sincerely,

Cherish.Bahr



To the Board of Game:

OPPOSE 35, 36

The five members of the Casey family of Eagle River, Alaska strongly oppose the aerial hunting of wolves on the Kenai Peninsula.

I realize you members are part of an echo chamber that never hears opposition from your meetings and I also realize you represent the "industrial" aspect of hunting by guides and Boone and Crocket trophy hunters.

The science behind predator control is specious at best and I have serious concerns over the viability of the aerial program. I have talked to many scientists over how this program even came into existence.

Do you take into account any historical data? How far Back? Train and auto harvest? Legal and illegal hunting? Development of new housing? Forest and browse habitat? Have not predators and prey co-existed without problems PRIOR to aerial wolf hunting?

I am a NRA member and active hunter who actively seeks permits and hunts every year. I remember the days when "fair chase" meant something. I also strongly oppose this bullshit "solution" to "increase" moose.

Here is a novel idea. Stop hunting for a few years, lobby to restrict subsistence with the feds, and represent ALL Alaskans instead of the cozy little maximum harvest at any cost lobby.

Thank you for your time. You did talk to Vic Van Ballenberghe, you know, a REAL moose expert. Interesting he did not get confirmed to the Board of Game.

Sincerely,

Larry Casey & Family
12428 Winter Park Circle
Eagle River, AK 99577



My comments on AK Wolf Killing OPPOSE 35 and 36

Dear BOG:

I am a former resident and worker of Alaska, writing to express my disapproval of intended plans to expand your aerial hunting program on the Kenai Peninsula. Not only is the plan inhumane, it is unsustainable and does not properly address or rectify any (supposed) disproportion in predator-prey population dynamics. I studied conservation biology as a post-graduate, where my research focus was wolf ecology and management in the United States. I am familiar with the study by the National Academies of Science's National Research Council of the impact of wolves and wolf control programs on prey populations in Alaska, which I read in its entirety. The NRC concluded after a comprehensive study that wolf control programs were biologically unsound. I am also aware that the BOG and the Alaska Department of Fish & Game have conducted very few censuses to accurately determine wolf: moose ratios. This seems like nothing more than another attempt to "harvest" moose populations for out of state game and sports hunters and raise state revenues.

I would ask that you choose science over money in this case and please not extend the grisly and unnecessary aerial control program to the Kenai Peninsula. Thank you for your consideration.

Sincerely,

Laura Kiesel
M.Sc. Natural Resources and Environmental Policy



Louise Kane
18 Beach Plum Lane
Eastham, MA 02642

RE: OPPOSE aerial wolf killing, or any wolf killing

To whom it may concern.

There are too many ways that a proposal to hunt wolves with airplanes is wrong to enumerate... but prime among them are that wolves are not the problem with declining moose populations! This is clearly outlined within your own department. Some other problems with this idea are as follows and these have been outlined by people who work on this issue. In 15A, the ADF&G's own data concluded that poor habitat is responsible for fewer moose. So why target wolves? In Unit 15C, according to the ADF&G's own analysis, moose populations are not declining. A cited low bull-to-cow ratio cannot be traced to wolf predation, and killing wolves does not negate hunters' prior overharvest of bull moose. Any private citizen with a permit – not trained ADF&G biologists - will be allowed to shoot wolves from aircraft. Aerial wolf killing will be highly visible, controversial, and is not an appropriate action in an area that is heavily populated and a year-round recreation destination.

Above and beyond all of the previous reasons not to kill wolves, is wolves contribute to a healthy ecosystem and biodiversity. Furthermore, wolves are a national treasure and many many people like myself come to visit Alaska to see wildlife not to hear gunshots that are killing wolves and other wildlife. We live in a society where our wildlife is being pushed to the outer limits and there is no where for them to live safely, Aerial hunting is a disgusting practice that should be outlawed. Wolves are highly intelligent animals with a social pack structure that is in place and all wolves play a part in the pack's survival. Indiscriminate killing of wolves undermines the pack's ability to function and live.

What a seriously flawed and morally inappropriate thing to consider, killing wolves that is. I will personally stop visiting Alaska if your aerial hunting goes into effect. I am a producer of documentaries and I am working on programming to showcase how wolves have been targeted by special interest groups like ranchers and hunters and how they were taken off the ESA via a sleazy rider that was attached to the spending bill in contravention of most American's wishes, and against the courts and the intent of Congress in implementing the ESA. I hope when I pitch this programming that I will not also be focusing on Alaska and any aerial hunting of wolves there. Its a shameful, outdated and horrible practice. It's time to start protecting predators instead of harassing and killing them indiscriminately to satisfy irrational unfounded fears. Alaska is our national wilderness treasure and so are its wolves, do something right and protect your wildlife and the majestic wolves.

Sincerely,
Louise Kane, JD



OPPOSE 35 and 36

I have vacationed in Homer on the Kenai Peninsula many times and it breaks my heart that aerial wolf killing is even being considered in this beautiful pristine area. The inhumanity of the killing will hang in the environment, spoiling it for visitors and tourists forever. Please don't do this.

Florence Stasch



I am submitting my opposition to Prop 35 & 36 in protection of the wolves.

Thank you,
Katarina Flynn



I'm writing to oppose proposals 35 and 36 which would implement ariel wolf control. The problem isn't wolves. In March, the Alaska Dept. of Fish and Game presented their own evidence that wolf predation was not causing the decline of moose populations on the Kenai. The ADF&G's own data in 15A concluded that the decline is due to poor habitat. Importantly, much of Unit 15A is within the Kenai National Wildlife Refuge which is federally managed land and therefore off limits to Alaska's predator programs. According to the ADF&G's own analysis, the moose populations in Unit 15C aren't declining. The killing of wolves doesn't negate the hunters' overharvesting of bull moose.

The ariel killing of wolves is not only very visible and controversial, it's also not an appropriate action in an area that is both used recreationally and is heavily populated. Any citizen with a permit will be allowed to shoot wolves from aircraft - it will not be trained ADF&G biologists.

It is impractical to use ariel predator control in both units. Tracking and shooting wolves is difficult in the forested terrain, and trying to land a plane to salvage a carcass or kill a wounded animal is dangerous.

Lastly, there are severe limitations on public input of the proposals. ADF&G was directed by BOG at its March 2011 meeting to formulate ariel wolf control plans, but the plans were only very recently published for public review. The proposals will be discussed and voted on at the BOG's meeting being held in Barrow which is very remote and difficult to access, and this will further inhibit and limit public participation. The people from Southcentral Alaska and the Kenai, who are directly affected by the proposals, will have literally no opportunity for input in person.

I'm writing to ask that the BOG postpone action on the proposals until its January meeting in Anchorage, when the residents who will be directly affected by the measures would have a fair opportunity to have their voices heard.

Sincerely,

Mary Rothschild



Dear Board of Game,

I am concerned that you are considering aerial wolf killing in a populated area.

Sincerely,
Corinne Conlon
1677 Harbor Way
Juneau, AK 99801



I oppose BOG proposals 35 and 36 that would implement aerial wolf control in Game Management Units 15A and 15C, which include much of the western and southern areas of the Kenai Peninsula.

Aerial wolf killing is not an appropriate action in an area that is heavily populated and a year-round recreation destination. I also want you to know I will never visit Alaska because of BOG's complete disregard for wildlife.

**Thanks,
Gary**

**Gary Voeste
Director of Pharmacy
Moab Regional Hospital
450 W. Williams Way
Moab, UT 84532**



Please deliver my email comments to the BOG.

10-26-11

35 & 36 OPPOSE

To Whom It May Concern,

As as Alaskan I am horrified by the attack on wolves. Time and again the Board of Game proves itself to be completely disconnected with the majority of Alaskans who don't hunt. The majority of Alaskans who shop at Costco.

This type of barbaric behavior is shameful and among my friends I am embarrassed to identify myself as an Alaskan. Strange that a state that prides itself on wildlife tourism spends so much time, money and resources killing it.

Most of 15a's unit is managed by the Federal government, so why is the state working so hard to target wolves in that region? Aerial wolf killing is inappropriate in a recreation area, in addition to being morally wrong.

Aerial predator control in general is high cost, not efficient as well as a horrible act.

At the very least the BOG should postpone action so those citizens affected by this proposal can have time to participate in the discussion. After all, last time I checked we still live in a democracy.

**Sincerely,
Jennifer Meyer
1850 Greendale Drive
Anchorage AK 99504**



35 and 36 OPPOSE

Removing wolves, the apex predator, can only harm the very eco systems that you are sworn to protect. Predators keep the wildlife population healthy and keep prey species from over grazing and starving to death.

Every eco system into which the apex predator has been returned has seen an increase in the vibrancy of life. Please listen to scientists instead of politicians.

Aerial killing or herding of wildlife is horrible, costly, and demented. There is no scientific basis for removing wolves from the Kenai Peninsula, or from any system that is to be managed sustainably.

Thank you,

Ty Beh



Oppose 35 and 36

I am very opposed to aerial wolf killing in any place in Alaska, including the Kenai. I have been a resident of the state for almost 30 years. The artificial control of one species to favor a specific group of hunters will continue to showcase Alaska as a state with backward and ignorant wildlife policies. Thank you for considering the negative aspects of such an opinion.

Jan St. Peters
PO Box 323
Healy, Ak. 99743



Please consider my comments:

Please consider the below and defeat BOG proposals 35 and 36!

- **Wolves are not the problem.** The Alaska Department of Fish & Game's own evidence presented to the BOG in March concluded that predation was not the cause of declining moose populations on the Kenai. So why target wolves?

In 15A, the ADF&G's own data concluded that poor habitat is responsible for fewer moose. So why target wolves?

In addition, much of Unit 15A is within the Kenai National Wildlife Refuge, federally managed land that is off-limits to Alaska's predator control programs. Targeting wolves in the remaining area would be inefficient and at best unlikely to affect moose populations.

In Unit 15C, according to the ADF&G's own analysis, moose populations are not declining. A cited low bull-to-cow ratio cannot be traced to wolf predation, and killing wolves does not negate hunters' prior overharvest of bull moose.

- **Aerial wolf killing will be highly visible, controversial, and is not an appropriate action** in an area that is heavily populated and a year-round recreation destination.
- **In both units aerial predator control is simply not practical.** Forested terrain makes tracking and shooting the wolves difficult. Landing a plane, in order to salvage a carcass or dispatch a wounded animal, is problematic and dangerous.
- **Any private citizen with a permit – not trained ADF&G biologists - will be allowed to shoot wolves from aircraft.**
- **Public input on the proposals will be severely limited.** The BOG directed ADF&G to formulate aerial wolf control plans at its March 2011 meeting, but the plans were only very recently published for public review. Further inhibiting public participation, the proposals will be discussed and voted on at the BOG's meeting in Barrow, one of Alaska's most remote and difficult-to-access cities. People from the Kenai and Southcentral Alaska – those directly affected by the proposals – will have virtually no opportunity for in-person input.

We ask that the BOG to postpone action on the proposals until its January meeting in Anchorage, when residents directly affected by the measures would have a fair opportunity to have their voices heard.

Sincerely,
Lee Ann Stiff



To: Board of Game

Please consider this email when you consider Bog Proposals
No. 35 and 36. (oppose)

I spend a lot of time in Alaska photographing.

I do not believe the wolf population is out of control.
Nor do believe the wolf population is the cause for the
moose decline. Even The Alaska Department of Fish & Game's
own evidence presented to you last March concluded that
predation was not the cause of declining moose populations
on the Kenai. Please don't ignore this evidence.

Furthermore, a majority of Alaskans do not agree with
aerial killing of wolves.

Also, Unit 15A is already within the National Wildlife
Refuge. How can you even consider including this. You have
no jurisdiction.

In addition, consider the fact that the reason the moose
heard is declining is because the bull moose have been over
hunted. This was even supported by The Alaska Department
of Fish & Game.

I respectfully ask that you oppose these proposals.

Thank you.

Bob

Robert A. Watson
25945 New Rd.
North Liberty, IN 46554



Oppose Proposals 35 and 36

These recurring programs of aerial wolf control continue to give Alaska a bad name around the nation. Is that what Alaskans want?

Ken Ross 10/27/2011



Proposal 35 7 36

I live on the Kenai Pen, I hunt, and I see no reason to shoot wolves from the air. In fact I see no wolf problem at all. No sure where the BOG is getting their info.

Pat



Dear Members of the Alaska Board of Game:

In Opposition to BOG proposals 35 and 36:

As has been declared at the BOG last March, the ADF&G's own evidence presented concluded that predation was not the cause of declining moose populations on the Kenai. So why target wolves?

In Unit 15A, the ADF&G's own data concluded that poor habitat is responsible for fewer moose.

In addition, much of Unit 15A is within the Kenai National Wildlife Refuge, federally managed land that is off-limits to Alaska's predator control programs. Targeting wolves in the remaining area would be inefficient and at best unlikely to affect moose populations.

In Unit 15C, according to the ADF&G's own analysis, moose populations are not declining. A cited low bull-to-cow ratio cannot be traced to wolf predation, and killing wolves does not correct hunters' prior overharvest of bull moose.

Aerial wolf killing will be highly visible, controversial, and is not an appropriate action in an area that is heavily populated and a year-round recreation destination.

Additionally, in both units aerial predator control is simply not practical. Forested terrain makes tracking and shooting the wolves difficult. Landing a plane, in order to salvage a carcass or dispatch a wounded animal, is problematic and dangerous. Furthermore, any private citizen with a permit – not trained ADF&G biologists – will be allowed to shoot wolves from aircraft thereby increasing the risk of accidents.

The BOG directed ADF&G to formulate aerial wolf control plans at its March 2011 meeting, but the plans were only very recently published for public review, thereby limiting public input. Further inhibiting public participation, the proposals will be discussed and voted on at the BOG's meeting in Barrow, one of Alaska's most remote and difficult-to-access cities. People from the Kenai and Southcentral Alaska – those directly affected by the proposals – will have virtually no opportunity for in-person testimony.

We ask that the BOG postpone action on the proposals until its January meeting in Anchorage, when residents directly affected by the measures would have a fair opportunity for in-person testimony.

Thanks for the opportunity to comment.

Jeff Sloss, 740 5th St., Juneau, AK 99801



Bonny L. Schumaker, Ph.D.

626.798.8398 (office) 626.383.1412 (mobile & text)

P.O. Box 583 La Canada, CA 91012-0583 USA

To the Alaska Department of Fish & Game:

I can imagine that you might find comments from people who live a couple of thousand miles south of you irrelevant and ill-informed, but know that we keep ourselves quite informed, and we have studied effects of similar wildlife "management" plans in the lower 48 over the past several decades and more. We cannot see good reasons for this cruel culling of wolves. We do not see proof that left to themselves, there won't come a balance between wolf and moose populations. And we see no valid reason for trying to manipulate moose numbers in order to provide more for human hunters because human hunters don't want to compete with wolves. Further, you are planning to perform this aerial shooting in an area prized for recreation and beauty. Give us better research and reasons, or call off your guns, please.

Bonny L. Schumaker, Ph.D.

**President and Founder, *On Wings Of Care, Inc.*
California non-profit 501(c)(3) dedicated to Saving Lives and Habitat**

--



Good afternoon. I am opposed to BOG Proposals 35 and 36 which would implement Aerial Hunts in Units 15A and 15C. This method used to kill wolves is not humane and often leaves the animals wounded and to die a slow death. There is also the aspect that wolves are being blamed for what was more than likely over hunting of moose over the past years.

Please know that the killing of a wolf does not sit lightly with many people and that people through out the United States and Canada are watching your every move. How many wolves are going to die before people realize that they are not the problem??? Please do the right thing and do not allow these proposals to happen. Once again, we will be watching. Thanks and take care.

Dan Larivey
Boyce, VA



RE: BOG proposals 35 and 36. **I OPPOSE both of these proposals.** The chief control of moose populations is poor habitat, not predation, as noted by ADFG.

It is terribly poor practice to allow any private citizen, permitted or not, to shoot animals from aircraft. This opens the door to wanton destruction, often by shooters that just enjoy killing. There is little reason to believe that this would accomplish anything but a bunch of dead/wounded wolves but with no effect on the moose population.

It is totally unfair to hold the vote on these proposals so far away from the area that would be affected, so people on the Kenai don't have the opportunity for in-person comment.

These proposals don't help the moose hunters, they would just legalize slaughter of wildlife.

It would be better, and more effective, to stop moose hunting in those areas for a few years, to allow the population to stabilize, have a balanced sex ratio, and fill whatever habitat is available. If the habitat is poor, one cannot expect lots of moose, no matter how many predators are killed. Killing wolves just further destabilizes the situation. Mother Nature is better at managing wildlife than humans are: when we fiddle with the populations, everything starts to get out of whack.

Mary F. Willson
Juneau, Alaska



I oppose proposals 35, 36

This must stop and cannot be condoned.

Leslie G Baker



To: Alaska Board of Game

OPPOSE Proposals 35 and 36

As we are sure you know, the Alaska Department of Fish & Game's own evidence presented to the BOG in March concluded that predation was not the cause of declining moose populations on the Kenai. The ADF&G concluded that poor habitat is responsible for fewer moose. Killing wolves simply to increase game is NOT in the best interest of anyone except short-sighted greedy white trash who have no sense of public responsibility whatever. We don't need that kind making these decisions.

You must also be aware that a large part of Unit 15A is within the Kenai National Wildlife Refuge, federally managed land that is off-limits to Alaska's predator control programs. Targeting wolves in the remaining area would be unlikely to affect moose populations.

In Unit 15C, according to the ADF&G's own analysis, moose populations are not declining. A cited low bull-to-cow ratio cannot be traced to wolf predation, and killing wolves does not negate hunters' prior overharvest of bull moose. Hunters and not wolves need to be controlled.

Allowing private citizens to shoot wolves from an aircraft leads directly to over-killing, no oversight of activities, and killing outside legal areas. It is your duty NOT to allow behavior that you cannot monitor and supervise.

The BOG directed ADF&G to formulate aerial wolf control plans at its March 2011 meeting, but the plans were only very recently published for public review. Further inhibiting public participation, the proposals will be discussed and voted on at the BOG's meeting in Barrow, one of Alaska's most remote and difficult-to-access cities. People from the Kenai and Southcentral Alaska - those directly affected by the proposals - will have virtually no opportunity for in-person input.

We ask that the BOG to postpone action on the proposals until its January meeting in Anchorage, when residents directly affected by the measures would have a fair opportunity to have their voices heard.

It sound like a small number of white trash are running the BOG and trying to exclude ordinary citizens from the democratic process. Clean up your act, guys.

Dr. Michael Huesemann
Dr. Joyce Huesemann



To: Board of Game

I OPPOSE Proposals 35 and 36

Please stop this insanity. Soon we'll have no more wildlife for visitors to see.

I have been here 25 years - and it is amazing how little wildlife I see anymore.

Sue Forbes
1861 falcon circle
Anchorage, AK
99504

