

Public Comment Index
Alaska Board of Game
Statewide 2012

PC01	Angela Vanecken	PC44	Vic Van Ballenberghe
PC02	Tristan Sophia	PC45	Kris Wheaton
PC03	Helen Caswell	PC46	Bill Sherwonit
PC04	Gabrielle Karras	PC47	Cindy Birkhimer
PC05	Phyllis Cordero	PC48	Defenders of Wildlife
PC06	John Dunn	PC49	Beverly Clauss
PC07	Barbara Lynn Voss	PC50	F. Wittwer
PC08	Rhett Lawrence	PC51	Toby Smith
PC09	Paul Tomlinson	PC52	Alaska Bowhunters Association
PC10	Stephan Sidham	PC53	Susan Wise-Eagle
PC11	Marianne White	PC54	U.S.F.W.S.
PC12	Elizabeth Borges	PC55	Big Game Commercial Services Board
PC13	Renee Eder	PC56	Mark Gordon
PC14	Timonth Mathlason	PC57	Representative Tammie Wilson
PC15	Sherry Bottons	PC58	Peter Holck
PC16	Albert Barnart	PC59	Aaron Pearsall
PC17	Eugene Kiver	PC60	Steve Klaich
PC18	Dee Hudson	PC61	Charles Kahahawai
PC19	Beth Nelson	PC62	Meg Mitchell
PC20	Felicity Devlin	PC63	Tim Sell
PC21	Judith Stauffer	PC64	Alaska Outdoor Council
PC22	Marcus Lanskey	PC65	Robert and Linda Shaw
PC23	Denee Scribner	PC66	Dennis Bishop
PC24	Renee Denartin	PC67	David Hampton
PC25	Lorinda Roland	PC68	Lars Sego
PC26	Richard Anderson	PC69	Keri Stout
PC27	Lisette Root	PC70	Patricia Rodriguez
PC28	Gail Richardson	PC71	David Frank
PC29	Randall Gloege	PC72	Richard Hoyer
PC30	Dori Denarbiex	PC73	Jim Herbert
PC31	Nels Kalstron	PC74	James Nelson
PC32	H. McFadden	PC75	Doug Lenier
PC33	Clenna Simmons	PC76	Rhonda Lanier
PC34	James Boone	PC77	Gypsy Vanner
PC35	Elizabeth Bloom	PC78	Olga von Ziegesar-Matkin
PC36	John Moolley	PC79	Chugach State Park Citizens' Advisory Board
PC37	Don Humley	PC80	R. Sabin
PC38	Dale Hall	PC81	Joe Letarte
PC39	Dan Marshall	PC82	Alaska Trappers Association
PC40	Perry Schneider	PC83	Wild Sheep Foundation
PC41	Tad Fujioka	PC84	Lee R. Grater
PC42	Con Bunde	PC85	Kawerak Inc.
PC43	Robin Collman		

Public Comment Index
Alaska Board of Game
Statewide 2012

PC86	Alaska Falconers Association	PC127	Kathy East
PC87	Gary Hampton	PC128	Alaska Professional Hunters Association
PC88	Robert Standish	PC129	Sam Roher
PC89	Jack Atcheson Jr.	PC130	Joe Klutsch
PC90	American Association of International Professional Hunting and Fishing Consultants	PC131	David Scheidt
PC91	Yolanda de la Cruz	PC132	Burt Bomhoff
PC92	Virgil Umphenour	PC133	Gus Lamoureux
PC93	Alex Kime	PC134	Roy & Charlene Huhndorf
PC94	Gretchen Kime	PC135	Science Now Project
PC95	Audubon Alaska	PC136	AHTNA
PC96	National Parks Conservation Association	PC137	Western Interior Alaska Subsistence Regional Advisory Council
PC97	Michael Strahan	PC138	U.S. Fish and Wildlife Service
PC98	Kneeland Taylor	PC139	Linda Feiler
PC99	The Wildlife Society	PC140	Keri Stout plus 170 signatories
PC100	Richard Holmstrom	PC141	Chuck Caldwell
PC101	David Lorrington	PC142	Tim Vlasak
PC102	Karen Cauble	PC143	Jake Sprankle
PC103	National Park Service	PC144	Jenny Pursell
PC104	Fredrick Overly	PC145	Brian Okonek
PC105	Leonard Jewkes	PC146	Department of Transportation
PC106	Robert Collins	PC147	Patricia Cue
PC107	George Matz	PC148	Lisa Climo
PC108	Tina Brown	PC149	Rika Mouw
PC109	David Bachrach	PC150	Mark Richards
PC110	Resurrection Bay Conservation Alliance	PC151	Terry Marquette
PC111	Don Hunley	PC152	Ronald Clarke
PC112	Marilyn Hauser	PC153	Mike Crawford
PC113	Wayne Hall	PC154	Kim Busch
PC114	Eric Fontaine	PC155	Patricia O'Brien
PC115	Richard Flanders	PC156	Patricia O'Brien-combine
PC116	Colleen Peterson	PC157	Timothy Sell
PC117	Kachemak Bay Conservation Society	PC158	Valesa Linnean
PC118	Roberta Highland	PC159	John Eiler
PC119	Brian Hewitt	PC160	Brian Blossom
PC120	Marty Laudert	PC161	Lin G. Davis
PC121	Tom Lamal	PC162	Maureen P. Longworth
PC122	Kurt Schmidt	PC163	Roy and Charlene Huhndorf
PC123	Gary Holmstead	PC164	Backcountry Hunters and Anglers
PC124	Dan Montgomery	PC165	Alaska Wildlife Alliance
PC125	Shoshana Sadow	PC166	Joe Zapotosky
PC126	Loren Karro	PC167	Al Barrette
		PC168	Trout Unlimited

Public Comment Index
Alaska Board of Game
Statewide 2012

PC169	Larry Dalrymple	PC212	Kat Malstead
PC170	Pat Bock	PC213	Dr. Maria Proietti
PC171	Maria Proietti	PC214	Anita Chittenden
PC172	Sandra Meyerhoff	PC215	Carla Porter
PC173	Karen Dettmann	PC216	Cynthia Heiden
PC174	Bill Zager	PC217	Marianne Widmalm
PC175	Terry Traveland	PC218	Javier Rivera
PC176	Beth Davidow	PC219	Brian Armer
PC177	Kaleen Vaden	PC220	Scott Chesney
PC178	Daniel Gross	PC221	Mariana Aprile Bittencourt
PC179	Mary Traveland	PC222	Kimberly Kellar
PC180	Linda Saunders	PC223	Joost Ligthart
PC181	Adam Markey	PC224	Rachelle Parks
PC182	Johanna Bakker	PC225	Tina Siragusa
PC183	Cathy Leonard	PC226	Jeff Love
PC184	Cherish Bahr	PC227	Christa Niederreither
PC185	Dr. I. de Baintner	PC228	Susan Bond
PC186	Eva Saulitis	PC229	Geneva Craig
PC187	Craig Matkin	PC230	Ty Beh
PC188	Susan Meyer	PC231	Frances Martin
PC189	Carol Griswold	PC232	Michael Banks
PC190	L. Garvey	PC233	Doug Tielbur
PC191	Steven Hallenbeck	PC234	Kim Ogden-Avrutik
PC192	Erica Hallenbeck	PC235	Ed Blood
PC193	Brad Long Josephs	PC236	JS Angela
PC194	Mark J.. Dinkle	PC237	Petra Bloemendal
PC195	Marc Cooke	PC238	Donna Quante
PC196	Carol Hadley	PC239	Alexander Reed
PC197	Anita Pryor	PC240	Dr. Kendra Ehlich Elliot
PC198	Linda Wagner	PC241	Honey Elovitz
PC199	Stan Lanier	PC242	Nancy Kaminski
PC200	Gerald Brookman	PC243	Margaret Macy
PC201	Nicholas Genera	PC244	Dave Hornoff
PC202	Jacqueline Keegan	PC245	Steve Clevidence
PC203	Virgina Jones	PC246	Robin Stafford
PC204	Mark Balitzer	PC247	Annmarie Maag
PC205	Carly Schmid	PC248	Signature Missing
PC206	Aaron Cumbie	PC249	Eva Schorer
PC207	Sharon Carson	PC250	Karen Davison
PC208	Kim Bean	PC251	Leila Konijn
PC209	Lynn Driessen	PC252	Mossy Kilcher
PC210	Scarlett Cooley	PC253	Shannon Basner
PC211	Charlotte Markey	PC254	Jennifer Meyer

Public Comment Index
Alaska Board of Game
Statewide 2012

PC255 Thomas St. Laurent	PC298 Shaymaa Mahmoud
PC256 Mark and Ruth Stevens	PC299 Julie Billingsley
PC257 Jennifer Hane	PC300 Patty Fryman
PC258 Jeremy Graham	PC301 Lee Ann Stiff
PC259 Karen Uyeno	PC302 Kelley Tucker
PC260 Julie Finklestein	PC303 Spencer Lennard
PC261 Mary F. Willson	PC304 Leslie and Rowan Law
PC262 Mathew J. Zola	PC305 Belinda Barber
PC263 June E. Abner	PC306 Jessica and Turner Burns
PC264 Lyn Pollard	PC307 Catherine Lord
PC265 Sayre Family	PC308 Patricia Field
PC266 Judy Skopek	PC309 Jolee Josephs
PC267 Sandy Webb	PC310 Jed B. Zimmerman
PC268 Kenya	PC311 Pamela Edgemon
PC269 Cindi Read	PC312 Dustin G. Rhodes
PC270 Janet Hoben	PC313 Mary Jo Ghram
PC271 Patricia Schneider	PC314 Ardis Skillet
PC272 Allen Acosta	PC315 Larry Casey & Family
PC273 Carol Norton	PC316 Susan Valenti
PC274 Ron Perry	PC317 Helen Yi
PC275 Lisa Williamson	PC318 Lain Macdonald
PC276 Sarah Jay	PC319 Susan Post
PC277 Raytha Poland	PC320 Ayme Gomoluch-Sims
PC278 Heidi, Christopher and Hannah Dorr	PC321 Joseph and Carol McVeigh
PC279 Andrea Wasserman	PC322 Chris Dewey
PC280 Gary Voste	PC323 Marc and Marnie Gaede
PC281 Sharon Abramczyk	PC324 Tara Morrison
PC282 Katherine Krause B313	PC325 Mike Adams
PC283 Terry Horner	PC326 Kevin Nahler
PC284 Patrica Tallner	PC327 Maria Lazarus
PC285 Corinne Conlon	PC328 Justin Wolverton
PC286 Diane and Chuck Brandstetter	PC329 Andra Sigailis and Karlis Stolcers
PC287 Heather Whitney	PC330 Katherine Richardson
PC288 Kirsten Bilderaya	PC331 Patrice Lecso
PC289 William Weir	PC332 Frank Haviland
PC290 Kate Massey	PC333 Zucker Family
PC291 Jo-An Murphy	PC334 Laura Kiesel
PC292 Fernanda Klinger	PC335 Lisa Budz
PC293 Nikki Yrenio	PC336 Karen Silva
PC294 Jeffery Kramer	PC337 Susan Shaulis
PC295 Loretta Stadler	PC338 Linda Maslin
PC296 Dr. Michael and Dr. Joyce Huesemann	PC339 Eileen Brown
PC297 Lisa Kerry	PC340 Charmie Weker

Public Comment Index
Alaska Board of Game
Statewide 2012

PC341 Viviane Vanbuggenhout
PC342 Nikki Doyle
PC343 Bruce Faanes
PC344 Laura Cowen
PC345 Syd Low
PC346 Laura Sneddon
PC347 Brian Beckwith
PC348 Theresa Hicks
PC349 Fernando Melian
PC350 Jeanne Fedel
PC351 Keri Gardner and Robert Hodge
PC352 Jane Heltebrake
PC353 Deb Hochhalter
PC354 Ruth Rollow
PC355 Sharon Lowe
PC356 Dorothy and Leo Keeler
PC357 Jan S. Peters
PC358 Annie Kerin
PC359 Selma Saidane
PC360 Emily Neibuhr
PC361 Lyle Mayer
PC362 Patricia Vondruska
PC363 Bill Wallace
PC364 Scherel Carver
PC365 Ravi Madapati
PC366 Steve Easton
PC367 Linda Sampson
PC368 Pat Irwin
PC369 Eileen Bosch

Dec 8, 2011

Chairman Cliff Judkins

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

Dear Chairman Judkins,

Hunting should not be allowed on National Park lands at all and the use of baits, lights, and traps should not be allowed on any public land. If it so hard to find and shoot these animals then they are not a threat. There is no conscionable reason to resort to these extreme methods. It seems there is no land sacred or wildlife safe in this country if these acts can take place in OUR National parkland. I strongly encourage you to support Proposals: 48, 93, 94, 97, 108, 121, and 126.

Thank You

Sincerely,

Ms. Angela Vanecken
PO Box 186
Pacific Beach, WA 98571-0186



Dec 10, 2011

Chairman Cliff Judkins

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

Dear Chairman Judkins,

I support and urge you to support the following seven proposals which will be considered at the January 2012 meeting in Anchorage:

Proposal 48: exempt NPS lands from allowing game meat to be purchased and sold

Proposal 93: exempt NPS lands from state regulation allowing trapping with a gun

Proposal 94: exempt NPS lands from wolf trapping seasons that extend into months when pups are born

Proposal 97: exempt NPS lands from the use of artificial light (spotlighting) to kill bears in dens

Proposal 109: exempt NPS lands from killing bear cubs and sows with cubs

Proposal 121: exempt NPS lands from bear baiting or the use of scent lures

Proposal 126: exempt NPS lands from trapping of black bears

Thank you.

Sincerely,

Dr. Tristan Sophia
806 W Pennsylvania Ave
Deer Lodge, MT 59722-1342



Dec 11, 2011

Chairman Cliff Judkins

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

Dear Chairman Judkins,

It really matters that wolves and bears remain free and wild in Alaska. If that last wild state loses its animals, it is no longer different than New Jersey.

Shortsighted people think that hunting or harvesting wildlife in national parks and preserves is a proper way to manage wildlife. I disagree. Once these animals are gone, they will never return, and all the ecosystem that relies on them will crumble.

As a frequent visitor to Alaska, I urge you to be forward-thinking and protect the wildlife of Alaska.

I support and urge you to support the following seven proposals which will be considered at the January 2012 meeting in Anchorage:

Proposal 48: exempt NPS lands from allowing game meat to be purchased and sold

Proposal 93: exempt NPS lands from state regulation allowing trapping with a gun

Proposal 94: exempt NPS lands from wolf trapping seasons that extend into months when pups are born

Proposal 97: exempt NPS lands from the use of artificial light (spotlighting) to kill bears in dens

Proposal 109: exempt NPS lands from killing bear cubs and sows with cubs

Proposal 121: exempt NPS lands from bear baiting or the use of scent lures

Proposal 126: exempt NPS lands from trapping of black bears

Thank you for your time.

Sincerely,

Ms. Helen Caswell
4190 12th St SE
Salem, OR 97302-1873



Dec 9, 2011

Chairman Cliff Judkins

Alaska Board of Game, Alaska Dept. of Fish and Game, Beard Supports
Section, P.O. Box 115526
Juneau, AK 99811-5526

Dear Chairman Judkins,

I am against hunting on National Service Lands. Alaska's national parks and preserves attract visitors from around the world for opportunities including seeing wildlife such as bears and wolves. I believe that wildlife living on lands managed by the National Park Service should be exempt from certain state of Alaska hunting regulations. The Park Service is charged by Congress to protect natural and healthy wildlife populations. It is prohibited from manipulating one wildlife population for the benefit of another (i.e. increasing the harvest of wolves and bears to benefit moose and caribou). The state of Alaska, on the other hand, is charged with maximizing wildlife for human consumption. Obviously, there is a conflict between these two different ways of managing wildlife.

Over the years, the state of Alaska has adopted hunting regulations that both encourage a higher harvest of and/or make it easier to kill wolves and bears. National Park Service lands should be exempt from those regulations. I support and urge you to support the following seven proposals which will be considered at the January 2012 meeting in Anchorage:

Proposal 49: exempt NPS lands from allowing game meat to be purchased and sold

Proposal 93: exempt NPS lands from state regulation allowing trapping with a gun

Proposal 94: exempt NPS lands from wolf trapping seasons that extend into months when pups are born

Proposal 97: exempt NPS lands from the use of artificial light (spotlighting) to kill bears in dens

Proposal 109: exempt NPS lands from killing bear cubs and sows with cubs

Proposal 121: exempt NPS lands from bear baiting or the use of scent lures

Proposal 126: exempt NPS lands from trapping of black bears

Thank you.

Sincerely,

Ms. Gabrielle Karraw
4210 SE Bybee Blvd
Portland, OR 97206-7753
(503) 679-9890



Dec 16, 2011

Chairman Cliff Judkins

Alaska Board of Game, Alaska Dept. of Fish and Game, Beard Supports
Section, P.O. Box 115526
Juneau, AK 99811-5526

Dear Chairman Judkins,

Please leave these animals alone. They are not meant to be abused for our pleasure. Alaska's national parks and preserves attract visitors from around the world for opportunities including seeing wildlife such as bears and wolves. I believe that wildlife living on lands managed by the National Park Service should be exempt from certain state of Alaska hunting regulations. The Park Service is charged by Congress to protect natural and healthy wildlife populations. It is prohibited from manipulating one wildlife population for the benefit of another (i.e. increasing the harvest of wolves and bears to benefit moose and caribou). The state of Alaska, on the other hand, is charged with maximizing wildlife for human consumption. Obviously, there is a conflict between these two different ways of managing wildlife.

Over the years, the state of Alaska has adopted hunting regulations that both encourage a higher harvest of and/or make it easier to kill wolves and bears. National Park Service lands should be exempt from those regulations. I support and urge you to support the following seven proposals which will be considered at the January 2012 meeting in Anchorage:

Proposal 49: exempt NPS lands from allowing game meat to be purchased and sold

Proposal 93: exempt NPS lands from state regulation allowing trapping with a gun

Proposal 94: exempt NPS lands from wolf trapping seasons that extend into months when pups are born

Proposal 97: exempt NPS lands from the use of artificial light (spotlighting) to kill bears in dens

Proposal 109: exempt NPS lands from killing bear cubs and sows with cubs

Proposal 121: exempt NPS lands from bear baiting or the use of scent lures

Proposal 126: exempt NPS lands from trapping of black bears

Thank you.

Sincerely,

Ms. Phyllis Cordero
18265 SW Morse Ln
Aloha, OR 97006-3874



Dec 10, 2011

Chairman Cliff Judkins

Alaska Board of Game, Alaska Dept. of Fish and Game, Beard Supports
Section, P.O. Box 115526
Juneau, AK 99811-5526

Dear Chairman Judkins,

Alaska's national parks and preserves attract visitors from around the world for opportunities including seeing wildlife such as bears and wolves. I believe that wildlife living on lands managed by the National Park Service should be exempt from certain state of Alaska hunting regulations. The Park Service is charged by Congress to protect natural and healthy wildlife populations. It is prohibited from manipulating one wildlife population for the benefit of another (i.e. increasing the harvest of wolves and bears to benefit moose and caribou). The state of Alaska, on the other hand, is charged with maximizing wildlife for human consumption. Obviously, there is a conflict between these two different ways of managing wildlife.

Over the years, the state of Alaska has adopted hunting regulations that both encourage a higher harvest of and/or make it easier to kill wolves and bears. National Park Service lands should be exempt from those regulations. I support and urge you to support the following seven proposals which will be considered at the January 2012 meeting in Anchorage:

Proposal 48: exempt NPS lands from allowing game meat to be purchased and sold.

Proposal 93: exempt NPS lands from state regulation allowing trapping with a gun.

Proposal 94: exempt NPS lands from wolf trapping seasons that extend into months when pups are born.

Proposal 97: exempt NPS lands from the use of artificial light (spotlighting) to kill bears in dens.

Proposal 109: exempt NPS lands from killing bear cubs and sows with cubs.

Proposal 121: exempt NPS lands from bear baiting or the use of scent lures.

Proposal 126: exempt NPS lands from trapping of black bears. Don't allow Alaska's ecosystem to be degraded in the manner of that of the lower 48. Thank you.

Sincerely,

Mr. John Dunn
PO Box 1024
Vashon, WA 98070-1024
(206) 903-9639



Dec 9, 2011

Chairman Cliff Judkins

Alaska Board of Game, Alaska Dept. of Fish and Game, Beard Supports
Section, P.O. Box 115526
Juneau, AK 99811-5526

Dear Chairman Judkins,

Alaska's national parks and preserves attract visitors from around the world for opportunities including seeing wildlife such as bears and wolves. I believe that wildlife living on lands managed by the National Park Service should be exempt from certain state of Alaska hunting regulations. The Park Service is charged by Congress to protect natural and healthy wildlife populations. It is prohibited from manipulating one wildlife population for the benefit of another (i.e. increasing the harvest of wolves and bears to benefit moose and caribou). The state of Alaska, on the other hand, is charged with maximizing wildlife for human consumption. Obviously, there is a conflict between these two different ways of managing wildlife.

Over the years, the state of Alaska has adopted hunting regulations that both encourage a higher harvest of and/or make it easier to kill wolves and bears. National Park Service lands should be exempt from those regulations. I support and urge you to support the following seven proposals which will be considered at the January 2012 meeting in Anchorage:

Proposal 48: exempt NPS lands from allowing game meat to be purchased and sold

Proposal 93: exempt NPS lands from state regulation allowing trapping with a gun

Proposal 94: exempt NPS lands from wolf trapping seasons that extend into months when pups are born

Proposal 97: exempt NPS lands from the use of artificial light (spotlighting) to kill bears in dens

Proposal 109: exempt NPS lands from killing bear cubs and sows with cubs

Proposal 121: exempt NPS lands from bear baiting or the use of scent lures

Proposal 126: exempt NPS lands from trapping of black bears

This is very inhumane and ridiculous that you do this. Don't hunters have enough on their side already with their guns?

Thank you.

Sincerely,

Ms. Barbara Lynn Voss
7001 NE 137th St
Kirkland, WA 98034-5010



Dec 9, 2011

Chairman Cliff Judkins

Alaska Board of Game, Alaska Dept. of Fish and Game, Beard Supports
Section, P.O. Box 115526
Juneau, AK 99811-5526

Dear Chairman Judkins,

I am an Oregon resident, but my visit to Alaska a few years ago stands as one of the highlights of my life. Alaska's national parks and preserves attract visitors from around the world for opportunities including seeing wildlife such as bears and wolves. I believe that wildlife living on lands managed by the National Park Service should be exempt from certain state of Alaska hunting regulations. The Park Service is charged by Congress to protect natural and healthy wildlife populations. It is prohibited from manipulating one wildlife population for the benefit of another (i.e. increasing the harvest of wolves and bears to benefit moose and caribou). The state of Alaska, on the other hand, is charged with maximizing wildlife for human consumption. Obviously, there is a conflict between these two different ways of managing wildlife.

Over the years, the state of Alaska has adopted hunting regulations that both encourage a higher harvest of and/or make it easier to kill wolves and bears. National Park Service lands should be exempt from these regulations. I support and urge you to support the following seven proposals which will be considered at the January 2012 meeting in Anchorage:

Proposal 48: exempt NPS lands from allowing game meat to be purchased and sold

Proposal 93: exempt NPS lands from state regulation allowing trapping with a gun

Proposal 94: exempt NPS lands from wolf trapping seasons that extend into months when pups are born

Proposal 97: exempt NPS lands from the use of artificial light (spotlighting) to kill bears in dens

Proposal 109: exempt NPS lands from killing bear cubs and sows with cubs

Proposal 121: exempt NPS lands from bear baiting or the use of scent lures

Proposal 126: exempt NPS lands from trapping of black bears

Thank you.

Sincerely,

Mr. Rhett Lawrence
6445 N Commercial Ave
Portland, OR 97217-2024
(503) 286-0215



Dec 10, 2011

Chairman Cliff Judkins

Alaska Board of Game, Alaska Dept. of Fish and Game, Beard Supports
Section, P.O. Box 115526
Juneau, AK 99811-5526

Dear Chairman Judkins,

Alaska's national parks and preserves attract visitors from around the world for opportunities including seeing wildlife such as bears and wolves. I believe that wildlife living on lands managed by the National Park Service should be exempt from certain state of Alaska hunting regulations. The Park Service is charged by Congress to protect natural and healthy wildlife populations. It is prohibited from manipulating one wildlife population for the benefit of another (i.e. increasing the harvest of wolves and bears to benefit moose and caribou). The state of Alaska, on the other hand, is charged with maximizing wildlife for human consumption. Obviously, there is a conflict between these two different ways of managing wildlife.

Over the years, the state of Alaska has adopted hunting regulations that both encourage a higher harvest of and/or make it easier to kill wolves and bears. National Park Service lands should be exempt from those regulations. I support and urge you to support the following seven proposals which will be considered at the January 2012 meeting in Anchorage:

Proposal 48: exempt NPS lands from allowing game meat to be purchased and sold

Proposal 93: exempt NPS lands from state regulation allowing trapping with a gun

Proposal 94: exempt NPS lands from wolf trapping seasons that extend into months when pups are born

Proposal 97: exempt NPS lands from the use of artificial light (spotlighting) to kill bears in dens

Proposal 109: exempt NPS lands from killing bear cubs and sows with cubs

Proposal 121: exempt NPS lands from bear baiting or the use of scent lures

Proposal 126: exempt NPS lands from trapping of black bears. I HUNT IN WA STATE and WOULD NEVER USE THESE METHODS. IT IS UNSPORTSMAN BEHAVIOR. WHAT IS WRONG WITH THE AL. Hunters?

Sincerely,

Mr. Paul Tomlinson Family
2245 NW 64th St
Seattle, WA 98107-2442
(206) 784-4990



Stephen A Stidham

900 Laidoey Drive • North Pole, Alaska 99705 • Phone • 907-460-1006
E-Mail: stid2677@aol.com

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

Dear Alaska Board of Game, Boards Support Section,

I SUPPORT

PROPOSAL 89 - 5 AAC, Chapter 85, Seasons and bag limits. Convert all nonresident sheep seasons to drawing permits and limit to 10 percent of total permits.

The new regulation would state that all nonresident sheep tags would go to a draw-only permit system. The total number of nonresident tags would be allotted geographically so as the total will not exceed 10 percent of the total number of hunters in the region, similar to other states' systems. To establish a number of nonresident tags, the board should use geographical data and previous harvest data as the numbers are fairly consistent from year to year.

For the last 4 years I have had my sheep hunting opportunities affected by guides and non-resident sheep hunters. Through either direct conflict on the ground with guides or by Air Transporters refusing to fly me into drainages because guides work that drainage. The quality of sheep hunting for residents is very poor in many areas where both guides and nonresidents have no limits, because of these issues.

To continue to allow non residents to have primary access to our best sheep hunting areas is unfair to resident sheep hunters. On two of my last 4 hunts I have encountered guide camps setup before the start of the season and had guides inform me that they were waiting on clients to arrive and that they were going to hunt the valleys I had planned on accessing. These were NOT friendly encounters. Guides are dominating state land and thereby blocking residents from having sheep hunting opportunity into the prime areas that sheep inhabit. Guides are influencing Air Transporters to not fly residents in their areas by threatening to withhold their business if they do. Please support this proposal to give resident sheep hunters a fair chance at our ALASKAN sheep resource.

Respectfully yours,



Stephen A Stidham



Dec 9, 2011

Chairman Cliff Judkins

Alaska Board of Game, Alaska Dept. of Fish and Game, Beard Supports
Section, P.O. Box 115526
Juneau, AK 99811-5526

Dear Chairman Judkins,

Alaska's national parks and preserves attract visitors from around the world for opportunities including seeing wildlife such as bears and wolves. I believe that wildlife living on lands managed by the National Park Service should be exempt from certain state of Alaska hunting regulations. The Park Service is charged by Congress to protect natural and healthy wildlife populations. It is prohibited from manipulating one wildlife population for the benefit of another (i.e. increasing the harvest of wolves and bears to benefit moose and caribou). The state of Alaska, on the other hand, is charged with maximizing wildlife for human consumption. Obviously, there is a conflict between these two different ways of managing wildlife.

Over the years, the state of Alaska has adopted hunting regulations that both encourage a higher harvest of and/or make it easier to kill wolves and bears. National Park Service lands should be exempt from those regulations.

Please give equal consideration to those of us who treasure wolves and bears ALIVE and not as trophies of some sort.

I support and urge you to support the following seven proposals which will be considered at the January 2012 meeting in Anchorage:

Proposal 48: exempt NPS lands from allowing game meat to be purchased and sold

Proposal 93: exempt NPS lands from state regulation allowing trapping with a gun

Proposal 94: exempt NPS lands from wolf trapping seasons that extend into months when pups are born

Proposal 97: exempt NPS lands from the use of artificial light (spotlighting) to kill bears in dens

Proposal 109: exempt NPS lands from killing Bear cubs and sows with cubs

Proposal 121: exempt NPS lands from bear baiting or the use of scent lures

Proposal 126: exempt NPS lands from trapping of black bears

Thank you.

Sincerely,

Ms. Marianne White
2849 W Maplewood Ave
Bellingham, WA 98225-1280
(360) 734-9147



Dec 9, 2011

Chairman Cliff Judkins

Alaska Board of Game, Alaska Dept. of Fish and Game, Beard Supports
Section, P.O. Box 115526
Juneau, AK 99811-5526

Dear Chairman Judkins,

Alaska's national parks and preserves attract visitors from around the world for opportunities including seeing wildlife such as bears and wolves. I believe that wildlife living on lands managed by the National Park Service should be exempt from certain state of Alaska hunting regulations. The Park Service is charged by Congress to protect natural and healthy wildlife populations. It is prohibited from manipulating one wildlife population for the benefit of another (i.e. increasing the harvest of wolves and bears to benefit moose and caribou). The state of Alaska, on the other hand, is charged with maximizing wildlife for human consumption. Obviously, there is a conflict between these two different ways of managing wildlife.

I believe we need to protect our environment from total destruction and I believe that the parks and recreations holds a higher responsibility to do so.

Over the years, the state of Alaska has adopted hunting regulations that both encourage a higher harvest of and/or make it easier to kill wolves and bears. National Park Service lands should be exempt from those regulations. I support and urge you to support the following seven proposals which will be considered at the January 2012 meeting in Anchorage:

Proposal 48: exempt NPS lands from allowing game meat to be purchased and sold

Proposal 93: exempt NPS lands from state regulation allowing trapping with a gun

Proposal 94: exempt NPS lands from wolf trapping seasons that extend into months when pups are born

Proposal 97: exempt NPS lands from the use of artificial light (spotlighting) to kill bears in dens

Proposal 109: exempt NPS lands from killing Bear cubs and sows with cubs

Proposal 121: exempt NPS lands from bear baiting or the use of scent lures

Proposal 126: exempt NPS lands from trapping of black bears

Thank you.

Sincerely,

Ms. Elizabeth Borges
PO Box 754
Redmond, WA 98073-0754



Dec 16, 2011

Chairman Cliff Judkins

Alaska Board of Game, Alaska Dept. of Fish and Game, Beard Supports
Section, P.O. Box 115526
Juneau, AK 99811-5526

Dear Chairman Judkins,

Alaska's national parks and preserves attract visitors from around the world for opportunities including seeing wildlife such as bears and wolves. I believe that wildlife living on lands managed by the National Park Service should be exempt from certain state of Alaska hunting regulations. The Park Service is charged by Congress to protect natural and healthy wildlife populations. It is prohibited from manipulating one wildlife population for the benefit of another (i.e. increasing the harvest of wolves and bears to benefit moose and caribou). The state of Alaska, on the other hand, is charged with maximizing wildlife for human consumption. Obviously, there is a conflict between these two different ways of managing wildlife.

Over the years, the state of Alaska has adopted hunting regulations that both encourage a higher harvest of and/or make it easier to kill wolves and bears. National Park Service lands should be exempt from those regulations. I support and urge you to support the following seven proposals which will be considered at the January 2012 meeting in Anchorage:

Proposal 48: exempt NPS lands from allowing game meat to be purchased and sold

Proposal 93: exempt NPS lands from state regulation allowing trapping with a gun

Proposal 94: exempt NPS lands from wolf trapping seasons that extend into months when pups are born

Proposal 97: exempt NPS lands from the use of artificial light (spotlighting) to kill bears in dens

Proposal 109: exempt NPS lands from killing bear cubs and sows with cubs

Proposal 121: exempt NPS lands from bear baiting or the use of scent lures

Proposal 126: exempt NPS lands from trapping of black bears

Thank you. Someone needs to voice a hope that our species will take the responsibility for the stewardship of all the life on this planet including our own.

Sincerely,

Mrs. Renee Eder
1037 Tolo Trl
Moscow, ID 83843-8767
(208) 883-4770



Dec 16, 2011

Chairman Cliff Judkins

Alaska Board of Game, Alaska Dept. of Fish and Game, Beard Supports
Section, P.O. Box 115526
Juneau, AK 99811-5526

Dear Chairman Judkins,

Alaska's national parks and preserves attract visitors from around the world for opportunities including seeing wildlife such as bears and wolves. I believe that wildlife living on lands managed by the National Park Service should be exempt from certain state of Alaska hunting regulations. The Park Service is charged by Congress to protect natural and healthy wildlife populations. It is prohibited from manipulating one wildlife population for the benefit of another (i.e. increasing the harvest of wolves and bears to benefit moose and caribou). The state of Alaska, on the other hand, is charged with maximizing wildlife for human consumption. Obviously, there is a conflict between these two different ways of managing wildlife.

Animals have just as much if not more right to their homes (because they can't protest) than we do!! Why have animal protection laws if this is what we do anyway??

Over the years, the state of Alaska has adopted hunting regulations that both encourage a higher harvest of and/or make it easier to kill wolves and bears. National Park Service lands should be exempt from those regulations. I support and urge you to support the following seven proposals which will be considered at the January 2012 meeting in Anchorage:

Proposal 48: exempt NPS lands from allowing game meat to be purchased and sold

Proposal 93: exempt NPS lands from state regulation allowing trapping with a gun

Proposal 94: exempt NPS lands from wolf trapping seasons that extend into months when pups are born

Proposal 97: exempt NPS lands from the use of artificial light (spotlighting) to kill bears in dens

Proposal 109: exempt NPS lands from killing Bear cubs and sows with cubs

Proposal 121: exempt NPS lands from bear baiting or the use of scent lures

Proposal 126: exempt NPS lands from trapping of black bears

Thank you.

Sincerely,

Mr. Timothy Mathiason
3397 3rd Ave SE
Salem, OR 97302-4601



Dec 10, 2011

Chairman Cliff Judkins

Alaska Board of Game, Alaska Dept. of Fish and Game, Beard Supports
Section, P.O. Box 115526
Juneau, AK 99811-5526

Dear Chairman Judkins,

Please review the science behind this kind of slaughter and do the right thing. These animals are a part of the balance of life and should not be murdered in this manner. Alaska's national parks and preserves attract visitors from around the world for opportunities including seeing wildlife such as bears and wolves. I believe that wildlife living on lands managed by the National Park Service should be exempt from certain state of Alaska hunting regulations. The Park Service is charged by Congress to protect natural and healthy wildlife populations. It is prohibited from manipulating one wildlife population for the benefit of another (i.e. increasing the harvest of wolves and bears to benefit moose and caribou). The state of Alaska, on the other hand, is charged with maximizing wildlife for human consumption. Obviously, there is a conflict between these two different ways of managing wildlife.

Over the years, the state of Alaska has adopted hunting regulations that both encourage a higher harvest of and/or make it easier to kill wolves and bears. National Park Service lands should be exempt from those regulations. I support and urge you to support the following seven proposals which will be considered at the January 2012 meeting in Anchorage:

Proposal 48: exempt NPS lands from allowing game meat to be purchased and sold

Proposal 93: exempt NPS lands from state regulation allowing trapping with a gun

Proposal 94: exempt NPS lands from wolf trapping seasons that extend into months when pups are born

Proposal 97: exempt NPS lands from the use of artificial light (spotlighting) to kill bears in dens

Proposal 109: exempt NPS lands from killing bear cubs and sows with cubs

Proposal 121: exempt NPS lands from bear baiting or the use of scent lures

Proposal 126: exempt NPS lands from trapping of black bears

Thank you.

Sincerely,

Ms. Sherry Bottoms
PO Box 2263
Vashon, WA 98070-2263
(907) 310-7415



Dec 10, 2011

Chairman Cliff Judkins

Alaska Board of Game, Alaska Dept. of Fish and Game, Beard Supports
Section, P.O. Box 115526
Juneau, AK 99811-5526

Dear Chairman Judkins,

Alaska's national parks and preserves attract visitors from around the world for opportunities including seeing wildlife such as bears and wolves. I believe that wildlife living on lands managed by the National Park Service should be exempt from certain state of Alaska hunting regulations unless the state assumes all responsibilities for the parks, and I sure do not want that. But if the state of Alaska pays all expenses for the national park system for the nation, I'd consider it.

The national Park Service is charged by Congress to protect natural and healthy wildlife populations. It is prohibited from manipulating one wildlife population for the benefit of another (i.e. increasing the harvest of wolves and bears to benefit moose and caribou). The state of Alaska, on the other hand, is charged with maximizing wildlife for human consumption. Obviously, there is a conflict between these two different ways of managing wildlife.

Over the years, the state of Alaska has adopted hunting regulations that both encourage a higher harvest of and/or make it easier to kill wolves and bears. National Park Service lands should be exempt from those regulations. I support and urge you to support the following seven proposals which will be considered at the January 2012 meeting in Anchorage:

Proposal 48: exempt NPS lands from allowing game meat to be purchased and sold

Proposal 93: exempt NPS lands from state regulation allowing trapping with a gun

Proposal 94: exempt NPS lands from wolf trapping seasons that extend into months when pups are born

Proposal 97: exempt NPS lands from the use of artificial light (spotlighting) to kill bears in dens

Proposal 109: exempt NPS lands from killing bear cubs and sows with cubs

Proposal 121: exempt NPS lands from bear baiting or the use of scent lures

Proposal 126: exempt NPS lands from trapping of black bears

Thank you.

Sincerely,

Mr. Albert Banwart
95 Sir Arthur Dr
Bozeman, MT 59718-7817



Dec 8, 2011

Chairman Cliff Judkins

Alaska Board of Game, Alaska Dept. of Fish and Game, Beard Supports
Section, P.O. Box 115526
Juneau, AK 99811-5526

Dear Chairman Judkins,

Alaska's national parks and preserves attract visitors from around the world for opportunities including seeing wildlife such as bears and wolves. I believe that wildlife living on lands managed by the National Park Service should be exempt from certain state of Alaska hunting regulations. The Park Service is charged by Congress to protect natural and healthy wildlife populations. It is prohibited from manipulating one wildlife population for the benefit of another (i.e. increasing the harvest of wolves and bears to benefit moose and caribou). The state of Alaska, on the other hand, is charged with maximizing wildlife for human consumption. Obviously, there is a conflict between these two different ways of managing wildlife.

We enjoy visiting your state but are less inclined to when we hear such outlandish proposals. We paid a sum last year to go to British Columbia to watch bears feed in an undisturbed environment. It would be wonderful to do the same in Alaska.

Over the years, the state of Alaska has adopted hunting regulations that both encourage a higher harvest of and/or make it easier to kill wolves and bears. National Park Service lands should be exempt from those regulations. I support and urge you to support the following seven proposals which will be considered at the January 2012 meeting in Anchorage:

Proposal 48: exempt NPS lands from allowing game meat to be purchased and sold

Proposal 93: exempt NPS lands from state regulation allowing trapping with a gun

Proposal 94: exempt NPS lands from wolf trapping seasons that extend into months when pups are born

Proposal 97: exempt NPS lands from the use of artificial light (spotlighting) to kill bears in dens

Proposal 109: exempt NPS lands from killing bear cubs and sows with cubs

Proposal 121: exempt NPS lands from bear baiting or the use of scent lures

Proposal 126: exempt NPS lands from trapping of black bears

Thank you.

Sincerely,

Mr. Eugene Kiver
4210 Tyler Way
Anacortes, WA 98221-2244
(360) 299-2759



Dec 10, 2011

Chairman Cliff Judkins

Alaska Board of Game, Alaska Dept. of Fish and Game, Beard Supports
Section, P.O. Box 115526
Juneau, AK 99811-5526

Dear Chairman Judkins,

Alaska's national parks and preserves attract visitors from around the world for opportunities including seeing wildlife such as bears and wolves. I believe that wildlife living on lands managed by the National Park Service should be exempt from certain state of Alaska hunting regulations. The Park Service is charged by Congress to protect natural and healthy wildlife populations. It is prohibited from manipulating one wildlife population for the benefit of another (i.e. increasing the harvest of wolves and bears to benefit moose and caribou). The state of Alaska, on the other hand, is charged with maximizing wildlife for human consumption. Obviously, there is a conflict between these two different ways of managing wildlife.

Over the years, the state of Alaska has adopted hunting regulations that both encourage a higher harvest of and/or make it easier to kill wolves and bears. National Park Service lands should be exempt from those regulations. I support and urge you to support the following seven proposals which will be considered at the January 2012 meeting in Anchorage:

Proposal 48: exempt NPS lands from allowing game meat to be purchased and sold

Proposal 93: exempt NPS lands from state regulation allowing trapping with a gun

Proposal 94: exempt NPS lands from wolf trapping seasons that extend into months when pups are born

Proposal 97: exempt NPS lands from the use of artificial light (spotlighting) to kill bears in dens

Proposal 109: exempt NPS lands from killing bear cubs and sows with cubs

Proposal 121: exempt NPS lands from bear baiting or the use of scent lures

Proposal 126: exempt NPS lands from trapping of black bears

You need to stop killing the wildlife who have been here a hell of a lot longer than any human has! We depend on what the wildlife does in each state and we are already infringing on their habitat. Stop Killing the animals and their habitats!

Thank you.

Sincerely,

Ms. Dee Hudson
1424 148th Ave SE Apt B3
Bellevue, WA 98007-5728
(425) 232-6693



Dec 16, 2011

Chairman Cliff Judkins

Alaska Board of Game, Alaska Dept. of Fish and Game, Beard Supports
Section, P.O. Box 115526
Juneau, AK 99811-5526

Dear Chairman Judkins,

Please keep our Alaska National Parks exempt from some of Alaska's hunting laws. National laws supercede state laws in many arenas, and this should be done here also. When I go to a NP, I do NOT want to see hunting, trapping, OR baiting.

Alaska's national parks and preserves attract visitors from around the world for opportunities including seeing wildlife such as bears and wolves. I believe that wildlife living on lands managed by the National Park Service should be exempt from certain state of Alaska hunting regulations. The Park Service is charged by Congress to protect natural and healthy wildlife populations. It is prohibited from manipulating one wildlife population for the benefit of another (i.e. increasing the harvest of wolves and bears to benefit moose and caribou). The state of Alaska, on the other hand, is charged with maximizing wildlife for human consumption. Obviously, there is a conflict between these two different ways of managing wildlife.

Over the years, the state of Alaska has adopted hunting regulations that both encourage a higher harvest of and/or make it easier to kill wolves and bears. National Park Service lands should be exempt from those regulations. I support and urge you to support the following seven proposals which will be considered at the January 2012 meeting in Anchorage:

Proposal 48: exempt NPS lands from allowing game meat to be purchased and sold

Proposal 93: exempt NPS lands from state regulation allowing trapping with a gun

Proposal 94: exempt NPS lands from wolf trapping seasons that extend into months when pups are born

Proposal 97: exempt NPS lands from the use of artificial light (spotlighting) to kill bears in dens

Proposal 109: exempt NPS lands from killing bear cubs and sows with cubs

Proposal 121: exempt NPS lands from bear baiting or the use of scent lures

Proposal 126: exempt NPS lands from trapping of black bears

Thank you.

Sincerely,

Ms. Beth Nelson
18740 23rd Ave NE
Lake Forest Park, WA 98155-2407
(206) 361-3742



Dec 8, 2011

Chairman Cliff Judkins

Alaska Board of Game, Alaska Dept. of Fish and Game, Beard Supports
Section, P.O. Box 115526
Juneau, AK 99811-5526

Dear Chairman Judkins,

Alaska's national parks and preserves attract visitors from around the world for opportunities including seeing wildlife such as bears and wolves. I believe that wildlife living on lands managed by the National Park Service should be exempt from certain state of Alaska hunting regulations. The Park Service is charged by Congress to protect natural and healthy wildlife populations. It is prohibited from manipulating one wildlife population for the benefit of another (i.e. increasing the harvest of wolves and bears to benefit moose and caribou). The state of Alaska, on the other hand, is charged with maximizing wildlife for human consumption. Obviously, there is a conflict between these two different ways of managing wildlife.

Over the years, the state of Alaska has adopted hunting regulations that both encourage a higher harvest of and/or make it easier to kill wolves and bears. National Park Service lands should be exempt from these regulations.

The park should not be turned into some sort of game reserve for hunters, and yet the selective culling of certain species will do just that. If the ecosystems and beautiful landscape of the park are to be preserved, then the populations of wolves and bears must also be preserved.

I support and urge you to support the following seven proposals which will be considered at the January 2012 meeting in Anchorage:

Proposal 48: exempt NFS lands from allowing game meat to be purchased and sold

Proposal 93: exempt NFS lands from state regulation allowing trapping with a gun

Proposal 94: exempt NFS lands from wolf trapping seasons that extend into months when pups are born

Proposal 97: exempt NFS lands from the use of artificial light (spotlighting) to kill bears in dens

Proposal 109: exempt NPS lands from killing bear cubs and sows with cubs

Proposal 121: exempt NPS lands from bear baiting or the use of scent lures

Proposal 126: exempt NPS lands from trapping of black bears

Thank you.

Sincerely,

Ms. Felicity Devlin
2417 N Washington St
Tacoma, WA 98406-5839
(252) 761-8066



Dec 9, 2011

Chairman Cliff Judkins

Alaska Board of Game, Alaska Dept. of Fish and Game, Beard Supports
Section, P.O. Box 115526
Juneau, AK 99811-5526

Dear Chairman Judkins,

Alaska's national parks and preserves attract visitors from around the world for opportunities including seeing wildlife such as bears and wolves. I believe that wildlife living on lands managed by the National Park Service should be exempt from certain state of Alaska hunting regulations. The Park Service is charged by Congress to protect natural and healthy wildlife populations. It is prohibited from manipulating one wildlife population for the benefit of another (i.e. increasing the harvest of wolves and bears to benefit moose and caribou). The state of Alaska, on the other hand, is charged with maximizing wildlife for human consumption. Obviously, there is a conflict between these two different ways of managing wildlife.

Over the years, the state of Alaska has adopted hunting regulations that both encourage a higher harvest of and/or make it easier to kill wolves and bears. National Park Service lands should be exempt from those regulations. I support and urge you to support the following seven proposals which will be considered at the January 2012 meeting in Anchorage:

Proposal 48: exempt NPS lands from allowing game meat to be purchased and sold

Proposal 93: exempt NPS lands from state regulation allowing trapping with a gun

Proposal 94: exempt NPS lands from wolf trapping seasons that extend into months when pups are born

Proposal 97: exempt NPS lands from the use of artificial light (spotlighting) to kill bears in dens

Proposal 109: exempt NPS lands from killing bear cubs and sows with cubs

Proposal 121: exempt NPS lands from bear baiting or the use of scent lures

Proposal 126: exempt NPS lands from trapping of black bears

Wild lands managed to promote the health of predator "apex" animals result in healthy ecosystems throughout. This is how NPS lands should be managed in my opinion. I sincerely hope the State of Alaska does not continue to threaten the existence of these critical species. Thank you.

Sincerely,

Ms. Judith Stauffer
2940 Crescent Ave Unit 209
Eugene, OR 97408-7404
(541) 543-5895



Dec 10, 2011

Chairman Cliff Judkins

Alaska Board of Game, Alaska Dept. of Fish and Game, Beard Supports
Section, P.O. Box 115526
Juneau, AK 99811-5526

Dear Chairman Judkins,

Alaskan bears and wolves are important members of the Alaskan national parks and preserves that not only attract ecotourists but make the preserves healthy places for other wildlife. These preserves should not be managed only for hunters but for the majority of visitors who want to experience wild Alaska.

Alaska's national parks and preserves attract visitors from around the world for opportunities including seeing wildlife such as bears and wolves. I believe that wildlife living on lands managed by the National Park Service should be exempt from certain state of Alaska hunting regulations. The Park Service is charged by Congress to protect natural and healthy wildlife populations. It is prohibited from manipulating one wildlife population for the benefit of another (i.e. increasing the harvest of wolves and bears to benefit moose and caribou). The state of Alaska, on the other hand, is charged with maximizing wildlife for human consumption. Obviously, there is a conflict between these two different ways of managing wildlife.

Over the years, the state of Alaska has adopted hunting regulations that both encourage a higher harvest of and/or make it easier to kill wolves and bears. National Park Service lands should be exempt from those regulations. I support and urge you to support the following seven proposals which will be considered at the January 2012 meeting in Anchorage:

Proposal 48: exempt NPS lands from allowing game meat to be purchased and sold

Proposal 93: exempt NPS lands from state regulation allowing trapping with a gun

Proposal 94: exempt NPS lands from wolf trapping seasons that extend into months when pups are born

Proposal 97: exempt NPS lands from the use of artificial light (spotlighting) to kill bears in dens

Proposal 109: exempt NPS lands from killing bear cubs and sows with cubs

Proposal 121: exempt NPS lands from bear baiting or the use of scent lures

Proposal 126: exempt NPS lands from trapping of black bears

Thank you.

Sincerely,

Mr. Marcus Lanskey
3867 Potter St
Eugene, OR 97405-4516



Dec 16, 2011

Chairman Cliff Judkins

Alaska Board of Game, Alaska Dept. of Fish and Game, Beard Supports
Section, P.O. Box 115526
Juneau, AK 99811-5526

Dear Chairman Judkins,

When my husband and I get to visit Alaska's National Parks I expect them to be wild and unadulterated, not managed and tampered with for the benefit of hunters. Why else would we spend our money to visit them? We can stay home and see the results of poor natural management and favoritism right here in WA state.

Alaska's national parks and preserves attract visitors from around the world for opportunities including seeing wildlife such as bears and wolves. I believe that wildlife living on lands managed by the National Park Service should be exempt from certain state of Alaska hunting regulations. The Park Service is charged by Congress to protect natural and healthy wildlife populations. It is prohibited from manipulating one wildlife population for the benefit of another (i.e. increasing the harvest of wolves and bears to benefit moose and caribou). The state of Alaska, on the other hand, is charged with maximizing wildlife for human consumption. Obviously, there is a conflict between these two different ways of managing wildlife.

Over the years, the state of Alaska has adopted hunting regulations that both encourage a higher harvest of and/or make it easier to kill wolves and bears. National Park Service lands should be exempt from those regulations. I support and urge you to support the following seven proposals which will be considered at the January 2012 meeting in Anchorage:

Proposal 48: exempt NPS lands from allowing game meat to be purchased and sold

Proposal 93: exempt NPS lands from state regulation allowing trapping with a gun

Proposal 94: exempt NPS lands from wolf trapping seasons that extend into months when pups are born

Proposal 97: exempt NPS lands from the use of artificial light (spotlighting) to kill bears in dens

Proposal 109: exempt NPS lands from killing bear cubs and sows with cubs

Proposal 121: exempt NPS lands from bear baiting or the use of scent lures

Proposal 126: exempt NPS lands from trapping of black bears

Thank you.

Sincerely,

Ms. Denée Scribner
1113 E 2nd Ave
Ellensburg, WA 98926-3520



Dec 10, 2011

Chairman Cliff Judkins

Alaska Board of Game, Alaska Dept. of Fish and Game, Beard Supports
Section, P.O. Box 115526
Juneau, AK 99811-5526

Dear Chairman Judkins,

Alaska's national parks and preserves attract visitors from around the world for opportunities including seeing wildlife such as bears and wolves. I believe that wildlife living on lands managed by the National Park Service should be exempt from certain state of Alaska hunting regulations. The Park Service is charged by Congress to protect natural and healthy wildlife populations. It is prohibited from manipulating one wildlife population for the benefit of another (i.e. increasing the harvest of wolves and bears to benefit moose and caribou). The state of Alaska, on the other hand, is charged with maximizing wildlife for human consumption. Obviously, there is a conflict between these two different ways of managing wildlife.

Over the years, the state of Alaska has adopted hunting regulations that both encourage a higher harvest of and/or make it easier to kill wolves and bears. National Park Service lands should be exempt from those regulations. I support and urge you to support the following seven proposals which will be considered at the January 2012 meeting in Anchorage:

Proposal 48: exempt NPS lands from allowing game meat to be purchased and sold

Proposal 93: exempt NPS lands from state regulation allowing trapping with a gun

Proposal 94: exempt NPS lands from wolf trapping seasons that extend into months when pups are born

Proposal 97: exempt NPS lands from the use of artificial light (spotlighting) to kill bears in dens

Proposal 109: exempt NPS lands from killing bear cubs and sows with cubs

Proposal 121: exempt NPS lands from bear baiting or the use of scent lures

Proposal 126: exempt NPS lands from trapping of black bears
I can't believe you you are taking this OMAP into national parks. It's bad enough that it's going on everywhere else. I am so tired of predator destruction in the state of Alaska. You people are heartless, gutless, and spineless....all so the ultimate predator, man, can hunt. Mind sharing the ungulates with other species??

Sincerely,

Ms. Renee Demartin
4408 Delridge Way SW Apt 312
Seattle, WA 98106-1347



Dec 16, 2011

Chairman Cliff Judkins

Alaska Board of Game, Alaska Dept. of Fish and Game, Beard Supports
Section, P.O. Box 115526
Juneau, AK 99811-5526

Dear Chairman Judkins,

Alaska's national parks and preserves attract visitors from around the world for opportunities including seeing wildlife such as bears and wolves. I believe that wildlife living on lands managed by the National Park Service should be exempt from certain state of Alaska hunting regulations. The Park Service is charged by Congress to protect natural and healthy wildlife populations. It is prohibited from manipulating one wildlife population for the benefit of another (i.e. increasing the harvest of wolves and bears to benefit moose and caribou). The state of Alaska, on the other hand, is charged with maximizing wildlife for human consumption. Obviously, there is a conflict between these two different ways of managing wildlife.

Over the years, the state of Alaska has adopted hunting regulations that both encourage a higher harvest of and/or make it easier to kill wolves and bears. National Park Service lands should be exempt from those regulations. I support and urge you to support the following seven proposals which will be considered at the January 2012 meeting in Anchorage:

Proposal 48: exempt NPS lands from allowing game meat to be purchased and sold.

Proposal 93: exempt NPS lands from state regulation allowing trapping with a gun.

Proposal 94: exempt NPS lands from wolf trapping seasons that extend into months when pups are born.

Proposal 97: exempt NPS lands from the use of artificial light (spotlighting) to kill bears in dens.

Proposal 109: exempt NPS lands from killing bear cubs and sows with cubs.

Proposal 121: exempt NPS lands from bear baiting or the use of scent lures.

Proposal 126: exempt NPS lands from trapping of black bears.

Alaska's selfish and predatory hunting, trapping, slaughter of its wildlife is horrible and inhumane. Wolves, bears, foxes are as important to Alaska's ecosystems as all the herd animals. They cull the weak, maintaining and strengthening healthy herds. They are also valuable in reducing overpopulations of rodents. Please change your policies as per above proposals.

Thank you.

Sincerely,

Ms. Lorinda Roland
PO Box 55
Olga, WA 98279-0055



Dec 9, 2011

Chairman Cliff Judkins

Alaska Board of Game, Alaska Dept. of Fish and Game, Beard Supports
Section, P.O. Box 115526
Juneau, AK 99811-5526

Dear Chairman Judkins,

Please cooperate with federal land managers, especially National Park Service lands, so that federal-state conflicts do not increase regarding wildlife management. The wildlife in NPS areas, including the National Preserves, should be managed for ecosystem function, natural fluctuations in all populations, and not managed to prefer certain species over others.

Alaska's national parks and preserves attract visitors from around the world for opportunities including seeing wildlife such as bears and wolves. I believe that wildlife living on lands managed by the National Park Service should be exempt from certain state of Alaska hunting regulations. The Park Service is charged by Congress to protect natural and healthy wildlife populations. It is prohibited from manipulating one wildlife population for the benefit of another (i.e. increasing the harvest of wolves and bears to benefit moose and caribou). The state of Alaska, on the other hand, is charged with maximizing wildlife for human consumption. Obviously, there is a conflict between these two different ways of managing wildlife.

Over the years, the state of Alaska has adopted hunting regulations that both encourage a higher harvest of and/or make it easier to kill wolves and bears. National Park Service lands should be exempt from these regulations. I support and urge you to support the following seven proposals which will be considered at the January 2012 meeting in Anchorage:

Proposal 48: exempt NPS lands from allowing game meat to be purchased and sold

Proposal 93: exempt NPS lands from state regulation allowing trapping with a gun

Proposal 94: exempt NPS lands from wolf trapping seasons that extend into months when pups are born

Proposal 97: exempt NPS lands from the use of artificial light (spotlighting) to kill bears in dens

Proposal 109: exempt NPS lands from killing bear cubs and sows with cubs

Proposal 121: exempt NPS lands from bear baiting or the use of scent lures

Proposal 126: exempt NPS lands from trapping of black bears

Thank you.

Sincerely,

Mr. Richard L. Anderson
2321 Legacy Dr
Anchorage, AK 99516-2643
(907) 522-0202



Dec 16, 2011

Chairman Cliff Judkins

Alaska Board of Game, Alaska Dept. of Fish and Game, Beard Supports
Section, P.O. Box 115526
Juneau, AK 99811-5526

Dear Chairman Judkins,

I am sad to see such threats to our wildlife treasures. We must protect these living treasures for the future. We have already, by our own actions, pushed animals and plants to extinction. I believe that we can make more money by preserving animals and the access to see and photograph them than we can by killing them. I hope some leaders in these issues realizes this, and protects our wolves and bears. Alaska's national parks and preserves attract visitors from around the world for opportunities including seeing wildlife such as bears and wolves. I believe that wildlife living on lands managed by the National Park Service should be exempt from certain state of Alaska hunting regulations. The Park Service is charged by Congress to protect natural and healthy wildlife populations. It is prohibited from manipulating one wildlife population for the benefit of another (i.e. increasing the harvest of wolves and bears to benefit moose and caribou). The state of Alaska, on the other hand, is charged with maximizing wildlife for human consumption. Obviously, there is a conflict between these two different ways of managing wildlife.

Over the years, the state of Alaska has adopted hunting regulations that both encourage a higher harvest of and/or make it easier to kill wolves and bears. National Park Service lands should be exempt from those regulations. I support and urge you to support the following seven proposals which will be considered at the January 2012 meeting in Anchorage:

Proposal 48: exempt NPS lands from allowing game meat to be purchased and sold

Proposal 93: exempt NPS lands from state regulation allowing trapping with a gun

Proposal 94: exempt NPS lands from wolf trapping seasons that extend into months when pups are born

Proposal 97: exempt NPS lands from the use of artificial light (spotlighting) to kill bears in dens

Proposal 109: exempt NPS lands from killing bear cubs and sows with cubs

Proposal 121: exempt NPS lands from bear baiting or the use of scent lures

Proposal 126: exempt NPS lands from trapping of black bears

Thank you.

Sincerely,

Mrs. Lisette Root
PO Box 88
O Brien, OR 97534-0088



Dec 16, 2011

Chairman Cliff Judkins

Alaska Board of Game, Alaska Dept. of Fish and Game, Beard Supports
Section, P.O. Box 115526
Juneau, AK 99811-5526

Dear Chairman Judkins,

As one who has visited Alaska for its magnificent landscapes, wildlife and history, I ask you take into account Alaska visitor perceptions when designing your hunting regulations. You are blessed with a wealth of diverse wildlife in your parks and preserves that draws tourists from all over the world. Bears and wolves are a huge draw. They maintain ecological integrity and balance.

Those lands managed by the National Park Service should be exempt from certain state of Alaska hunting regulations. The Park Service is charged by Congress to protect natural and healthy wildlife populations. It is prohibited from manipulating one wildlife population for the benefit of another (i.e. increasing the harvest of wolves and bears to benefit moose and caribou). The state of Alaska, on the other hand, is charged with maximizing wildlife for human consumption. Obviously, there is a conflict between these two different ways of managing wildlife.

Over the years, the state of Alaska has adopted hunting regulations that both encourage a higher harvest of and/or make it easier to kill wolves and bears. National Park Service lands should be exempt from those regulations. I support and urge you to support the following seven proposals which will be considered at the January 2012 meeting in Anchorage:

Proposal 48: exempt NPS lands from allowing game meat to be purchased and sold

Proposal 93: exempt NPS lands from state regulation allowing trapping with a gun

Proposal 94: exempt NPS lands from wolf trapping seasons that extend into months when pups are born

Proposal 97: exempt NPS lands from the use of artificial light (spotlighting) to kill bears in dens

Proposal 109: exempt NPS lands from killing bear cubs and sows with cubs

Proposal 121: exempt NPS lands from bear baiting or the use of scent lures

Proposal 126: exempt NPS lands from trapping of black bears

Alaska will gain lots of goodwill by agreeing to these proposals. I know I will be more likely to visit Alaska again if I know you are following ethical and scientific processes in your wildlife management.

Thank you.

Sincerely,

Ms. Gail Richardson
5263 Cimmeron Dr
Bozeman, MT 59715-8756
(406) 685-7206



Dec 16, 2011

Chairman Cliff Judkins

Alaska Board of Game, Alaska Dept. of Fish and Game, Beard Supports
Section, P.O. Box 115526
Juneau, AK 99811-5526

Dear Chairman Judkins,

Alaska's national parks and preserves attract visitors from around the world for opportunities including seeing wildlife such as bears and wolves. I believe that wildlife living on lands managed by the National Park Service should be exempt from certain state of Alaska hunting regulations. The Park Service is charged by Congress to protect natural and healthy wildlife populations. It is prohibited from manipulating one wildlife population for the benefit of another (i.e. increasing the harvest of wolves and bears to benefit moose and caribou). The state of Alaska, on the other hand, is charged with maximizing wildlife for human consumption. Obviously, there is a conflict between these two different ways of managing wildlife.

In this era of increased environmental consciousness, it is both irresponsible and absurd to continue policies favoring the whims and fancies of big-game hunters. What we should seek instead is balance and variety among species. We should manage wildlife for the long-term survival of species diversity. Policies biased toward increasing big-game populations clearly conflict with the concept of survival of ecosystems.

Over the years, the state of Alaska has adopted hunting regulations that both encourage a higher harvest of and/or make it easier to kill wolves and bears. National Park Service lands should be exempt from these regulations. I support and urge you to support the following seven proposals which will be considered at the January 2012 meeting in Anchorage:

Proposal 48: exempt NPS lands from allowing game meat to be purchased and sold

Proposal 93: exempt NPS lands from state regulation allowing trapping with a gun

Proposal 94: exempt NPS lands from wolf trapping seasons that extend into months when pups are born

Proposal 97: exempt NPS lands from the use of artificial light (spotlighting) to kill bears in dens

Proposal 109: exempt NPS lands from killing bear cubs and sows with cubs

Proposal 121: exempt NPS lands from bear baiting or the use of scent lures

Proposal 126: exempt NPS lands from trapping of black bears

Thank you.

Sincerely,

Dr. Randall Gloege
343 N Rim Rd
Billings, MT 59102-1016
(406) 248-8161



Dec 16, 2011

Chairman Cliff Judkins

Alaska Board of Game, Alaska Dept. of Fish and Game, Beard Supports
Section, P.O. Box 115526
Juneau, AK 99811-5526

Dear Chairman Judkins,

It is unbelievable that hunting wolves and bears by means used to bait and snare in Alaska's National Parks is even considered. This is meant to be a sanctuary for these animals. Removing them to make way for expanding hunting of other animals is beyond greed. It always comes down to money. I'm sure a hefty price would be paid to hunt caribou and other like animals. The judgement of a society can be found in the way it treats its animals----Ghandi. Alaska's national parks and preserves attract visitors from around the world for opportunities including seeing wildlife such as bears and wolves. I believe that wildlife living on lands managed by the National Park Service should be exempt from certain state of Alaska hunting regulations. The Park Service is charged by Congress to protect natural and healthy wildlife populations. It is prohibited from manipulating one wildlife population for the benefit of another (i.e. increasing the harvest of wolves and bears to benefit moose and caribou). The state of Alaska, on the other hand, is charged with maximizing wildlife for human consumption. Obviously, there is a conflict between these two different ways of managing wildlife.

Over the years, the state of Alaska has adopted hunting regulations that both encourage a higher harvest of and/or make it easier to kill wolves and bears. National Park Service lands should be exempt from those regulations. I support and urge you to support the following seven proposals which will be considered at the January 2012 meeting in Anchorage:

Proposal 48: exempt NFS lands from allowing game meat to be purchased and sold

Proposal 93: exempt NFS lands from state regulation allowing trapping with a gun

Proposal 94: exempt NFS lands from wolf trapping seasons that extend into months when pups are born

Proposal 97: exempt NFS lands from the use of artificial light (spotlighting) to kill bears in dens

Proposal 109: exempt NPS lands from killing bear cubs and sows with cubs

Proposal 121: exempt NPS lands from bear baiting or the use of scent lures

Proposal 126: exempt NPS lands from trapping of black bears

Thank you.

Sincerely,

Ms. Dori Demarbieax
2730 Indep. Highway
Independence, OR 97351



Dec 10, 2011

Chairman Cliff Judkins

Alaska Board of Game, Alaska Dept. of Fish and Game, Beard Supports
Section, P.O. Box 115526
Juneau, AK 99811-5526

Dear Chairman Judkins,

Alaska's national parks and preserves attract visitors from around the world for opportunities including seeing wildlife such as bears and wolves. I believe that wildlife living on lands managed by the National Park Service should be exempt from certain state of Alaska hunting regulations. The Park Service is charged by Congress to protect natural and healthy wildlife populations. It is prohibited from manipulating one wildlife population for the benefit of another (i.e. increasing the harvest of wolves and bears to benefit moose and caribou). The state of Alaska, on the other hand, is charged with maximizing wildlife for human consumption. Obviously, there is a conflict between these two different ways of managing wildlife.

Over the years, the state of Alaska has adopted hunting regulations that both encourage a higher harvest of and/or make it easier to kill wolves and bears. National Park Service lands should be exempt from those regulations. I support and urge you to support the following seven proposals which will be considered at the January 2012 meeting in Anchorage:

Proposal 48: exempt NPS lands from allowing game meat to be purchased and sold

Proposal 93: exempt NPS lands from state regulation allowing trapping with a gun

Proposal 94: exempt NPS lands from wolf trapping seasons that extend into months when pups are born

Proposal 97: exempt NPS lands from the use of artificial light (spotlighting) to kill bears in dens

Proposal 109: exempt NPS lands from killing bear cubs and sows with cubs

Proposal 121: exempt NPS lands from bear baiting or the use of scent lures

Proposal 126: exempt NPS lands from trapping of black bears

Alaska and Alaskans should be better than this. Many of the hunting practices discussed are simply gratuitously painful to the animals in question. Ever since then Governor Sarah Palin stood giggling in front of a turkey being slowly and painfully slaughtered, Alaskans have had to live with a reputation of not caring about the suffering of animals. Please do something about it and convince the rest of America that your reputation is not deserved.

Thank you.

Sincerely,

Mr. Nels Kelstrom
6253 Spinnaker Ridge Ln
Clinton, WA 98336-9546



Dec 8, 2011

Chairman Cliff Judkins

Alaska Board of Game, Alaska Dept. of Fish and Game, Beard Supports
Section, P.O. Box 115526
Juneau, AK 99811-5526

Dear Chairman Judkins,

Our experience with top predators in the Northern Rockies (e.g., wolves) proves that ecosystem health demands that the top predators be left alone. There's a reason it's called "hunting." You ain't supposed to waltz out of your tent with a hangover and blow away a trophy ungulate before you have your morning coffee. I am a hunter, bow and black powder. I value the experience as much as the meat. Please do not let Alaska override good science in the pursuit of the almighty dollar on land you manage.

Alaska's national parks and preserves attract visitors from around the world for opportunities including seeing wildlife such as bears and wolves. I believe that wildlife living on lands managed by the National Park Service should be exempt from certain state of Alaska hunting regulations. The Park Service is charged by Congress to protect natural and healthy wildlife populations. It is prohibited from manipulating one wildlife population for the benefit of another (i.e. increasing the harvest of wolves and bears to benefit moose and caribou). The state of Alaska, on the other hand, is charged with maximizing wildlife for human consumption. Obviously, there is a conflict between these two different ways of managing wildlife.

Over the years, the state of Alaska has adopted hunting regulations that both encourage a higher harvest of and/or make it easier to kill wolves and bears. National Park Service lands should be exempt from those regulations. I support and urge you to support the following seven proposals which will be considered at the January 2012 meeting in Anchorage:

Proposal 48: exempt NPS lands from allowing game meat to be purchased and sold

Proposal 93: exempt NPS lands from state regulation allowing trapping with a gun

Proposal 94: exempt NPS lands from wolf trapping seasons that extend into months when pups are born

Proposal 97: exempt NPS lands from the use of artificial light (spotlighting) to kill bears in dens

Proposal 109: exempt NPS lands from killing bear cubs and sows with cubs

Proposal 121: exempt NPS lands from bear baiting or the use of scent lures

Proposal 126: exempt NPS lands from trapping of black bears

Thank you.

Sincerely,

Mr. H McFadden
720 Haggerty Ln
Unit 203
Bozeman, MT 59715-2407
(406) 599-6669



Dec 9, 2011

Chairman Cliff Judkins

Alaska Board of Game, Alaska Dept. of Fish and Game, Beard Supports
Section, P.O. Box 115526
Juneau, AK 99811-5526

Dear Chairman Judkins,

Our future as a species is irreversibly tied to the ecosystems we co-inhabit. If we truly desire to strive for sustainability, continued technological advancement, and a society built on knowledge, logic, and sense, we must do everything we can to protect our wild spaces. Their value in the areas of inspiration, innovation, spirituality and world processes we all depend on is incontrovertible. It goes beyond mere civic or economic duty: we are the guardians of this planet and if we do not do our job and sow nothing but destruction and filth, that is all we will sow.

Alaska's national parks and preserves attract visitors from around the world for opportunities including seeing wildlife such as bears and wolves. I believe that wildlife living on lands managed by the National Park Service should be exempt from certain state of Alaska hunting regulations. The Park Service is charged by Congress to protect natural and healthy wildlife populations. It is prohibited from manipulating one wildlife population for the benefit of another (i.e. increasing the harvest of wolves and bears to benefit moose and caribou). The state of Alaska, on the other hand, is charged with maximizing wildlife for human consumption. Obviously, there is a conflict between these two different ways of managing wildlife.

Over the years, the state of Alaska has adopted hunting regulations that both encourage a higher harvest of and/or make it easier to kill wolves and bears. National Park Service lands should be exempt from those regulations. I support and urge you to support the following seven proposals which will be considered at the January 2012 meeting in Anchorage:

Proposal 48: exempt NPS lands from allowing game meat to be purchased and sold

Proposal 93: exempt NPS lands from state regulation allowing trapping with a gun

Proposal 94: exempt NPS lands from wolf trapping seasons that extend into months when pups are born

Proposal 97: exempt NPS lands from the use of artificial light (spotlighting) to kill bears in dens

Proposal 109: exempt NPS lands from killing bear cubs and sows with cubs

Proposal 121: exempt NPS lands from bear baiting or the use of scent lures

Proposal 126: exempt NPS lands from trapping of black bears

Thank you.

Sincerely,

Ms. Cienna Simmons
1060 Centennial Blvd
Springfield, OR 97477-3250



Dec 9, 2011

Chairman Cliff Judkins

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

Dear Chairman Judkins,

When I go to Alaska, I expect to see the wildlife in the National Parks and associated areas in their natural state. Bears and wolves are a very important part of that experience. It pains me very much that these animals are being hunted in the National Parks, and I think it should be stopped. Furthermore, I think most tourists agree with me; and when they find that this is happening, they will be as upset with it as I am.

Alaska's national parks and preserves attract visitors from around the world for opportunities including seeing wildlife such as bears and wolves. I believe that wildlife living on lands managed by the National Park Service should be exempt from certain state of Alaska hunting regulations.

The Park Service is charged by Congress to protect natural and healthy wildlife populations. It is prohibited from manipulating one wildlife population for the benefit of another (i.e. increasing the harvest of wolves and bears to benefit moose and caribou).

Over the years, the state of Alaska has adopted hunting regulations that encourage killing wolves and bears. National Park Service lands should be exempt from those regulations. Please support the following seven proposals which will be considered at the January 2012 meeting in Anchorage: Proposals 48, 93, 94,97, 109, 121, and 126.

Thank you for considering my comments.

Sincerely,

Mr. James Boone
15633 NW Saint Andrews Dr
Portland, OR 97229-7820
(503) 645-3181



Dec 9, 2011

Chairman Cliff Judkins

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

Dear Chairman Judkins,

I believe that wildlife living on lands managed by the National Park Service should be exempt from certain state of Alaska hunting regulations. The Park Service is charged by Congress to protect natural and healthy wildlife populations. It is prohibited from manipulating one wildlife population for the benefit of another. The state of Alaska, on the other hand, is charged with maximizing wildlife for human consumption. Obviously, there is a conflict between these two different ways of managing wildlife.

Over the years, the state of Alaska has adopted hunting regulations that both encourage a higher harvest of and/or make it easier to kill wolves and bears. National Park Service lands should be exempt from those regulations. I support and urge you to support the following seven proposals which will be considered at the January 2012 meeting in Anchorage:

Proposal 48: exempt NPS lands from allowing game meat to be purchased and sold

Proposal 93: exempt NPS lands from state regulation allowing trapping with a gun

Proposal 94: exempt NPS lands from wolf trapping seasons that extend into months when pups are born

Proposal 97: exempt NPS lands from the use of artificial light (spotlighting) to kill bears in dens

Proposal 109: exempt NPS lands from killing bear cubs and sows with cubs

Proposal 121: exempt NPS lands from bear baiting or the use of scent lures

Proposal 126: exempt NPS lands from trapping of black bears

Thank you.

Sincerely,

Mrs. Elizabeth Bloom
1821 S 7th St W
Missoula, MT 59801-3319
(406) 982-3358



Dec 10, 2011

Chairman Cliff Judkins

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

Dear Chairman Judkins,

Nancy and I think wildlife living on lands managed by the National Park Service should be exempt from certain state of Alaska hunting regulations. The Park Service is charged by Congress to protect natural and healthy wildlife populations. It is prohibited from manipulating one wildlife population for the benefit of another (i.e. increasing the harvest of wolves and bears to benefit moose and caribou). The state of Alaska, on the other hand, is charged with maximizing wildlife for human consumption. Obviously, there is a conflict between these two different ways of managing wildlife.

Over the years, the state of Alaska has adopted hunting regulations that both encourage a higher harvest of and/or make it easier to kill wolves and bears. National Park Service lands should be exempt from those regulations. I support and urge you to support the following seven proposals which will be considered at the January 2012 meeting in Anchorage:

Proposal 48: exempt NPS lands from allowing game meat to be purchased and sold

Proposal 93: exempt NPS lands from state regulation allowing trapping with a gun

Proposal 94: exempt NPS lands from wolf trapping seasons that extend into months when pups are born

Proposal 97: exempt NPS lands from the use of artificial light (spotlighting) to kill bears in dens

Proposal 109: exempt NPS lands from killing bear cubs and sows with cubs

Proposal 121: exempt NPS lands from bear baiting or the use of scent lures

Proposal 126: exempt NPS lands from trapping of black bears

Thank you.

Sincerely,

Mr. John Woolley, President
1606 E Sequim Bay Rd
Sequim, WA 98382-7649
(360) 683-0724



RECEIVED
DEC 27 2011
BOARDS
ANCHORAGE

Dear Game Board Members,

My name is Don Hunley, I have been and avid hunter for 41 years, an assistant hunting guide in Alaska for the last 12 years. I have practiced falconry for 24 years and have been the Northern Director for the national falconry organization, the North American Falconers Association (NAFA). I am currently the Southern Region Vice President for the Alaska Falconers Association.

R06
Statewide 2012
Public
Comment

Thank you for the opportunity to comment on two falconry proposals before you. The Alaska Falconers Association version is #38. The States version is #39.

Board members, please keep in mind as you review my letter, those of others, and the proposals themselves; falconry is a heavily regulated sport at both the federal and state level, that all entities have agreed: falconry has no biological impact on any level. Not the raptors we take nor the quarry we hunt.

I would request that you would consider using the AFA's version of the new regulations as a baseline for the new falconry regulations for several reasons.

1. Ours is much closer to the federal version, which was vetted and commented on by falconers and regulators over for several years. Our version has also been approved by the Chief of the Permits and Regulations Branch of the U.S. Fish and Wildlife Service's Division of Migratory Bird Management as meeting the minimum standards set by the new federal regulations. USFWS approval is required for falconry to remain legal in Alaska.
2. The AFA version has been written, reviewed, corrected, rewritten, etc. nine times over the course of the past two years, with considerable collaboration and discussion with the Alaska Department of Fish and Game. It was also submitted on time (April 2011). The department's version was hastily put together without consulting the falconry community and turned in very late (December 2011). The department's version has multiple errors, including many typographical errors and provisional errors that falconers, as a user group, would unfortunately have to live under if made into regulation. I would suggest (although a technicality) that possibly the State version should not even be a legitimate proposal since they put it in at such a late date. Surely the AFA would not have been granted an opportunity for a proposal if we had missed the deadline by such a large margin.
3. The AFA version enables Alaskans to practice falconry freely yet with appropriate restrictions to protect the birds we use. The department's version is more restrictive, may not meet the federal regulations appropriately (the AFA proposal has been approved by the USFWS), and requires more paperwork and administrative manpower from the state.

P183



I find this ironic from a game dept. that complains that it already does not have the resources to monitor us. The AFA's version would streamline the states time and effort required to regulate falconers. As a case in point, falconers must file a report any time a raptor is acquired, transferred, lost, or if a bird dies. When hand delivering a take form 3-186A to a department biologist (who shall remain nameless), he/she complained to me about how he/she manages all the moose hunters in southeast Alaska with less time and effort that it takes him/her to manage the falconers in their region. My response was, "you guys require all this stuff of us, I would rather not jump through all these hoops." "Point taken", was the reply I received.

4. Our version would save you, the Game Board, time. There are so many regulations we as falconers have to follow already and to inform the AK Board of Game of them, plus differences between the department's version and the AFA's, and why it would be beneficial to change the regs. that have already been appropriately corrected and vetted at a federal level, would be extremely time consuming for the Board, the department, and the falconers of Alaska.

Board members, please understand, WE are the user group that brought the Peregrine falcon back from the brink of extinction, not scientists, not game departments... falconers. We provided the birds, and bred them and fed them and hacked them back into the wild. Why? Because we love the sport so much that we are willing to jump through all the hoops, all the paperwork, mentoring, buying equipment etc. to finally get our hawks and be able to fly and hunt with them. WE as a user group want the best for the resource (the hawks) and the regulations we have put forth put the hawks first and primarily and most importantly: we don't even matter BIOLOGICALLY!

We take so few birds and relatively little game with them that we as a sporting group have ZERO biological impact. We just don't matter. The department readily recognizes this, so why all the efforts to regulate a sport that biologically does not matter? We could take all the hawks/falcons we want, any time we want, catch all the game we could, without any seasons and still not manage to have any impact at all on the raptors we use or the game that we hunt. That ladies and gentlemen is the real point I would like to get across to you, we simply would like to fly our hawks with some freedom and enjoy our sport to its fullest. If hunters of moose, caribou, sheep, bear, or almost any game species had to jump through regulatory hoops like the falconers do to practice their sport. I assure you there would not be many people buying hunting licenses this next hunting season.

Finally, I would ask you again to please support the AFA version of the new falconry regulations, Proposal No. 38. Thank you for taking the time to read this. I look forward to meeting you at the January meeting and would appreciate any opportunity to respond to your questions so that I could answer and help clarify your understanding of our sport;

PZ03



Sincerely
Don Hunley



(907) 350-9172

P 383



ATTN: Board of Game Comments

Alaska Department of Fish and Game

Boards Support Section

I am a Master Class Falconer, I have lived in Alaska for 27 years, I am NOT in support of Proposal #40 submitted by a group called American Falconry Conservancy.

How can a NON-Resident be able to harvest a falconry bird and leave the State, when an Alaskan falconer can't move out of the state until he/she has had the raptor for 365 days in hand! So if an Alaskan falconer gets transferred out of the state before the 365 days is up the falconer has to give up the bird. Plus an Alaskan falconer can't move out of the State with breeding birds at ALL!!

Alaska is not the only State that doesn't allow Non-Residents to harvest falconry birds; we can wait and see what other states are doing before we let it go.

Alaska Falconers Association and Alaska Department of Fish and Game already have a lot to ask from the Board of Game. Alaska Department of Fish and Game didn't add a stipulation for a Non-Resident take in their copy of the new Falconry Manual.

Let AFC wait and see what comes out of this meeting and then, they can discuss with Alaska Department of Fish and Game and Alaska Falconers Association, to get something we all can agree with.



But if the board sees fit that the State should allow having a Non-Resident take. I would like the Board to consider adding some of these rules.

A) I would recommend that GMU's 10,21,23,24 would be added to a list of GMU's that NON-Resident falconers are NOT ALLOWED to harvest falconry birds from.

B) NON-Resident falconers should not be allowed to harvest raptors within 5 miles of Alaska's Highway system.

C) I would like to recommend that NON-Resident falconers are allowed to harvest one of each species.

D) NON-Resident Permit fee of at least 2000.00 to 3500.00\$ should be in place, this way the Department can use the money for cost.

E) Only Master Class falconers should be eligible for a NON-Resident Permit.

F) Game Board Hearings for Non-resident falconry be heard every 8 years, instead of every four years.

Thank you for your time.



Dale R Hall

Soldotna, Alaska.99669



Dan Marshall
PO Box 976
Seward, AK 99664
907-224-8445

I am writing in opposition of: Proposal 102-5 AAC 92.085 "Prohibit the use of pack animals other than horses while sheep or goat hunting"

After reviewing the proposal and researching the science, I have concluded that even if this represented an authentic detriment to our sheep and goat populations in Alaska, the culminating events that would need to coincide in order that this catastrophe scenario might possibly play out is so remote, that any reasonable biologist would disregard the idea of it ever occurring in Alaska where we do not have open range grazing of livestock, whether it would be sheep or cattle.

In a most recent study conducted by John D. Wehausen, Scott T. Kelly, and Rob R. Ramey II at the University of California, White Mountain Research Station, on the topic of *Domestic sheep, bighorn sheep, and respiratory disease: a review of the experimental evidence*, they have concluded that although wild sheep have died in the lower 48 from contact with domestic livestock, primarily sheep, there have been no cases in Alaska or Northern British Columbia, and this is due to the fact that there is not any livestock grazing on public lands where wild sheep and domestic sheep would have contact. Pen studies with Bighorn sheep and domestic sheep have concluded that *with contact* of infected animals, the penned Bighorn sheep died of pneumonia. When penned with other animals, elk, mule deer, llamas, cattle, some died, and some didn't. Historically Sheep populations in the lower 48 experienced widespread die-offs from pneumonia without contact with grazing livestock.

Sheep in general are susceptible to pneumonia, and bighorn sheep appear particularly susceptible to this disease, exhibiting periodic pneumonia die-offs in the Rocky Mountain region (Buechner 1960, Stelfox 1971). While some of these epizootics can be traced to contact with domestic sheep and subsequent inter-population migration of pathogens within metapopulations (Goodson 1982, Onderka and Wishart 1984, George et al. 2008), there is a large literature that we do not review documenting pneumonia outbreaks and die offs in bighorn sheep populations with no known recent prior contact with domestic sheep (Goodson 1982, Martin et al. 1996). Researchers typically have attributed these latter pneumonia outbreaks to various environmental conditions likely to predispose wild sheep to respiratory disease (Festa-Bianchet 1988, Monello et al. 2001)

The study goes on to say that in Alaska and Northern Canada, the wild sheep populations have not experienced this effect. The point here is that we are not talking about grazing domestic sheep. We are talking about a handful of pack llamas in the entire state of Alaska.

Montgomery's proposal states that if left unchecked, more and more people will be packing with goats and llamas. Montgomery has not done his research. Someone wanting to get into llama packing would be hard pressed to find a pack llama for sale in the State of Alaska. I can hike and climb 300 miles (normal summer mileage) a summer in the Kenai Range and never see another pack llama. Getting llamas through Canada is no longer possible and flying llamas to Alaska is absolutely cost prohibitive. There are no breeders actively in business and the hand full of us that actually use llamas in the mountains are not producing. Of my five llamas, all but one is gelded. Llama packing is not going to become the new rage for sheep and goat hunters.



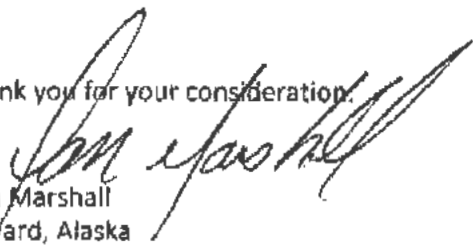
I have packed for fifteen years in Alaska. I have conducted business as *Llamtrek Alaska*, and now only do summer work for the Chugack National Forest as an independent contractor. I have hunted the Kenai Mountains extensively with llamas. I have never had a goat or a sheep walk up to a llama and check it out. In fact, in fifteen years I haven't had a sheep or a goat within 200 yards of my llamas. A few pack llamas are not a herd of free range cattle or a flock of domestic sheep left to roam the mountain pastures on BLM or FS land. Even if, on the outside chance, one of my llamas carried the pneumonia parasite, I cannot reasonably or logically foresee a scenario where a goat or sheep would walk into my camp and make contact with one of my packers. The only negative experience I have had with my pack llamas has been with an airplane outfitter that was somewhat chagrined that I was able to access areas with my llamas that only planes could access previously. Horses could not get there either. Was this a problem? I don't know. I shot one sheep and went home.

In the 80's, there was a viable and active llama industry in Alaska, most of the farms located in the MatSu Valley. Those farms are now all but gone. But for thirty plus years, llamas have been packing in sheep and goat country all over the state, and we want to be cautious about implementing a law loosely based on an association between domestic grazing sheep in the lower 48 and Bighorn population issues. There have not been any biological issues in Alaska with llamas and sheep or goats.

My wife is a breast cancer survivor and after four surgeries, and the complete removal of both breasts, she can no longer shoulder a pack. If this proposal were to pass, she will forever be excluded from hunting goats or sheep. We cannot afford the outfitters, guides and planes. I am assuming that Daniel Montgomery is in the business of flying for sheep and goats and he knows the cost involved. My wife would just be another Alaska relegated to non-user status because of her physical circumstances and our economics. Llamas represent her only access to the high mountain places here on the Kenai Peninsula. If this proposal were to pass, we will no longer be able to walk up the Lost Lake Trail, and hunt goats on Mount Ascension. Now, we can go up there with our llamas. We just can't hunt goats. We can hunt bears, but not goats. Is this misguided proposal accomplishing anything except removing another Alaskan from the resource?

Please do not give serious credence to this proposal. The studies from the lower 48 are referring to domestic heard animals left loose on public lands to roam and interact. Llamas (camalids) are not sheep and are not loose, ever. This of course is assuming that one my five llamas is a carrier of the particular parasite which according to the studies is suspect at best. They are a valuable, highly low impact pack animal that is perfect for Alaska. Their padded feet leave little trace, and are browsers. They can eat Devil's Club and like it. They are valued by our local public agencies, and they are the perfect hiking companions in the mountains. Llamas will still be in the mountains. The only change would be that you would essentially eliminate another Alaskan resource user. Is this what we want to accomplish?

Thank you for your consideration.


Dan Marshall
Seward, Alaska
907-224-8445
dmarshall@kpbsd.k12.ak.us





12/20/2011

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

RE: Statewide Regulations Cycle B Proposal Comments

Dear Board Members:

I am an Alaskan resident hunter who is concerned about our game management in Alaska. I am unable to attend the January 13-18, 2012 meeting in Anchorage. Please accept my written comments as noted below.

Sincerely,

Perry Schneider
1223 2nd Ave
Fairbanks, AK 99701

PROPOSAL 78 - 5 AAC 85.055- OPPOSE

Lengthening the Sheep season for residents will do nothing to help the Sheep population. The non-resident/guide situation needs to be dealt with.

PROPOSAL 80 - 5 AAC 85.055 - SUPPORT AS AMMENDED

Lengthening the Sheep season for residents will do nothing to help the Sheep population. The non-resident/guide situation needs to be dealt with and by going to Draw only for non-residents such as Proposal 88 would be a solution.

PROPOSAL 81 - 5 AAC 85.055- OPPOSE

Lengthening the Sheep season for residents will do nothing to help the Sheep population. The non-resident/guide situation needs to be dealt with.

PROPOSAL 82 - 5 AAC 85.055- OPPOSE

Lengthening the Sheep season for residents will do nothing to help the Sheep population. The non-resident/guide situation needs to be dealt with.

PROPOSAL 83 - 5 AAC 85.055 - OPPOSE

Lengthening the Sheep season for residents will do nothing to help the Sheep population. The non-resident/guide situation needs to be dealt with.





PROPOSAL 84 - 5 AAC 85.055 - OPPOSE

Lengthening the Sheep season for residents will do nothing to help the Sheep population. The non-resident/guide situation needs to be dealt with.

PROPOSAL 85 - 5 AAC 85.055 - OPPOSE

Lengthening the Sheep season for residents will do nothing to help the Sheep population. The non-resident/guide situation needs to be dealt with.

PROPOSAL 86 - 5 AAC 85.055 - OPPOSE

Lengthening the Sheep season for residents will do nothing to help the Sheep population. The non-resident/guide situation needs to be dealt with. By allowing Youth to hunt early opens the door for others that the youth to be the one actually pulling the trigger.

PROPOSAL 87 - 5 AAC, Chapter 8. - SUPPORT AS AMMENDED

I support this proposal in that it aligns with the State of Alaskas mandate that Fish and Wildlife resources are to be managed for the people of Alaska. 5% may be too low of a percentage.

PROPOSAL 88 - 5 AAC, Chapter 85. - SUPPORT

I support this proposal in that it aligns with the State of Alaskas mandate that Fish and Wildlife resources are to be managed for the people of Alaska. As is stands now, the State sells an UNLIMITED number of Sheep Tags to non-resident hunters. Most draw hunts like TMA and DCUA are overwhelmed with applicants to the point where it is almost impossible for an Alaskan resident to get drawn. This has also resulted in driving the guide industry to the point of declining Sheep numbers resulting in several areas being converted to draw only over the past few years. Not to mention guide/private citizen conflicts in the field.

PROPOSAL 89 - 5 AAC 85.055- OPPOSE

Alaskan residents should ALWAYS have the right and opportunity to hunt Dall sheep on a harvest ticket. Going to draw only strips Alaskans of this right.

PROPOSAL 90 - 5 AAC, Chapter 8. - SUPPORT AS AMMENDED

I support this proposal in that it aligns with the State of Alaskas mandate that Fish and Wildlife resources are to be managed for the people of Alaska. 2% may be too low of a percentage.

PROPOSAL 91 - 5 AAC, Chapter 8. -- OPPOSE

Non-resident next of kin is still a non-resident.



Personal Comments: Tad Fujioka

Dec 18 2011

Proposals: 62 & 63 Opposed; 64 & 65 Support; 66-68 Support; 69 Oppose; 239-240: comment

Note: I am the chairman and trapping representative of the Sitka AC, but these comments are my own, not official AC positions.

62-63 Increase the number of hunts that one can apply for from 3 per species to 5 or 6: I am opposed to this change as the current system keeps the number of applicants down to a reasonable level. If people could apply for more hunts the odds of drawing a permit would get even longer. As it is there, fortunately there are still some of the less competitive drawings where there is still a reasonably good chance to get drawn. If getting a tag is a high priority for you, you can apply for these hunts rather than just the three most desirable hunts. If the number of hunts that a hunter is allowed to apply for goes up, these hunts with high drawing success rates will no longer exist.

64-65 Limit the number of drawing permits that a hunter can win to 2 per year: It is reasonable to "share the wealth" of highly desirable hunting opportunities. The opportunity to hunt will be more valued if it is a special hunt, rather than if it is the third or fourth of the season.

66-68 Limit non-residents to 10% of drawing hunts: I favor these proposals, as the drawing hunts are precisely those hunts where the hunter demand is higher than the game population can withstand. In situations where we don't have enough game to go around to completely satisfy even the Alaskan hunters, we should not be spreading the resource even thinner by allowing many to go to non-residents. I recognize that some of the non-resident hunters hire resident guide services, so that there is some benefit to Alaskans from non-resident hunters. However, the BOG should not put these trophy hunting clients where they are taking meat off of Alaskan tables. Fortunately Alaska still has many underutilized game herds where trophy hunting would be acceptable and worth encouraging. I understand that these areas are generally underutilized specifically because they are relatively remote, but it is far more reasonable to ask that a guided non-resident pay the air charter fee to access the area than require a local resident to hunt that area because his or her tag for the local hunt went to an out-of-state hunter.

69- Bonus Point System for Drawing Hunts: I am very strongly opposed to this proposal to establish a Bonus Point system for drawing hunts. This proposal would give a large advantage to those hunters with the financial resources to apply for hunts year in and year out. While some Alaskan residents have the luxury of being able to consider the drawing application fees inconsequential, this is not true for all resident hunters- and certainly not every year, since Alaska is a state with a high level of self-employment and even the established employers are subject to boom-and-bust business cycles. This proposal would generally favor non-residents hunters over residents, and urban residents over rural residents since in each comparison the former tends to be wealthier. By highly favoring applicants who apply every year, the proposal strongly encourages hunters to apply even in years when they may not be able to most fully benefit from getting drawn. (I.e. when injured or when other commitments squeeze their schedule). Hunters who under the current system may opt to not apply until they can take full advantage of their hunting opportunity will feel obligated to apply to retain their point advantage. Any increase in the number of applicants further dilutes the chances that any one individual has of getting drawn. If we want to see more of these highly-sought-after tags being drawn by long-time Alaskan hunters, we should try to discourage non-resident hunters and casual hunters from applying, rather than supporting this proposal which will increase the number of non-resident applications, thus diluting



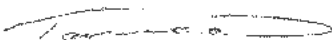
our own odds. in the long run, Alaskans are better off under the current system than under a bonus point system.

Furthermore, if passed, this proposal would particularly disadvantage today's youngest hunters. Those not yet of age to apply for drawing hunts would be forced to wait while other hunters begin to accumulate bonus points. Once finally old enough to apply, their odds would be exponentially longer than most of the rest of the applicants. If these younger hunters decide to go to college out of state during the hunting season, for several years they will have to again be forced to handicap themselves in future drawings. Please abandon this proposal and avoid putting today's young hunters in this situation.

239-240- Antlerless moose hunts in Berners Bay (239) and Gustavus (240): I support the Dept in desiring to retain the potential for antlerless moose hunts in the Berner's Bay & Gustavus areas if appropriate. However, I question the need to authorize as many as 30 permits in the Berners Bay area and 100 permits in the Gustavus area for 2012. As I understand, the previous need to harvest a large number of cows was brought about (in large part) due to the department's inability or uncertainty of allowing for a reasonable cow harvest in the years leading up to the first hunt in which the taking of antlerless moose was allowed. Only because of harvest levels well below the optimal level for several years previous did the herd balloon to a point so far from the sustainable ideal. So long as the department managers continue to have the ability to do so in the future, the BOG should assume that the herd can reasonably be expected to be managed well below the point where 30 or 100 cow tags is a rational number to be issuing.

Assuming prudent management, the scenario where the Dept would be justified in issuing this many antlerless tags is so unlikely to occur that it can be dealt with on an emergency basis. Hence, I suggest that this proposal be amended so that the maximum number of tags to be issued is reduced to a more plausible number so that the hunting and non-hunting public is not misled about the size and health of the Berners Bay and Gustavus moose herds.

Sincerely,



Tad Fujioka



As I will be out of state and unable to appear in person, please accept my testimony regarding my opposition to proposed regulation changes on **crossbows and mechanical broadheads**.

Thank you for the opportunity to submit my comments and also for the considerable time and energy you devote to the wise management of our wildlife resources.

I am a long time archer who has taken many of Alaskan big game species with a bow and have volunteered to teach bow hunter education for over 15 years. Because I highly value the bow hunting opportunities Alaska provides, I offer the following comments.

Regarding crossbows. Cross bows by definition are not bows as currently defined in regulation in that they are not held at full draw by human power alone. I recommend that crossbows be kept in their own separate category as they can be shot off a rest, often use telescopic sight, and in general have more similarities to a rifle than a bow. If crossbows are regulated as their own separate category I would also recommend that classes in crossbow hunting be required as they are in hunter education and bow hunter education.

The classes should address personal safety issues in using a crossbow and awareness that while they are similar to a rifle they are shorter ranged and the crossbow bolt kills differently than a bullet. Without a cross bow education requirement, in my view, the wound/loss rate will increase and the danger of personal injury will continue.

Regarding mechanical broad heads. Current regulations allow their use on thin skinned Alaska game, such as deer, caribou, or black bear while preventing their use on larger heavier game such as moose, brown bear, or muskoxen. In my personal experience I have found that mechanical broad heads can fail when encountering heavy rib or larger bones. In my view if the regulations are changed and mechanical broad heads are allowed to be used on heavier Alaskan big game, the wound /loss rate will increase and the general public will likely see more wounded animals impaled with arrows, thus giving all hunters a had name.

Thank you once again for considering my testimony and for your service to Alaska.


Con Bunde

1434 Bannister Dr.

Anchorage, AK 99508



Proposal #40

I'm writing this to the dept. of game to voice my opposition to this proposal. The reason is I believe that Gyrfalons may be taken to the detriment of the species. It also could open up abuse of the regulations because of the possible sale of Gyrfalons on the world market. It would be almost impossible to regulate the illegal take of this species in Alaska. I recommend a NO vote on this proposal.

Robin Collman

Robin Collman
Seward AC member

12-16-2011
Seward Alaska



DECEMBER 20, 2011

WRITTEN COMMENTS ON BOARD OF GAME PROPOSALS

PROPOSAL NUMBER 35: INTENSIVE MANAGEMENT IN GMU 15A—AERIAL SHOOTING OF WOLVES

I OPPOSE THIS PROPOSAL AND STRONGLY URGE THE BOARD TO REJECT IT

During the past thirty years, moose hunters in many areas of Alaska faced a common problem—there were too few moose and too many hunters. The Board of Game responded by approving a large-scale program of intensive management aimed at reducing predators. Now, we have aerial shooting of wolves, greatly expanded wolf hunting and trapping seasons and extreme measures designed to reduce bear numbers.

Biologists know that in certain areas where inadequate food limits moose populations, predator control will not produce more moose. For example, on the northern Kenai Peninsula in GMU 15A, there are only about half as many moose as 20 years ago because the forest has matured and browse is scarce. Shooting wolves will not solve that problem.

A year ago, Alaska Department of Fish and Game biologists recognized that the moose population objective set by the Game Board for northern Kenai Peninsula moose should be lowered. Given the current habitat conditions, the existing objective was likely unattainable and surely unsustainable if reached. The Board rejected this proposal and instead requested an intensive management plan. The Department complied and presented a plan featuring measures to improve the habitat and produce more browse.

The Board rejected this approach and instead requested a plan designed to reduce wolf numbers. Sadly, instead of standing its ground and emphasizing the biological facts, the Department complied and recently released a feasibility assessment recommending an aerial wolf shooting program costing \$700,000.

Ever since the first predator control programs began in 2003, biologists have criticized them as not employing sound science. Clearly, preliminary field studies should document predator and prey numbers and establish whether or not predation is limiting prey rather than bad winters, heavy hunting or poor habitat. Only then can we decide if reducing predators is a valid option.

The northern Kenai Peninsula feasibility assessment proposes research on moose and wolves to answer key questions, but only after wolf control begins. That is not sound science. The assessment does not address bear predation despite previous research in this area that indicated bear predation on young moose calves far outweighed wolf predation. And it recognizes that measuring the success or failure of reducing wolves will be difficult given the current lack of information on moose movements and wolf territory locations.

The assessment also indicates that aerial wolf shooting will occur on only a very small portion of the northern Kenai Peninsula, about six percent of the total area, due to land ownership patterns. About



seventy-nine percent of the land is National Wildlife Refuge and off limits to aerial shooting. With only a very small portion of the area subject to wolf control, it is unlikely that the program will meet its objectives.

But most troubling is the main purpose of the wolf control effort. Past intensive management programs have aimed to reduce predators in order to re-build reduced moose populations. Department biologists recognize that on the northern Kenai this is not possible because poor habitat, not predation is limiting moose numbers. As a result, the Board devised a new justification for wolf control—to “reallocate” to hunters the moose killed by wolves without increasing moose numbers. In my view, this new approach is exceedingly dangerous. If adopted, it opens the door to reducing wolves to very low levels everywhere throughout Alaska as hunters claim that they need not share moose with wolves.

Aerial wolf control on the northern Kenai Peninsula is a bad idea that should be abandoned. Biologists agree that poor habitat, not predation is limiting moose. Research answering basic biological questions should precede wolf reduction, especially given prior work showing bears were major moose predators. Aerial shooting on only six percent of the area will likely not be effective. And adopting a new justification for wolf control featuring reallocating moose from wolves to humans without increasing moose numbers is a backward step that may threaten wolves across a broad area of Alaska. The Board should reject aerial shooting of wolves as an intensive management tool in GMU 15A and instead focus on a habitat enhancement approach.

Vic Van Ballenberghe

Anchorage



Oppose 35 and 36

Alaska is a unique and remarkable place in this world. Can there be room in the vastness of your state to allow wolves to live their natural lives? Is it possible that more tourist dollars can be raised for the state by preserving the wolf than by killing it? I would predict that, as our wild areas are lost in this country, Alaska would be one of the final wild frontiers for our children and grandchildren to see. Let's not preserve the moose simply for men to pay to shoot. Let's preserve the balance God intended.

I can promise you that my husband and I will visit Alaska and spend our vacation dollars there IF you can see your way clear to ending the shooting of wolves. Please send me any information available on tours which involve wolf sightings.

Respectfully,

Kris Wheaton
1725 N. Diego Circle
Mesa, AZ 85205



Bill Sherwonit
2441 Tulik Drive
Anchorage, AK 99517
907-245-0283 akgriz@hotmail.com

Dec. 20, 2011

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

Members of the Board of Game,

I wish to express my strong support for Proposals 127 and 142, submitted by the Alaska Center for the Environment. At the same time, I emphatically oppose Proposal 131, which would add black and brown bears to the state's "predation control program" in GMU 19A. Among other things, this Department of Fish and Game proposal would allow the snaring and subsequent killing of any black or brown bear, including sows and cubs. As you're aware, both Proposals 127 and 131 are part of the Statewide Regulation Proposals, to be discussed at the BOG's January meeting, while 142 applies to the Interior.

I am especially alarmed that the department has proposed the snaring of black *and* brown bears in Unit 19A, when it only recently completed an "experimental" brown-bear snaring program in Unit 16B, the results of which have not been publicly discussed by Fish and Game staff with the Board, nor has any report been issued, examining the results of that "experiment." I recently obtained the department's "Bear Control Snaring Summary" for 2010 and 2011 and it has prompted many questions, which so far have not been adequately addressed.

As you know, the snaring of bears is highly controversial, for good reason. This "harvest" method remains scientifically indefensible and it is ethically repugnant to many Alaskans, including wildlife scientists (even some, no doubt, within the department). A substantial number of widely respected bear biologists—a number of them at one time employed by the Alaska Department of Fish and Game—and other wildlife scientists have expressed their concern (dismay might not be too strong a word) that the BOG and Fish and Game are intent on reducing brown bear numbers in several parts of Alaska, with no evidence that such reductions actually make more moose available to hunters (the supposed reason for such bear-control/reduction programs). It appears the state is not interested in science-based predator-control programs, but simply wants to kill as many bears and wolves as possible, in the hope that this will produce more hunting opportunities for humans. This is bad policy and needs to be changed.

Besides the problem with the state's science—or better put, the absence of a scientific justification—there is the snaring issue itself. For nearly all of Alaska's history as a state, the Department of Fish and Game and BOG has emphasized the importance of protecting female bears with cubs and, of course, the cubs themselves. In only a few



years, state wildlife managers and BOG members have turned this ethic on its head. Or rather abandoned the ethic altogether. It now seems that in some parts of Alaska, as in the Old West, the only good bear is a dead bear. What's important is that as many bears be killed as possible. Some BOG members and department administrators might argue that normal ethical standards and fair-chase ethics don't apply to predator-control programs. Well, that certainly seems to be true for those now running the show. But if societal values and ethical standards don't matter, then why were such "control" strategies as poisoning and bounties eliminated? In expanding its predator control efforts, the state has incrementally pushed the boundaries of what is permissible, almost as if trying to see how far it can go before there's a public uproar and pushback. Well, I'd suggest we've just about reached that place. I guess we'll find out.

I would argue that the snaring of bears is an unnecessarily cruel way of "controlling" their numbers. This is especially true for females with cubs. We members of the public don't know enough about the specific circumstances of snaring operations to be convinced that bear-snaring operations are done humanely (in fact the notion of humane snaring strikes me as an oxymoron). And given the BOG and Fish and Game's actions in recent years, many of us Alaskans would have difficulty believing state assurances that snared bears suffer little while caught. How many hours pass before a trapped bear is shot? And what happens when a female bear with cubs is trapped? Does no significant suffering occur then?

The snaring of bears, black and brown, needs to stop, whether as a predator-control technique or a more general harvest method. The state's war on predators has for many years been steeped in controversy, with dubious benefits to human hunters; but in recent years its expanded onslaught has reached appalling extremes. Nothing is more shameful than the current scientifically unjustifiable program to snare and kill any and all bears that state employees or their "agents" can entice into traps, mothers and their cubs included.

Thanks for considering my comments,



Bill Sherwonit



Alaska Department of Fish and Game,

In regards to Proposal 35-Unit 15A, I am against this proposal. Let me express my reasons.

Proposal 35/Unit 15A:

- 79 percent of the 1,314 square miles of land is the Kenai National Wildlife Refuge where aerial wolf hunting is prohibited.
- The proposed area for wolf killing is smaller than any area where aerial hunting has been allowed which can cause difficulties.
- The main reason biologists have given for low moose population is declining habitat and moose browse, creating an unsustainable environment resulting in starvation. Killing wolves would only add to this problem.
- The human population has increased so that there will never be enough moose for everyone who wants to kill one and realistically there never will be.
- In a 9-1 vote, the Homer Fish and Game Advisory Committee recommended that the Board of Game not approve this intensive management.
- KNWR attracts thousands of tourists. This plan is incompatible with wildlife viewing and would cause negative publicity and be a deterrent to tourism. The wolves are worth more alive than dead.
- The ADF&G brochure notes that predator control isn't done until biologists have studied the causes of declining game populations and the impact of predators and tried other methods, such as improving habitat, reducing hunting and easing predator trapping and hunting regulations.
- ADF&G did receive funding to conduct moose studies in Unit 15A and Unit 15C and plans to do that next March, as well as wolf research. That would be after aerial wolf control starts in January, if approved.

Please consider these facts before it is too late,



Cindy Birkhimer



Alaska Department of Fish and Game,

In regards to Proposal 36-Unit 15c, I am against this proposal. Let me express my reasons.

Proposal 36/Unit 15c:

- Near Homer and Anchor Point, the general moose population has been healthy, with a 30 percent increase from 1992 to 2010. The moose population is in the middle of the objective number of moose, indicating there is no emergency need for such heavy-handed methodology. See above highlighted comment on ADF&G brochure.
- BOG implemented a change to Unit 15C removing spike, fork, and 3 brow tine from harvestable moose population and there has not been time to see the effects of these changes. So an aerial wolf kill program is premature.
- Biology does not support this intense management program as moose population concerns in 15C are not driven by wolf predation but the result of an insufficient harvest strategy which has been exacerbated by illegal harvest and moose-motor vehicle collision.
- Unit 15c has an abundance of other food source including fish, organic beef, and great gardening climate. Unit 15c is on the road system, which increases the hunting pressure on moose.
- The human population has increased so that there will never be enough moose for everyone who wants to kill one and realistically there never will be.
- In a 9-1 vote, the Homer Fish and Game Advisory Committee recommended that the Board of Game not approve this intensive management.
- The ADF&G brochure notes that predator control isn't done until biologists have studied the causes of declining game populations and the impact of predators and tried other methods, such as improving habitat, reducing hunting and easing predator trapping and hunting regulations.
- ADF&G did receive funding to conduct moose studies in Unit 15A and Unit 15C and plans to do that next March, as well as wolf research. That would be after aerial wolf control starts in January, if approved.

Please consider these facts before it is too late,

Cindy Birkhimer 





Alaska Office

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

FAXED
12/21/11

December 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 January 13-17, 2012 Board of Game (BOG) meeting in Anchorage, 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.

Defenders of Wildlife along with The Alaska Center for the Environment and The Alaska Wildlife Alliance are resubmitting comments below that were previously provided to the Board of Game for proposals 35 and 36 since discussion regarding these proposals were postponed until the State-wide Board of Game meeting in January 2012.

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

National Headquarters

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



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 EA. 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 BCG'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_awcr.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.

GENERAL COMMENTS

Defenders has monitored BOG actions and has regularly provided detailed technical comments for more than a decade. Throughout that time, we have witnessed a steady expansion of predator control programs as well as an expansion of allowable methods and means of harvesting predators. These changes are epitomized in the recently approved BOG wolf and bear management policies. Several proposals which will be considered at the January, 2012 BOG meeting – including proposals 101, 109, 114, 118, 119, 120, 122, and 123 – further demonstrate the disturbing trend regarding the means by which residents and non-residents propose, are allowed, or are encouraged to, harvest predators in Alaska.

Defenders has long argued that intensive management plans developed through the BOG process fail to meet basic biological and social recommendations set forth by the National Research Council (NRC) in 1996. While predator control may be an effective means of attaining higher game populations in some Game Management Units, the same is not true throughout Alaska. Unfortunately, the state continues to maintain that reducing predation in the hopes of attaining more game is effective and appropriate everywhere game is considered depleted, whether or not predation is a cause of the depletion and whether or not reduction of predators results in game increases. Further, currently approved predator control programs are not designed to monitor or test whether increases that do occur are the result of predator control or some other variable.

Regardless of whether or not the expansion of controversial harvest methods has a significant impact on the sustainability or viability of certain predator populations, we continue to question the scientific principles on which utilizing such methods are based. We also question whether these trends are good for Alaska; and whether these actions will serve both hunters and non-hunters in the long term.

Alaskans value wildlife for numerous reasons in addition to consumption, including aesthetic, intrinsic and ecological; these values tend to be ignored under Alaska's current wildlife management regime. While the non-hunting majority in the state generally respects and supports the rights of the hunting minority, it is equally important that the reverse be true. Overwhelming evidence suggests it is not.

By allowing or promoting the continual expansion of controversial wildlife management tools, the BOG has demonstrated disdain for the opinions of certain hunters, non-consumptive users, and numerous wildlife professionals. Such expansion of allowable means to kill predators is working to eliminate the respect the general public holds for hunting traditions in Alaska.



Whether a hunter or not, most Alaskans want wildlife managed scientifically to insure long term population viability and the maintenance of ecosystem function. The majority also feel that wildlife should be respected and that the utility of harvested wildlife should be maximized. Without such standards, all predator management programs will continue to be met with a lack of trust and support by the much of the public.

COMMENTS ON SPECIFIC ALASKA BOARD OF GAME PROPOSALS

Proposal 44. We oppose this proposal and urge the BOG to reject it.

Passage of this proposal would allow hunters who win governor permit tags to hunt out of season with modifications to methods and means of harvest.

Proposal 48. We support this proposal and urge the BOG to adopt it.

This proposal aims to prohibit the sale of bear parts harvested on National Park Service (NPS) lands.

Legal sale of bear parts is intended to incentivize increased harvest of black bears with the hope that reductions in bear populations will translate to an increase in ungulates. However, evidence that such incentives will achieve the goal of increasing ungulate harvest is lacking. Further, incentivizing the sale of wildlife parts runs counter to a long standing tradition of preventing wildlife commercialization. Such allowances also complicate enforcement of laws banning the sale of bear gall bladders. Finally, we agree with the proponent that the intentional manipulation of wildlife populations is contrary to NPS policy and therefore inappropriate on NPS managed lands.

Proposal 51. We support this proposal and urge the BOG to adopt it.

Passage of this proposal would allow ADF&G to require the latitude and longitude of kill locations on the harvest report for drawing and registration hunts.

We agree that more precise information on harvested populations will allow more effective harvest management. Being more sensitive to signs of overharvest is one of the primary management recommendations of the NRC. This proposal would provide managers with one of the tools necessary to meet the NRC's recommendation.

Proposal 94. We support this proposal and urge the BOG to adopt it.

This proposal aims to prohibit the taking of wolf, fox, wolverine, or coyote during May, June and July on NPS lands.

In recent years, the BOG has made numerous regulatory changes aimed at increasing the take of predators with the goal of decreasing predator populations and increasing ungulates for human harvest. We agree with the proposal's proponent that purposeful manipulation of wildlife populations is not appropriate for NPS lands. We also agree that



furbearing mammals should not be harvested during denning periods and when pelts are not prime.

Proposal 97. We support this proposal and urge the BOG to adopt it.

This proposal aims to prohibit the use of artificial light for taking game on all lands managed by NPS.

Defenders does not support methods and means of wildlife harvest which do not adhere to the principles of fair chase. While we would prefer that such methods not be allowed in any part of the state, we agree with the proponent that such methods are especially inappropriate on NPS lands.

Proposal 108. We support this proposal and urge the BOG to adopt it.

This proposal, if passed, would prohibit the taking cubs and sows with cubs on NPS lands.

We agree with the proposal's proponent that the sole purpose of allowing the taking of cubs and sows with cubs is to decrease bear population with the hopes that ungulate populations will increase. Such manipulation of wildlife populations runs counter to NPS policy and is not appropriate for NPS lands.

Proposal 109. We oppose this proposal and urge the BOG to reject it.

The proponent of this proposal, the "Greater Alaska Black Bear Committee" (GABBC), is a committee unknown to us prior to seeing their proposals outlined in the November proposal book. According to the proponents, the proposal consists of several consensus items from a black bear resource user's group held at the March 2011 BOG meeting. However, the proposal does not identify who organized the committee, who its members are, how its members were selected, and whether meetings held by the committee were open to the public. This information would be valuable for lending transparency to the public BOG process.

Proposal 109 puts forward several overarching regulatory changes for black bear management in Alaska including:

1. No closed season for much of the state.
2. Increasing the statewide bag limit for residents and non-residents to 3 bears.
3. No bag limit for all intensive management areas where black bears are recognized as contributing to the decline of prey species.

The GABBC claims that this proposal clarifies and removes complicated or excessively restrictive regulations and ADF&G's discretionary provisions pertaining to black bear hunting. The proponents apparently aim to allay concerns over the wide-ranging implications of the regulatory changes by stating that "All of these suggestions were approved by all members of the group." However, as stated previously, we do not know



the origins or membership of this group and therefore we do not believe that such wide-ranging liberalizations necessarily represent the wise management of Alaska's black bears.

Regulations for black bear harvest differ in part due to differences in population densities, differing access to hunters, historical harvest level and conservation concern. While it may or may not be true that populations can sustain increased level of harvest across all units, the ADF&G has not presented robust evidence which supports the GABBC's presumption. Indeed bear population data remain inadequate throughout the majority of the state due to the difficulty of censusing bear populations. Population estimates are often based on anecdotal evidence, extrapolations, and harvest composition data – none of which are appropriate substitutes for well designed research and monitoring programs.

Because hard data do not exist in much of the state, the proposed liberalized regulations could have negative consequences for the sustainability of regional bear populations. Further, the fact that the BOG has already relaxed sealing requirements in parts of the state – further thwarting the collection of valuable population data – complicates the ability of ADF&G to recognize and address regional signs of overexploitation.

In addition to concerns over black bear population sustainability, automatically allowing for year round harvest of bears with no bag limit in areas where bears have been implicated as having an impact on prey species abundance circumvents the process by which predator control programs are proposed and adopted. The BOG historically adopts predator control programs through a public review process whereby the public has the opportunity to weigh in on each plan through the comment period and through formal testimony.

Defenders also questions whether black bears harvested during certain times of the year can be fully utilized and what effect year round harvest would have on dependent young. During parts of the year, cubs are completely dependent upon the sow for survival. Allowing the take of bears during such times will result in the indirect death of dependant cubs – regulations that can result in the death of young animals is not considered sound wildlife management. In addition, bear hides and meat are not of high quality during all seasons. Therefore, allowing year-round harvest of black bears could result in the waste of a valuable resource.

Blanket regulations which allow year round bear hunting throughout the majority of the state, unlimited harvest in certain areas, and increased statewide bag limits perpetuates the viewpoint that because black bears are predators their populations are in need of reduction. We do not share this perception. Rather we view black bears as a valuable wildlife species that play an integral role in maintaining ecosystem health and function.

Proposal 114. We *oppose* this proposal and urge the BOG to reject it.

If passed, this proposal would allow black bear to be taken same-day-airborne within ¼ mile of bait station.



This proposal unnecessarily liberalizes the methods and means of taking black bears by essentially legitimizing the spotting of game while airborne. Regulations allowing for the harvest of an animal ¼ mile from a baiting site would be difficult to enforce and could be an abuse of the Airborne Hunting Act.

Proposal 118. We generally *oppose* this proposal but *support* certain sections.

The goal of this proposal is to clarify and modify the permit for hunting black bear with the use of bait and scent lures.

Defenders supports clarifying regulations regarding the harvest of all species where such clarification will promote the conservation of wildlife species and improve enforcement of wildlife regulations. Therefore, we *support* sections 1A, 1B, and 7 of this proposal. However, we *oppose*, sections 4, 10, and 13 which liberalize the use of bear baiting as an accepted harvest method and allow same day aerial harvest of bears at bait stations.

Despite claims made by the GABBC in the November 2011 BOG proposal book, bear baiting is a contentious issue in Alaska as it does not meet the principles of fair chase. It can also cause public safety concerns due to habituation of bears to human foods and the potential for humans encountering bears over bait in areas used for recreation. Further, allowing the same-day airborne taking of bears could be an abuse of the Airborne Hunting Act. Defenders of Wildlife does not oppose wildlife harvest methods that are biologically justified and those that adhere to principles of sound wildlife management and fair chase. However, we will continue to oppose practices that do not adhere to these principles.

Please see our general comments at the beginning of this comment letter.

Proposal 119. We *oppose* this proposal and urge the BOG to reject it.

This proposal aims to establish a codified location for permitted black bear bait stations and to establish seasons for all of Alaska.

Bear baiting is a contentious issue. It does not meet the principles of fair chase and can cause public safety concerns. Defenders of Wildlife does not oppose wildlife harvest methods that are biologically justified and adhere to principles of sound wildlife management and fair chase. However, we continue to oppose practices that do not adhere to these principles.

Proposal 120. We *oppose* this proposal and urge the BOG to reject it.

This proposal aims to eliminate the requirement of a predator control permit for black bear baiting in predator control areas.

As stated in our comments for proposal 118, despite claims made in the November 2011 BOG proposal book, bear baiting is a highly contentious method of harvest which does



not adhere to the principles of fair chase and can pose public safety hazards. We therefore do not support baiting being considered a general harvest method.

Further, while this proposal states that unlimited taking of sows with cubs or cubs would still be subject to a predator control permit, **proposal 109** eliminates the need for predator control permits to take sows with cubs and allows unlimited take in predator control areas. Therefore, if **proposal 109** were passed unlimited take would be allowed. It is worth noting that these two contradictory proposals were both submitted by the GABBC.

Please see our general comments at the beginning of this comment letter.

Proposal 121. We support this proposal and urge the BOG to adopt it.

This proposal aims to prohibit black bear baiting on all NPS lands.

We agree with the proponent of this proposal that baiting of black bears poses a risk to other wilderness users – especially in national parks and preserves where non-hunting recreationists occur in greater numbers than on adjacent state lands.

Proposal 122 and 123. We oppose these proposals and urge the BOG to reject them.

These proposals aim to allow the use of scent lures for black bear baiting while floating.

We do not support bear baiting as a harvest tool because it does not adhere to the principles of fair chase and poses public safety concerns. We therefore do not support proposals that would expand bear baiting practices.

Proposal 126. We support this proposal and urge the BOG to adopt it.

This proposal aims to prohibit the trapping of black bears on all NPS lands.

We agree with the proponent of this proposal that baiting and trapping of black bears poses a risk to other wilderness users – especially in national parks and preserves where non-hunting recreationists occur in greater numbers than on adjacent state lands. Snaring or trapping of black bears is a practice meant to reduce bear populations in the hopes of attaining higher ungulate populations. Such manipulation runs contrary to NPS policy and is therefore not appropriate on NPS lands.

Proposal 127. We support this proposal and urge the BOG to adopt it.

Passage of this proposal would prohibit the taking of a black bear by trap or snare.

We agree with the intent behind this proposal. Snaring and trapping of black bears requires the use of bait stations, which we oppose on fair chase principles. Though managers may be interested in developing more tools to control predation in the state,



such tools should not be considered general hunting strategies. Since adequate black bear population data do not exist across much of the state, we find it inappropriate to expand the methods and means by which bears are harvested. In general black bears should be harvested conservatively with the goal of maintaining healthy and viable populations.

While black bears have been implicated as significant predators of moose calves, there have been no studies demonstrating that increased take of black bears translates into more harvestable moose. Likewise, since snaring and trapping of black bears has not been allowed since statehood, no empirical evidence exists which demonstrates that this method will lead to increased moose harvest.

Any program that utilizes bear control as a tool must be rigorously designed and executed and the results carefully monitored in order to determine whether controlling bear populations is effective in achieving the goal of increased harvestable surplus. Any such program must incorporate the NRC's recommendations for managing predators and prey in Alaska.

Proposal 129. We oppose this proposal and urge the BOG to reject it.

According to ADF&G, this proposal is meant to clarify the responsibilities of the ADF&G Commissioner as they relate to wolf and bear predation. However, the proposal instead blurs the line between the Commissioner's and the BOG's respective authorities, fails to comply with applicable statutes and regulations, and is unnecessary for achieving its stated goals.

Proposal 129 overextends the Commissioner's authority. The authority to regulate predation through methods, means and harvest levels, and through the adoption of intensive management plans, rests solely with the Board. *See* AS 16.05.255(a)(6) and (e). Though imperfect, the BOG process provides at least some opportunity to consider various factors influencing ungulate populations. We oppose codifying language changes based on an interpretation that the Commissioner has the authority to take action whenever predators threaten wildlife.

Proposal 129 purports to only cover "isolated takings" "for immediate protection of wildlife populations." Almost all IM programs, if viewed generously, could fit this description. Since wolves and bears do consume moose and caribou, the Commissioner could theoretically declare a need for the *immediate protection of wildlife* at any point when bears or wolves appear in the presence of an ungulate or ungulate population. Further, the Commissioner might consider it necessary to declare an emergency whenever bull: cow or calf: cow ratios decline. Again, this authority resides with the BOG; the adoption of Proposal 129 would improperly shift that authority to the Commissioner.

Such a shift lacks statutory and regulatory basis. The BOG is vested with the authority to regulate predation through methods, means, and harvest levels, and through adoption of intensive management plans. AS 16.05.255(a)(6) and (e). The Commissioner, on the other hand, possesses the power to take predators for public safety reasons, *see* AS 16.05.050(a)(5), and, in an emergency, may open or close seasons or areas to protect fish



or game. AS 16.05.060. However, that is the extent of the Commissioner's emergency authority. The statutes cited in the proposal do not support expanding the exceptions contained in 5 AAC 92.110 (Control of predation by wolves) and 5 AAC 92.115 (Control of predation by bears).

Furthermore, such an expansion is unnecessary to achieve the stated goals of Proposal 129. First, the Commissioner already has ample legal authority to take immediate action to protect public safety. AS 16.05.050(a)(5). This authority has been exercised recently. For example, numerous wolves were taken via aerial control outside of Chignik Lake in the spring of 2010. In the spring of 2011, nine wolves were taken via trapping at the Joint Base Elmendorf Richardson. Though these actions were controversial and many members of the public felt that more emphasis should be placed on education and on providing residents with the tools to prevent human-predator conflict, at least the Commissioner tried to tie and justify its actions to a purported threat to human safety, consistent with its statutory authority. No such justification exists in the case of Proposal 129.

Second, the Commissioner can act in emergencies to protect wildlife populations by opening or closing seasons. AS 16.05.060. One example of this authority being successfully exercised is the routine emergency closure of Nelchina Caribou hunt to prevent overharvest when the herd is located too close to the road.

Third, monitoring programs exist to prevent emergencies from arising. Ungulates in Alaska are routinely monitored. Population trends and parameters including bull:cow and calf:cow ratios are routinely reported. While these parameters do not always give the full picture of population health, they are routinely relied upon by ADF&G when the agency proposes regulatory changes and intensive management programs. AS 16.05.255 and 5 AAC 92.125 already provide the needed authority to reverse negative wildlife population trends in a timely fashion. If ADF&G's monitoring programs are insufficiently detecting negative trends to the point whereby populations become threatened with extirpation then the agency needs to reconsider its monitoring priorities and protocols. Additionally, wildlife populations are sometimes threatened with numerous factors including stochastic events, habitat limitations, climate change, weather and disease. Even in such cases, trends can usually be detected prior to an emergency being declared. We find it would be inappropriate to take immediate action to control predation without understanding other factors contributing to ungulate declines.

Finally, proposal 129 states that changing the regulatory language is necessary to clarify that the Commissioner has the authority to immediately take predators to protect wildlife populations in danger of *extirpation*. However, the proposed language does not reflect the goal of protecting wildlife solely in danger of extirpation; rather the language seems to broaden the authority to include issues of immediacy whenever wildlife populations are in need of protection:

“[TO] for immediate [PROTECT] protection of [THE ANIMAL] wildlife populations or the general public or property under AS 16.05.020.” ([indicates deletions], indicates insertions).



We consider the Commissioner's authority to take predators to be limited to actions related to extirpation as outlined above; however we generally do not oppose the control of predation when control is supported by the best available science which demonstrates that there is a risk of extirpation to an imperiled species that is fulfilling a unique ecological role and where predation is demonstrated to be the primary limiting factor. The state currently lacks a process by which such actions would be approved and conducted.

Proposal 130. We oppose this proposal and urge the BOG to reject it.

This proposal seeks to authorize a brown bear predator control program under 5 AAC 92.125 to protect muskoxen in Unit 26B.

We do not support the control of brown bear predation to protect this herd prior to understanding the full nature of the decline and absent development of adequate monitoring and assessment protocols. We further do not support the implementation of an intensive management plan to control predation by brown bears because it contradicts one of the original purposes for which the Arctic Refuge was established by ANILCA. Section 303(2) PUBLIC LAW 96-487 - DEC. 2, 1980 94 STAT. 2389 of ANILCA states that one of the purposes was to conserve fish and wildlife populations in the "natural diversity" and grizzly bears were expressly included under this language. Therefore, launching a predator control program against brown bears would be contrary to the statutory directive to maintain such bears in their natural diversity within the refuge.

The purpose of the intensive management statute is to provide for high levels of human harvest; not to address conservation concerns over certain wildlife populations. It would therefore be inappropriate to develop such a plan under the intensive management statute and regulations. While we do not support brown bear control at this time, we recognize that ADF&G has a strong interest in conserving the Northeast Alaska muskoxen population (NEAK) and support them in developing a monitoring or conservation plan to expand their understanding of the herd's recent decline.

Brown bears occur in low densities throughout the Arctic. According to ADF&G's 2007 Brown Bear Management Report, brown bears in Unit 26B are estimated to occur at a density of 1.7 bears/100mi² which is considered low to moderate; however, a robust population assessment has not been completed. Instituting a predator control program intended to reduce predator populations in the absence of accurate predator population data potentially threatens the sustainability of the population and violates the recommendations set forth by the NRC.

In addition to concerns over sustainability of brown bear populations, we are also concerned that the root cause of the decline has not been determined. ADF&G's 2008 Muskoxen Management Report indicates that blood and tissue samples from muskoxen that had died indicated prevalence of various pathogens and concentrations of trace minerals. The study found that in addition to numerous diseases that may influence



reproduction and survival, concentrations of copper were insufficient to maintain healthy immune function, reproduction, or survival through weaning. ADF&G also indicated that female muskoxen were calving alternate years, perhaps due to nutritional limitations.

The 2008 report speculates that changes in distribution of muskoxen in 26B may be influenced by overexploitation of winter habitat. Reynolds 2011 cited overgrazing of winter habitats, weather – including icing events and deep snow, drowning, and potentially disease and parasites as factors contributing to the decline of muskoxen in the Arctic Refuge; similar factors may have contributed to the decline in 26B.

The 2008 report also states that the population has been relatively stable since 2006 and recognized that progress had been made towards stabilizing the population at ≥ 200 . The goal of maintaining a bull: cow ratio of $\geq 35:100$ animals has also been met in recent years. In their findings from an emergency meeting on 8-4-11, the BOG cites a 67% decline in the NEAK population from 1999-2006; the findings however fail to mention that the population was relatively stable from 2005-2011.

ADF&G has continued to research the NEAK. A study initiated in 2007 demonstrated high predation rates by brown bears; however, not all bears can be implicated in predation and therefore applying widespread control is unwarranted. Further, as recognized in the BOG's August findings, disease was also implicated as a source of mortality. While results assessing the prevalence of major diseases and parasites as well as nutritional status are not yet available, nutrition, disease, and extreme weather may have all played a role in the NEAK decline.

In addition to the short duration of time which has been devoted to studying this recent decline, during an August 4th, 2010 emergency teleconference the BOG took action to liberalize hunting in Unit 26B with the goal of reducing brown bear densities to protect muskoxen. We feel that insufficient time has been allowed to determine whether this action can achieve the goal of temporarily reducing brown bear predation; initiating a brown bear control program is therefore premature.

Muskoxen on the North Slope will continue to face challenges as weather and habitat conditions change due to warming temperatures. Since they are unlikely to be extirpated from this region in the near future, more time should be allowed to both understand the true nature of the decline and to determine if current management strategies are successful.

By seeking to understand the ultimate cause for declines in populations such as the NEAK, rather than simplifying the issue and addressing proximate causes, the ADF&G would better serve the conservation of the species and prevent doing undue harm to predator- prey dynamics. The role predation is playing in this particular herd may be beneficial to the ultimate survival of the NEAK especially if disease or nutritional limitations are determined to be widespread. Predators also have a positive buffering effect by preventing dramatic fluctuations in populations; such effects may be



particularly important in areas such as the Arctic which are especially prone to the effects of global warming.

In addition to the biological concerns outlined above, we also have concerns that instituting this program would be an inappropriate application of the intensive management statute.

The Intensive Management statute 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 (1) consumptive use of the big game prey population is a preferred use; (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 populations is feasibly achievable utilizing recognized and prudent management techniques. AS 16.05.255(e) (emphases added).

The statute defines “identified big game prey population” as “a population of ungulates that is identified by the Board of Game and that is important for providing *high levels of human harvest for human consumptive use.*” AS 16.05.255(k)(3) (emphasis added).

Furthermore, the statute defines “intensive management” to mean:

management of an *identified big game prey population* consistent with sustained yield through active management measures to enhance, extend, and *develop the population to maintain high levels* or provide for higher levels of human harvest, including control of predation and prescribed or planned use of fire and other habitat improvement techniques. AS 16.05.255(k)(4) (emphases added).

Regulations implementing the Intensive Management Statute, AS 16.05.255(e)-(g), establish minimum harvest levels that must be met before an ungulate population qualifies as providing a “high level [] of human consumptive use.” 5 AAC 92.106(1). The only species listed are caribou, deer, and moose. *Id.* (“For purposes of implementing AS 16.05.255(e)-(g), the Board of Game will (1) consider the following criteria when identifying big game prey populations that are important for *providing high levels of human consumptive use:* (A) harvest size: the average annual historic human harvest *meets or exceeds values* as follows: (i) caribou: 100; (ii) deer: 500; (iii) moose: 100”) (emphases added).

The only species identified in this section are caribou, moose, and deer; muskoxen are not listed. Further, the minimum historic harvest size which would make these identified



species eligible for intensive management is 100 animals. According to ADF&G's harvest statistics from 1990-2005, an average of fewer than 5 muskoxen were harvested annually from Unit 26B. This harvest level clearly falls well below the identified population levels outlined in the administrative code for all identified species. Therefore, this population of muskoxen does not qualify for intensive management under applicable laws and regulations.

In addition to not meeting standards for minimum historic harvest, the BOG has not set population and harvest objectives for this population of muskoxen. *See 5 AAC 92.108* ("For purposes of implementing AS 16.05.255(e)-(g), the Board of Game has made **the following findings** on whether the listed big game prey populations, or portions of those populations, are identified as important for providing high levels of harvest for human consumptive use, **and has established the following population and harvest objectives...**") (emphases added).

Again, the only species where such findings have been established under this section are caribou, deer, and moose. Unit 26B has a negative finding for all three of these species. Muskoxen are not listed, thus population and harvest objectives have not been set. However, even if the BOG did set population objectives and harvest levels for muskoxen, the species historic harvest would not meet the threshold of "high levels of human consumptive use" outlined under AS 16.05.255, as discussed above.

Lenart, E.A. 2009. Units 26B and 26C muskox. Pages 48-69 *in* P. Harper, editor. Muskox management report of survey and inventory activities 1 July 2006-30 June 2008. Alaska Department of Fish and Game. Project 16.0. Juneau, Alaska, USA.

Reynolds, P. 2011 precalving muskoxen census in Arctic National Wildlife Refuge 26C and adjacent regions. U.S. Fish and Wildlife Service.

Thank you for considering our comments.

Sincerely,
Theresa Fiorino on behalf of KM Duth

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 (AWA) is the only group in Alaska solely dedicated to the protection of Alaska's wildlife. Our mission is the protection of Alaska's natural wildlife for its intrinsic value as well as for the benefit of present and future generations.



Dec 23 2011

Dear Sir

I am in complete favor of draining
any kind of wolf control.

Moose & Caribou are food for
people. Wolves are not.

Some bears could go to.

Thank you
Beverly Claus
Jim Claus



Fritz Wittwer/Marianne Jakob
PO Box 4
Parks Hwy Mile 227
Denali Park, AK 99755

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

12/15/2011

Proposal 213

Dear Sir or Madam:

We would like to express our strong opposition to Proposal 213.

Offering unit 20A as a non-motorized hunting unit has worked well for decades for locals as well as other Alaskans. We wish to keep it this way and ask you to not authorize a late season motorized hunt in the Yanert Valley.

This is a fragile area and letting ATVs and snowmachines into this environment will certainly damage the surrounding tundra-taiga.

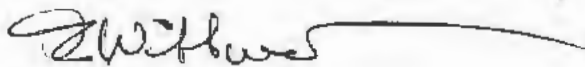
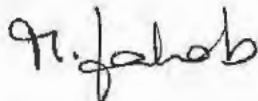
It will also have an impact on our lifestyle with an influx of people, noise, pollution as well as trespassing our properties.

Parked vehicles with trailers along the Parks highway will create an unnecessary hazard for locals as well as other drivers.

Thank you for your consideration.

Sincerely,
F. Wittwer

M. Jakob



December 22, 2011

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

Dear Alaska Board of Game:

I am firmly opposed to many of the changes that the Alaska Department of Fish and Game and Board of Game have made over the past several years. I do not support the snaring of brown or black bears; killing sows while with their cubs; year-round seasons; unlimited bag limits; or the killing of any animals while in their dens.

I absolutely do not support the killing of wildlife using aircraft. While I do support subsistence activities and the value of harvesting wild game to feed Alaskan families, I cannot support the widespread killing of bears and wolves.

I do fully support the #127 Statewide and #142 Interior proposals that Alaska Center for the Environment (ACE) has put forth and strongly recommend that the Board take these considerations seriously as part of the statewide meeting will be held in Anchorage January 13-17, 2012, as ACE represents the interests of thousands of Alaskans.

Thank you for your consideration.



Toby Smith
1034 W. 20th Avenue
Anchorage, AK 99503





The Alaskan Bowhunters Association, Inc.

P.O. Box 220047

Anchorage, Alaska 99522

907-929-3600 Fax 907-334-9691

www.akbowhunters.com

akbowhunters@gci.net

Comments to the Board of Game Statewide Meeting- Anchorage January 13-17,2012

Submitted December 21,2011

The Alaskan Bowhunters Association has two proposals before you at this meeting. However there are numerous other proposals that are of significance to us. We would like to comment on those proposals as well.

Proposal 96: to open areas for archery hunting if shotguns are allowed. This proposal by the ABA is probably just a housekeeping change in the regulations. We noticed that the Portage Closed Area (in unit 7) is closed to hunting with the exception of hunting small game, waterfowl and furbearers with shotguns. We believe that any area that is safe to hunt with shotguns should be safe to hunt with archery gear. We suspect that there are other areas Statewide that have similar wording. We do not believe that it is the intent of the Board to restrict hunting for small game with archery equipment. Please note that this proposal is NOT requesting legalization of hunting for big game in those areas. We are simply asking for the right to hunt small game, waterfowl or furbearers with archery gear anywhere statewide that they can be hunted with shotguns.

Proposal 105: to clarify the definition of wounded as it applies to restrictions of bag limits. This proposal by the ABA would insert the word "mortally" in front of wounded in any regulation requiring a wounded animal to be counted against your bag limit. We are strongly in favor of considering any mortally wounded big game animal (statewide regardless of species) as counting against the bag limit, even if the animal is not recovered. However, animals only superficially injured (regardless if arrow or firearm) will not be lost to the population. The reason this is important to bowhunters is that because bowhunters retrieve their projectile they are more likely to know if they have nicked an animal than is a rifle hunter



who may only observe the reaction of the animal to determine if he has wounded it or not. Any animal hit solidly in a body cavity with either rifle or bow should be considered mortally wounded and count against the bag limit even if not recovered. The ethical hunter will continue to hunt for any single animal that he has seriously wounded and will not hunt for another animal. Many animals in the wild suffer much more serious injuries from fights with others of their species or simple injury from falls (yes even goats and sheep fall sometimes) than is caused by a superficial wound with either bullet or arrow.

This type of regulation (wounded equals taken) started with bears in SE Alaska and is gradually spreading (regulation creep) to statewide and all species (see proposal #106). Some guides like it because it allows them to shut down a hunt as soon as a client nicks an animal. It is an attempt to encode ethics which is difficult to do and to enforce. However it does seriously limit an ethical hunter who knowing that he has superficially injured an animal must quit hunting to obey the law.

Proposals # 50, 109, 114-123: This entire group of proposals relates to the mind numbing complexity of the black bear hunting regulations statewide especially as they relate to baiting black bear but for other types of black bear hunting as well. The ABA is strongly in favor of significantly simplified regulations for black bear hunting. We are happy to have representatives of the ABA assist in committee meetings to try to determine what regulations are meaningful and what ones make no sense. Almost no where (except in SE Alaska) is the harvestable surplus of black bear being taken. Also over the last several years the Board of Game has dramatically expanded the methods and means for harvest of black bear but has kept restrictive and confusing discretionary regulations in place especially on black bear baiting.

Proposals # 53, 55 & 56: Regarding crossbows. The ABA believes that there should be definitions for what constitutes a legal crossbow for taking big game in Alaska. We do not pretend to have expertise with crossbows and are happy to allow the ADF&G to make the definition. The ABA has never been opposed to allowing PERMINENTLY DISABLED hunters, unable to use normal archery gear) to use crossbows in regular archery seasons as long as they are able to pass the IBEP education and qualifying test.




Proposal # 54: The ABA is OPPOSED to simply defining crossbows as bows and allowing them in archery seasons. This has been a trend in states in the lesser 48 as a result of needing more license sales, more whitetail deer killed and has been pushed by crossbow manufactures. As a result there have been safety issues, actually declining license sales (Georgia) and inadequate education and accountability for crossbow hunters. It would be a mistake to adopt this proposal as written.

Proposal # 57 & 58: We recommend NO ACTION. The ABA was heavily involved in making the current regulations that require fixed blade broadheads for the biggest of our big game.

Proposal # 59: lighted nocks. The ABA believes that lighted nocks are currently legal but should NOT be required. We OPPOSE this proposal.

Proposals # 60 & 61: TAKE NO ACTION the person proposing these changes does not understand the physics of the compound bow. All of the energy is, in fact stored in the limbs. The cams simply make it mechanically easier to store the energy in the limbs.

Thank you for your consideration of our comments


John D Frost

Legislative Vice President of The Alaskan Bowhunters Association.





Wise Eagle Wildlife Art

PO Box 303
Wrangell, Alaska 99429

phone: 907-874-2497
Email: wiseagle@aptalaska.net

December 20, 2011

Alaska Dept. of Fish and Game
Boards Support Section
PO Box 115526
Juneau, AK 99811-526

ATTN: Board of Game Comments

These comments pertain to Proposal 49 regarding taxidermists maintaining log books.

I have no problem with requiring log books since this isn't much different than what I do already. I am concerned that this is just the first step that will lead to more obtrusive regulations later.

The original proposal that has here been amended included inspections of my business. This I am opposed to since my business is located at my personal residence and would therefore entail a search/inspection of my home. Supposedly the purpose of this original proposal was to provide Alaska Wildlife Troopers (AWT) with the tool necessary to apply for a search warrant if needed. If the only probable cause AWT would need to search my personal residence is the fact that I possess a taxidermy license, I will close up my business. If this also applies to the fact that I'm an appointed sealer, I will give up that appointment as well, leaving my friends and neighbors with no way to seal their bears and furs when the local ADFG employee is not working, which is quite often and unpredictable.

AWT states that law abiding taxidermists and appointed sealers shouldn't have any problem with this, but I do. I don't feel I should have to give up my 4th amendment rights just because I'm a taxidermist and/or appointed sealer. If all of the Alaska Wildlife Troopers were as reliable, knowledgeable and trustworthy as some of the good ones I have encountered over the last 24 years here in Alaska, I wouldn't be that worried. But unfortunately, I have run into several that weren't, including:

- one who couldn't tell the difference between a brown/grizzly bear and a brown-phase black bear
- two troopers that couldn't tell that the haunch in our personal use shrimp pot was from a domestic sheep (that had died from unknown causes and still had some hide near the hoof with curly white hair) and tried to charge us with using a deer



for bait. That trooper also kept all of the shrimp from our pots and made a snarled mess of our gear. One of those troopers was later suspended for stealing crab from commercial crab pots.

- a trooper trainee that filed an assault complaint against my husband who had gotten into a rather mild verbal argument with the trainee's girlfriend (that she had started).

We don't need a trooper that has a grudge against us to use the excuse of my taxidermy business or appointed sealer status to search our personal residence trying to find something to charge us with or just to hassle us.

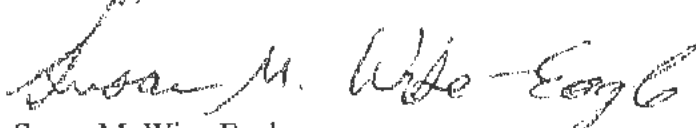
I'm also concerned about the safety of a trooper searching through my barrels of tanning chemicals and hides and any liability I would have if they were injured.

Other specific comments on the current proposal:

1. Some hunters bring me specimens to mount that have been in their freezers for several years or bring me old mounts to clean/repair, and no longer have the hunting license/tags. I sometimes mount old sets of horns with replacement capes that I have purchased or was given by friends or relatives and do not have licenses/tags for. This needs to be addressed in this regulation.
2. I'm a little confused about the requirement of inspecting paperwork and sealing documents. As an appointed sealer, all paper work is turned in to ADFG each month (there are no copies kept by the sealer), so there won't be anything to inspect most of the time.

If AWT has a problem with some taxidermists and appointed sealers "laundering illegal animals", I don't think this proposal is going to help solve this problem.

Sincerely,


Susan M. Wise-Eagle





United States Department of the Interior

FISH AND WILDLIFE SERVICE

1011 E. Tudor Road
Anchorage, Alaska 99503-6199



IN REPLY REFER TO:

FWS/OSM11097.CA

DEC 22 2011

Mr. Cliff Judkins, Chair
Alaska Board of Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Judkins:

The Alaska Board of Game (Board) is scheduled to meet January 13-18, 2012, to deliberate proposals concerning changes to Statewide regulations, Cycle "B" schedule. We have reviewed the 90 plus proposals the Board will be considering at this meeting.

The U.S. Fish and Wildlife Service, Office of Subsistence Management, working with other Federal agencies, has developed preliminary recommendations on those proposals that have potential impacts on both Federal subsistence users and wildlife resources. Our comments are enclosed.

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues. Please contact Chuck Ardizzone, Wildlife Liaison, at 907-786-3871, with any questions you may have concerning this material.

Sincerely,

Peter J. Probasco,
Assistant Regional Director

Enclosure

cc: Cora Campbell, ADF&G
Tim Towarak, Chair, FSB
Kristy Tibbles, Board Support Section
Jennifer Yuhas, ADF&G
Interagency Staff Committee
Chuck Ardizzone, OSM

**TAKE PRIDE
IN AMERICA** 



RECOMMENDATIONS

ALASKA BOARD OF GAME PROPOSALS

**Statewide Regulations
Cycle B Schedule
January 13-18, 2012
Anchorage, Alaska**

U.S. Fish and Wildlife Service Office of Subsistence Management (OSM)



evidence regarding the potential impacts to wild sheep and goat populations in Alaska. A recent risk assessment of the transmission of disease from domestic species to Dall's sheep and mountain goats in the Northwest Territories found "that contact between domestic sheep or goats and wild Dall's sheep or mountain goats would likely result in significant disease in the wild species with substantial negative and long term effects on population dynamics and sustainability."

Garde, E., S. Kutz, H. Schwantje, A. Veitch, E. Jenkins, and B. Elkin. 2005. Examining the risk of disease transmission between wild Dall's sheep and mountain goats, and introduced domestic sheep, goats, and llamas in the Northwest Territories. *Other Publications in Zoonotics and Wildlife Disease*. Paper 29. <http://digitalcommons.unl.edu/zoonoticspub/29>. Accessed 16 December 2011.

Federal Position/Recommended Action: The OSM recommendation is to support the proposal.

Rationale: The OSM recognizes the importance of protecting Alaska's resources and important subsistence species from the introduction of diseases and the effects of invasive species; however, this issue has not been assessed through the Federal regulation process.

PROPOSAL 103 5 AAC 85.080. Unlawful methods of taking game; exceptions. Prohibit the use of felt soled wading boots while hunting game.

Current Federal Regulations: Currently there are no Federal hunting regulations restricting the use felt-soled wading boots.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal Subsistence users/wildlife: The prohibition of felt-soled wading boots could impact subsistence users by requiring them to purchase new gear; however the use of felt-soled wading boots has been associated with the introduction of invasive species, such as didymo (*Didymosphenia geminata*), mycospores of the parasite that causes whirling disease (*Myxobolus cerebralis*), and New Zealand mudsnails into aquatic environments. Introductions of invasive species could result in significant impacts to habitats and subsistence resources in Alaska.

Federal Position/Recommended Action: The OSM recommendation is to support the proposal.

Rationale: The OSM recognizes the importance of protecting Alaskan environments and important subsistence species from the effects of invasive species; however, this issue has not been assessed through the Federal regulation process. It is recognized that field gear is a potential pathway for transmitting invasive species and therefore the OSM supports educating hunters who



Impact to Federal Subsistence users/wildlife: The elimination of the evidence of sex requirement could result in the increased harvest of protected sex classes, which may negatively affect the sustainability of harvested populations under current regulations. Females of many game species are protected due to their higher reproductive value to populations. Without an evidence of sex requirement, enforcement of sex-restricted regulations are difficult to enforce.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** the proposal.

Rationale: The regulation to require users to keep the evidence of sex on harvested animals is an important tool to enforce harvest regulations, especially when certain sex classes are protected to maintain or increase harvested populations. The proponent's suggestion of using DNA analysis to determine the sex of harvested individuals is impractical due to the cost of processing tissue samples and the increased time associated with determining the sex of an animal.





STATE OF ALASKA
DEPARTMENT OF
COMMERCE
COMMUNITY AND
ECONOMIC DEVELOPMENT

Big Game Commercial Services Board

December 19, 2011

Kristy Tibbles
Executive Director, Board of Game
PO Box 115526
Juneau, AK 99811

RE: Proposed change to 5 AAC 92.135(d)

Dear Director Tibbles:

The Big Game Commercial Services Board during its December 2011 Board meeting proposed a change to 5 AAC 92.135(d).

The Board has proposed 5 AAC 92.135(d) be amended to read...If person in possession of the game is an employee of a licensed transporter or guide-outfitter, this requirement may be satisfied by a statement signed by the person who took the game on the day that person who took the game was transported from the field.

Thank you,

Paul Johnson, Chairperson
Big Game Commercial Services Board

CS/pj/December 2011 BGCSB Proposal to Board of Game



29 September 2011

RECEIVED

OCT 12 2011

BOARDS

Mark W. Gordon

7950 Duchess Drive

Palmer, AK 99645

ATTN: BOG Comments

ADFG

Boards Support Section

P.O. Box 115526

Juneau, AK 99811-5526

Ladies and Gentlemen:

Please accept these comments on the proposals to be considered during the Cycle B, Alaska Board of Game meetings scheduled for November 2011 through March 2012:

Proposal #48; Prohibit the sale of bear parts harvested on National Park Service lands:

I oppose this proposal. The proposer states that: "Such manipulation is contrary to the management policies of the National Park Service and cannot be allowed on park service managed lands." This is self-contradictory. If hunting is allowed, hunting management must be allowed, and the sale of bear parts is a management tool used to achieve a management goal. More, the proposer (Mr. Jim Stratton, now representing the National Parks Conservation Association) has a history in Alaska of leaning toward the goals of environmental organizations or lobbies even when a state official. He now obviously represents an environmental organization; which will advocate more toward preservation than comprehensive, macro game management. This issue also merges into the questions brought forth by GMU Area Biologist Bob Tobey in the 2007 Brown Bear Management Report regarding the immigration of brown bears from both Denali National Park and Wrangell St. Elias National Park into GMU 13. A study of the immigration of predators from no-hunting areas like the national parks into hunting areas is due before more preservation measures in national preserves is allowed. I believe this is an attempt to severely restrict or end hunting on national preserves.



Proposal #51; Allow the ADFG to require the latitude and longitude of kill locations on a harvest report for drawing and registration hunts:

I do not oppose this proposal. I fully understand the reason why the department would want this information and agree that it would be a great help for all hunts, general as well as drawing, registration, and subsistence. My problem is that when the department first posted harvest look up data on line, the drainage harvest data was included. It is no longer a look up query option. I suspect it was removed because of pressure from a few hunters who thought their "secret spot" would be revealed. That is public data, and researchers might want that information for a variety of reasons. It should be included as a query option again.

Proposal #54; Expand the definition of bow to include crossbows:

I strongly support this proposal. There is no reason why to exclude the use of crossbows from archery only hunts. They are just as well suited for hunting as compound archery equipment. They would also allow many persons listed by the proposer (disabled, young, aged, etc) to participate in archery only hunts. Crossbows are considered archery equipment and archery history. The only difference is that they are mechanically drawn.

Proposals #53 & 55:

I support these proposals. Since I support Proposal #54, which would include crossbows as legal archery equipment, I support the need to adopt crossbow standards which would define which crossbows would qualify.

Proposal #56; Adopt crossbow standards and allow disabled hunters to use crossbows in archery hunts:

I oppose this proposal. While I support the adoption of crossbow standards, I oppose the limitations on their use for only "disabled" hunters. All should be able to use them.

Proposal #62; Restrict the number of drawing permits a resident may apply for:



I support this proposal, although I will concede to Proposal #63 from the department to increase the number of application options to 6 rather than 5 as this proposal suggests.

Proposals #64 & 65: Limit drawing permits to only two permits per year:

I support this proposal as long as Tier 1, Tier 2, and registration permits are not included in the limited number of total hunting permits a person can acquire.

Proposal #77: Require hunters to use only one type of method; either firearm or bow; require a tag:

I strongly oppose this proposal. This attempt to classify humans is going too far. I'm uncomfortable with all the proposals that suggest that are setting non-residents so far aside, as if we haven't learned from the subsistence morass and what it has done to Alaska. Now this? "Continued increase of people who are not dedicated to bow hunting will continue to hunt with bows"? No kidding? As more of these limitations exclude others, they will evolve with the exclusions. If you require people to hunt with pointy sticks, people "not dedicated to pointy sticks" will begin to hunt with pointy sticks. It is getting to the point where I'd like to propose that ridiculous proposals should be illegal to submit.

Proposal #92: Allow only the use of traps and snares for taking wolf and wolverine and prohibit the use of firearms except for dispatching trapped animals:

I strenuously oppose this proposal. The proposer states that: "Allowing a trapper to use the same methods to harvest wildlife as a hunter (i.e. free roaming wolf or wolverine harvested with a firearm) essentially invalidates the harvest management strategy established to manage harvest by sustained yield principles with a hunting license. Allowable methods and means regarding the legal take under a trapping or a hunting license must be separate and distinct to be effective. Especially regarding the harvest of wolverine, which can sustain virtually no human harvest pressure without nearby refugia that provides no hunting or trapping pressure at all."

This is utterly false. Trapping methods and means in no way "invalidates the harvest management strategy established to manage harvest by sustained yield principles." Shooting instead of trapping is harvest. Period. The trapping license essentially adds



the methods and means of traps as well as allows the sale of the fur. Indeed, bears need to be added to trapping regs as furbearers, especially brown bears, since so few brown bears are harvested for meat. They are harvested for their fur, thus they are a furbearer.

The proposer, Science Now Project!, is not utilizing science at all in their proposal. They're using the emotion typical of environmental zealots.

Proposal #93; Prohibit the use of artificial light for taking game on all lands managed by the National Park Service:

I strenuously oppose this proposal. The proposer states that: "Such manipulation is contrary to the management policies of the National Park Service and cannot be allowed on park service managed lands." This is self-contradictory. If hunting is allowed, hunting management must be allowed. More, the proposer (Mr. Jim Stratton, now representing the National Parks Conservation Association) has a history in Alaska of leaning toward the goals of environmental organizations or lobbies even when a state official. He now obviously represents an environmental organization, which will advocate more toward preservation than comprehensive, macro game management. It is clear that Mr. Stratton and/or his organization have teamed up with the like minded environmental group "Science Now Project!" in this crusade to narrow the methods and means of trapping, even with the term common with Proposal #92: "free roaming wolf and wolverine." I believe this is an attempt to severely restrict or end hunting on national preserves.

Proposal #98; Prohibit the use of hand held electronics in taking game:

I strenuously oppose this proposal. It is unnecessary and ideological in nature. The proposer answers the question "what will happen if nothing is done?" with, "hunters will depend more and more on electronics to do their hunting". So what? We also depend on weapons. Shall we do away with them, too? No guns, bows, crossbows, pointy sticks, etc? This is ridiculous. If the proposer wishes to hunt like a pre-Neanderthal, so be it. He should have no authority to demand everybody else to do so as well.

Proposal #100; Allow the use of laser sight, electronically-enhanced night vision scope, or artificial light for taking coyotes:



I strongly support this proposal. Coyotes aren't even originally native to Alaska, I believe they have significantly displaced foxes in many parts of the state, and they have the potential to expand their range and density even more if harvest is not increased. Indeed, I believe laser sights, electronically-enhanced night vision scopes, and artificial lights should be allowed for all species under a trapping license due to the fact that trapping seasons in Alaska are during the long, dark winters when there is little to no daylight throughout the day.

Proposal #107; Eliminate the statewide bag limit for black bear:

I support this proposal. Black bear should be managed by the unit, not statewide.

Proposal #108; Prohibit the harvest of cubs and sows accompanied by cubs on National Park Service lands:

I oppose this proposal. The proposer states that: "Such manipulation is contrary to the management policies of the National Park Service and cannot be allowed on park service managed lands." This is self-contradictory. If hunting is allowed, hunting management must be allowed. More, the proposer (Mr. Jim Stratton, now representing the National Parks Conservation Association) has a history in Alaska of leaning toward the goals of environmental organizations or lobbies even when a state official. He now obviously represents an environmental organization, which will advocate more toward preservation than comprehensive, macro game management. I believe this is an attempt to severely restrict or end hunting on national preserves.

Proposal #112; Eliminate the evidence of sex regulation:

I presently neither support or oppose this proposal, however I believe it has merit. It deserves careful and thoughtful consideration by the Board.

Proposal #113; Remove the reference to federal fish and wildlife agent under the transfer and possession regulation:

I strongly support this proposal, and I thank the Fairbanks Advisory Committee for proposing it. The feds have rudely inserted themselves into dual management. Let them do so without unnecessary and perhaps even illegal reference or assistance by the state.



Proposal #124: Require trap identification for all Units on lands managed by the National Park Service:

I strongly oppose this proposal. The proposer states that: "Current state trapping regulations, which are adopted for use on federal lands by federal regulation, don't require trap designation. To ensure that state trapping rules are adhered to on lands managed by the National Park Service, trap identification needs to be adopted for lands managed by the National Park Service." This makes no sense. If trap identification was necessary on federal lands to ensure that state trapping rules are adhered to, it would also be necessary on state lands. More, the proposer (Mr. Jim Stratton, now representing the National Parks Conservation Association) has a history in Alaska of leaning toward the goals of environmental organizations or lobbies even when a state official. He now obviously represents an environmental organization, which will advocate more toward preservation than comprehensive, macro game management. I believe this is an attempt to severely restrict or end trapping on national preserves.

Proposal #126; Prohibit the trapping of black bears in all National Park Service managed lands:

I strongly oppose this proposal. The proposer states that "the indiscriminate nature of any potential trapping/snaring of black bears is solely to increase the overall harvest of black bears and does not contribute to the fair chase hunt of animals for food or trophy purposes." First, trapping has nothing to do with "food or trophy purposes", and never did. Its historical purpose has been for the acquisition of fur for resale. Also, nothing is done on national preserve lands that is not being done on any other lands classified for trapping. More, the proposer (Mr. Jim Stratton, now representing the National Parks Conservation Association) has a history in Alaska of leaning toward the goals of environmental organizations or lobbies even when a state official. He now obviously represents an environmental organization, which will advocate more toward preservation than comprehensive, macro game management. I believe this is an attempt to severely restrict or end trapping on national preserves.

Proposal #127; Prohibit the taking of a black bear by trap or snare:

I strongly oppose this proposal. Bears are furbearers. Black bears are harvested as much for their fur as for their meat, and brown bears are almost universally harvested for their fur alone. Their fur sells well and for substantial prices. As the department



learns that bear harvest can rise with no threat to a sustained yield, taking them by trap or snare in appropriate areas should be allowed. The proposer is an environmental organization. I believe this is just another attempt to limit or end the harvest of bears.

Proposal #141; Implement black bear trapping regulations as follows:

I strongly support this proposal. Bears are furbearers. Black bears are harvested as much for their fur as for their meat, and brown bears are almost universally harvested for their fur alone. Their fur sells well and for substantial prices. As the department learns that bear harvest can rise with no threat to a sustained yield, taking them by trap or snare in appropriate areas should be allowed. Trapping and the sale of hides can be an effective management tool, and this experimental proposal at the request of the department is a good start.

Proposal #142; Prohibit trapping of black bear in the Interior region:

I strongly oppose this proposal. Bears are furbearers. Black bears are harvested as much for their fur as for their meat, and brown bears are almost universally harvested for their fur alone. Their fur sells well and for substantial prices. As the department learns that bear harvest can rise with no threat to a sustained yield, taking them by trap or snare in appropriate areas should be allowed. Trapping and the sale of hides can be an effective management tool. The proposer is an environmental organization. I believe this is just another attempt to limit or end the harvest of bears.

Proposal #147; Allow the use of helicopters for access to trapping in Region III:

I strongly support this proposal. Trapping is a commercial, not a sporting activity. The most efficient tools should be allowed.

Proposal #151; Review the conditions of the Controlled Use Areas in Region III and repeal those that are no longer meet the original intent:

I strongly support this proposal, and I thank the Fairbanks Advisory Committee for suggesting it. Indeed, this should be done statewide on a recurring basis. I believe many of the controlled use areas were created through pressure by specific users to keep competition out of an area, and this should never have been allowed to begin with.



Proposal #233: Establish a new controlled use area near Denali:

I strenuously oppose this proposal. This is a back door attempt to enlarge national parks/preserves in defiance of the "no more" clause of ANILCA. More, the proposer (Mr. Jim Stratton, now representing the National Parks Conservation Association) has a history in Alaska of leaning toward the goals of environmental organizations or lobbies even when a state official. He now obviously represents an environmental organization, which will advocate more toward preservation than comprehensive, macro game management. This is a recurring theme both near Denali National Park as well as Yukon/Charlie River National Preserve. It is, essentially, an attempt to claim "ownership" of "park animals" even when those animals leave the park. It needs to be nipped in the bud immediately.

Proposal #236: Allow limited harvest of grizzly bear at black bear bait stations in Units 20A, 20B, and 25C:

I strongly support this proposal in the proposed units. This is especially conservative if there is a one bear per four year limit. Brown bear baiting was already allowed in the southern portion of GMU 20E a few years ago, and success rates were very low. In those three years that it was allowed, only five bears were harvested. Clearly, bears are not being overharvested in this way.

I thank the Board of Game for accepting and considering my comments on the 2011-2012 proposals it is to consider.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Stratton".

Alaska State Legislature
House of Representatives
Representative Tammie Wilson

Interim
301 Santa Clause Lane
North Pole, AK 99705
Phone - (907) 451-2806
Fax - (907) 451-2332



Rep.Tammie.Wilson@legis.state.ak.us

Session
State Capitol
Juneau, AK 99801
Phone - (907) 465-4797
Fax - (907) 465-3884

October 19, 2011

Dear Committee Members,

I held a meeting with local taxidermists and the Commissioner this past August. It was made clear that the taxidermists who attended have cooperated with the AWT and will continue to do so. There was no evidence presented by LT. Chastain during the meeting that a real issue exists. I directly asked for specific documentation in which a taxidermist refused to work with an AWT officer. I was told no such documentation exists.

In considering both sides of Proposal 220, I find that it will unnecessarily burden small business. A log book would only create duplication of paperwork - taxidermists are already required to keep work orders on each item brought into their shops. New or more regulation would not prevent lawbreakers from breaking the law. The system we have in place works.

I would like to address the issues presented in the draft proposal of August 5, 2011. First, what will happen if nothing is done? It is stated that, "AWT will continue to have difficulty inspecting fish and game and compliance with regulations at licensed taxidermy businesses". Again, where is the documentation from AWT that taxidermists objected or refused to help an officer? Documentation has not been provided to date.

Secondly, it states that this will, "benefit all resource users and ADF&G by making sure illegal animals do not have a venue to disappear". This is another claim by AWT without documentation to substantiate their concern.

Finally, it states that the public will benefit through enforcement of this regulation. Please show me how this will happen, where is the list of licensed taxidermist this will catch breaking the law. We must have proof a problem exists before new regulations are proposed. The important fact, which is not being addressed in this proposal, is the unintended consequence of destroying a good relationship between taxidermists and AWT personnel.

If you have documentation of specific examples to substantiate such a regulation change, I would be open to reviewing it. With the lack of documentation, I am convinced current business records are sufficient. With all the inquires I have made, the only proof I have seen is that licensed taxidermists cooperate well with wildlife troopers. Therefore I believe Proposal 220 is unnecessary.

Sincerely,

Tammie

Rep. Tammie Wilson
907-590-7602

ALASKA STATE LEGISLATURE ~ REPRESENTATIVE TAMMIE WILSON



Attn: Board of Game Comments 12/23/11

Alaska Dept. of Fish & Game

Boards Support Section

907 465-6094

TOPIC: Bear Snaring

To Whom it may Concern

Bear Snaring has been illegal since statehood. I strongly urge you to ~~keep~~ IT ILLEGAL!

Bear snaring endangers persons who may wander near snares (baited snares). Bear snaring is inhumane. Why we should be oblivious to animal suffering is beyond me. Societies have long recognized a social responsibility to animal welfare (witness the ASPCA). It is highly questionable how "effective" indiscriminate snaring is in long term management of predator/prey. Furthermore, certainly sows and cubs will be snared along with bears.

For the sake of tourism, wild life management, human safety, and the bears, I strongly urge you to eliminate any and all bear baiting & snaring.

PETER HOLCK
2425 Juneau St.
Anchorage, AK 99508



Date: December 25, 2011

Fax: (907) 465 6094

Sent on behalf of hunter Aaron Pearsall
who is currently deployed in Afghanistan.

- > Subject: RE: Alaska Board of Game Proposal 99 (UNCLASSIFIED)
- > Date: Thu, 22 Dec 2011 19:50:19 +0430
- > From: aaron.pearsall@afghan.swa.army.mil
- > To: ak_explorer@hotmail.com
- >
- > Classification: UNCLASSIFIED
- > Caveats: FOUO
- >
- > Matt or Heidi,
- >
- > I'm unable to submit my comments to the board in time by fax from Afghanistan. I strongly object
- > to the idea you can't hunt the same day the water taxi drops you off.
- > Please pass these sentiments along.
- >
- > Thanks,
- > Aaron Pearsall



Steve Klaich
P.O. Box 5042
Nikolaevsk, AK 99556
December 26, 2011

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

To Alaska Board of Game:

I am writing to strongly support predator control, including aerial wolf hunting on the Kenai Peninsula. The need for this measure is clearly evident to those people that venture off of the road system and recreate in the backcountry of the Kenai.

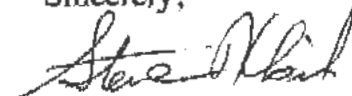
I have actively moose hunted in unit 15 C for the past 23 years and clearly noticed a dramatic change in the moose density and composition. Three years ago, my wife and I hunted unit 15 C and spent many days in the field. We counted 52 cow moose and two calves. Clearly with this many cows and only two calves, predators are making a huge dent in the moose population.

As an active snow machine rider, each year when I ride the backcountry from November-January I see a great deal of wolf sign in the snow. As the snow gets deeper, the wolf sign disappears and the wolves follow the moose to the lower wintering areas where predation is easier. During the earlier part of the winter, frequent sign of moose kills (by wolves) is clearly evident.

Obviously, current wolf harvest is not adequate to keep wolf populations in check and the moose populations are suffering. As a regular moose hunter that depends on moose meat to feed my family, I strongly urge the Alaska Board of Game to make a decision to initiate predator control on the Kenai Peninsula. I understand that "outside" environmental groups are trying to influence this decision, but I strongly encourage you to support wolf control and make the decision that is right and best for the game and human populations of Alaska.

Thank you!

Sincerely,



Steve Klaich



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

RE: Statewide Regulations Cycle B Proposal Comments

Dear Board Members:

I am an Alaskan resident hunter who is concerned about our game management in Alaska. I am unable to attend the January 13-18, 2012 meeting in Anchorage. Please accept my written comments as noted below.

Sincerely,



Charles K. Kahahawai
500 W. Gerondale Cir.
Wasilla, AK 99654

PROPOSAL 88 - 5 AAC, Chapter 85. - SUPPORT

The reason for the SUPPORT of Proposal 88, in my many years of sheep hunting I am starting to see the population of legal rams starting to diminish. I understand there are many contributions to this matter may it be disease, weather, predation etc. However, thru my experience in GMU 19C, an area I have hunted for years, (with minimal resident sheep hunting pressure), there are a number of multiple registered guides, with an unlimited number of non-resident sheep hunters. In the last few years, I have noticed that there has been a significant reduction of legal rams in the western Alaska Range. If nothing is done about this, we will see our residential sheep hunting opportunities and the future of it will be gone for ever. This proposal is in the best interest of the species, and as a resident sheep hunter I support it.



Dec. 27, 2011

To Whom It May Concern at AK Dept. of Fish & Game:

Please PROHIBIT the snaring of BEARS in the State of Alaska. I support Alaska's Center for the Environment proposal #127 Statewide and # 142 for the Interior.

I am not supportive of the current practices of the Board of Fish and Game to seek to minimize predator populations while expanding nonresident and commercial use of wildlife in Alaska. I oppose the widespread killing of bears and wolves in Alaska.

I do not appreciate the fact that this Board of Fish and Game is implementing regulations on management of black and brown bears in absence of biological justification and through the use of highly controversial harvest practices (like snaring).

You (Board of Fish & Game) have gone too far and we want our wildlife back!!!

Sincerely,

Meg Mitchell
Homer, AK 99603



Tim Sell
14441 Rocky rd.
Anchorage, Ak 99516
907-242-8654

- 23 Dec 11

Auth: Scott
Public Comment
BOG - SW

Dear Game board members;

My name is Timothy Sell. I am a active falconer in Alaska and have been since 1985. I have volunteered for the non-game section of ADF&G for several years doing raptor surveys in the northwestern part of the state and in Prince William Sound after the 1989 oil spill. All volunteer.

Thank you for the chance to comment on the current falconry proposals before you, the Alaska falconers association's version, #38 and the States version #39. I would prefer the #38 version. It is better thought out, having gone through many rewrites, and has been approved as meeting the standards set by the USF&W. The states version was hastily put together and turned in late (12/2011). The states has a lot of errors and is in question as to whether or not it could actually pass the USF&W's minimum standards.

Falconry has been over regulated for many years and time and time again everyone has agreed that we as falconers have no impact on either the raptor populations we acquire hunting partners from or prey population that we pursue. Over regulation loads the AGF&G with more paper work for no reason. Let's streamline the regulations! Please approve #38.

Thanks very much and good luck in your hectic schedule,

Tim Sell
Tim Sell

RECEIVED

DEC 27 2011

**BOARDS
ANCHORAGE**





Alaska Outdoor Council

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

December 27, 2011

Board of Directors

President
Bill Iverson
Soldotna

**Southcentral
1st Vice Pres.**
Mei Grove
Big Lake

**Interior
2nd Vice Pres.**
Ralph Seekins
Fairbanks

**Southeast
3rd Vice Pres.**
Richard Yamada
Juneau

Treasurer
Todd Clark
Anchorage

Secretary
Al Barrette
Fairbanks

At Large
Gary Stevens
Chugiak

Fund Trustee
Warren Olsen
Anchorage
Byron Haley
Fairbanks

**Executive
Director**
Rod Arno
Palmer

ADF&G
ATTN: Board of Game Comments
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
Fax: 907-465-6094

AOC Comments on AK Board of Game Statewide Regulations January 13 – 17, 2012

The Alaska Outdoor Council (AOC) is a statewide umbrella organization representing 50 clubs and over 10,000 Alaskans, who hunt, trap, fish, and recreate on public lands and waters. AOC representatives and many of our members attend AK Board of Game meetings statewide to help provide information regarding management and allocation of game for all Alaskans.

AOC appreciates the opportunity to provide written comments to the board prior to their deliberations on proposed changes in regulations under Title 5 AAC. AOC also appreciates it when board members refer to substantive public comments during their deliberation on each of these proposed changes to current regulations.

Proposal 41. Do not adopt. Game is a public resource which appears to be fully allocated statewide, each proposal to allow special uses to one group or another just intensifies the user conflicts already occur. **No additional seasons or bag limits** should ever be approved by the department for "cultural hunt" permits.

Proposal 42. Adopt. Contrary to the departments issue statement this isn't just a village problem. Habituation of wildlife causes safety problems around human settlements far more often than the very unusual occurrence of a pack of wolves running down a school teacher in a village. For that reason AOC does support this proposal.

Proposal 43. Do not adopt. At this time there is no shortage of beaver or wetlands for fish rearing habitat in Alaska. If an individual wants to finance a beaver flow device on their own private property as opposed to killing beaver that should be their prerogative.

Proposal 44. Refer to legislature for amendments to the statute. There are other problems with the statute that should be addressed by the legislature, like where can the

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



revenue that is generate be spent by the organization as well as by the department. What is the ratio of the revenue split between organizations and the department? Which departments can get the revenue, just ADF&G? What about the department of Public Safety?

Proposal 45. Amend and adopt. Amend to define what a "limited" amount of noncommercial exchange is. One person should not be allowed to exchange more game meat than their personal annual harvest limit. Nor should the meat leave the GMU in which it is harvested. It would **not** be in the best interested of all Alaskans to reinstate market hunting. Sharing is the tradition subsistence use that State statutes are trying to protect.

Proposal 46. Amend and adopt. At the very least it needs amended to prevent large-scale commercialization of trophy game animals.

Proposal 48. Do not adopt. Currently this isn't even an issue on any NPS lands. These proposals, like most of the proposals submitted by NPCA, are anti-game management proposals. Passages of this proposal would further divide regulations between those on Federal land and State lands making enforcement of regulation that much more convoluted than they already are. NPCA leadership are most likely just clearing other possible regulatory processes before filing litigation in federal court to force NPS to take over game management on NPS lands. The board should vote down all NPCA statewide proposals and force their hand. The sooner federal encroachment on game management regulations gets to the US Supreme Court the better it will be for Alaska.

Proposal 49. Amend and adopt. AOC has reviewed comments gathered from a number of interior taxidermists regarding their concerns of unnecessary duplications of information being asked for by the Alaska Wildlife Troopers (AWT) in their proposed taxidermists log forms. AOC echoes taxidermists concerns and supports recent amendments agreed upon by representatives of the industry and AWT. AWT should have the ability to inspect records kept by licensed taxidermy businesses. AOC awaits further information that will be provided to the board prior to deliberation to provide additional comments.

Proposal 50. There are a number of discretionary hunt conditions that AOC feels are inappropriate for the department to apply: (4) carrying an operative radio in the field (8) banning mechanized vehicle use (10) specifying types of firearms and ammunition to be used. (14) This condition is far to open for the department's interpretation of what information is necessary for resource conservation.

Proposal 51. Do not adopt. Really, is that precise of a location of a kill necessary for conservation purposes? Keep it a voluntary requirement on harvest reports.

Proposal 52. Adopt. Enforcement of drawing hunt permits for **all** hunters is critical. Obviously once hunter demand exceeds the harvestable surplus of a game population accurate reporting is necessary.



Proposal 63. Adopt. If statistics show that a large number of drawing permits are never used start increasing the number of drawing permits on those specific drawing hunts until the harvestable surplus is being taken.

Proposal 66. Do not adopt. Drawing hunts are not subsistence hunts, they are general hunts. There is a miss perception that public resources, game, belongs to Alaskan residents. Alaska statute does provide for a priority of some game species to provide a wildfood source and the board should deal with that on a regional bases, not statewide.

Proposal 69. Adopt. The departments continued efforts to subvert bonus point/preference systems drawing hunts is without merit. The system has broad public support yet the department continually comments that the administrative cost to the department would be significant. The department is not paying its own bills, hunters are. The board has time before the January statewide meeting to have the department prepare data showing the income from drawing permit applications at the current fee and their estimated cost implementing a bonus point drawing hunt. Let's see their figures and compare them to numerous western States that have implemented bonus point drawing hunts for decades.

Proposal 70. Adopt. Again, wild game is a public resource in the USA. Drawing hunts are general hunts allowing all American citizens the same opportunities. If the board is allowing resident military folks to defer their hunt drawing permits it seems only fare to extend that offer to nonresidents in the military.

Proposal 71 thru 74. Do not adopt. The proposer of proposal 71 is factually incorrect; Wild game resources **do not** belong to residents of Alaska. They are a public resource. AOC recommends that the "we need a head start hunter crowd" take their proposals to a friendly legislature to introduce legislation to achieve their goal. It will be important that any law passed by the legislature giving resident hunters a week head start on hunting seasons include a fiscal note to replace the 470% of funding for the Division of Wildlife Conservation that comes from the sale of nonresident hunting licenses and tags. Or raises the price of resident license and start charging resident hunters tag fees at a price high enough to achieve the same level of funding as that provided by nonresident license and tag fees. Also the bill should include provisions to make General Funds available to defeat anti-hunting voter initiatives, since most of that expense has been paid by nonresident hunters in the recent past.

Proposal 75 and 76. Defer to Regional schedules. AOC would be more included to support youth hunt drawing priority opportunities in areas in close proximity to large population centers on a case by case bases.

Proposal 77. Do not adopt. The sad reality of the consequence of creating general hunts favoring one type of hunting over another is apparent in this proposal. It's human nature to, whenever possible, have a hunting priority over other hunters. If hunters want to change methods of hunting to take advantage of early hunting seasons and areas restricted to short range weapons so be it.



Proposal 78 thru 85. **Do not adopt.** The board has the authority to limit the nonresident allocation of Dall sheep whenever hunter demand threatens the sustainable harvest levels of the population. AS16.05.255 (d) does not give resident sheep hunters a preference over non-resident hunters. Should the resident sheep hunters who need a head start group wish to pursue their preference they should ask a friendly legislature to introduce legislation to amend AS 16.05.255(d).

Proposal 87 thru 90. **Amend and adopt.** Amend to determine the allocation to nonresident sheep hunters based on board policy 2007-173-BOG. Amend to implement just a drawing hunt for nonresident sheep hunters in an area open to general hunts on a case by case bases during regional board meetings. These proposals have some merit but may require statutory changes to AS 16.05.255(d).

Proposal 91. **Do not adopt.** A nonresident is a nonresident regardless of whether he hires a guide/outfitter or not.

Proposal 92. **Do not adopt.** The proposer is factual incorrect; wolverine have been harvested for decades in Alaska without having areas closed to hunting for them to retreat to without eradicating them from any area of Alaska.

Proposal 93 and 94. **Do not adopt.** Once again the proposer of these proposals is just anti-hunting and trapping and anti-game management. The proposals are not based on fact nor is there a conservation issue.

Proposal 96. **Adopt.** Whenever short range hunting methods are required for public safety reasons all legal types of hunting that are short range should be allowed.

Proposal 97. **Do not adopt.** Again the proposer of this regulatory change is not addressing a conservation issue and is just anti-hunting and trapping.

Proposal 99. **Do not adopt.** This conflict between guide/outfitters and boat transports would best be handled by the BGCSB. The result of passage of this proposal would be to make it unlawful for boat transporters that also provide overnight lodging on multi-day hunts.

Proposal 100. **Adopt.** It's interesting how the department can justify regulations that would stop the spread of invasive species (proposal 103) but recommend do not adopt on this Delta AC proposal. As far as this being an enforcement problem, until the day comes that AWT start checking every hunter's scope to see if it has red dot equipped and sighting everyone for it, this exception should not be a problem. AWT didn't even



comment on this proposal being an issue to them.

Proposal 102. **Adopt.** Keeping infectious diseases and parasites out of Alaska's Dall sheep populations is of the utmost importance and far out ways the advantage of using pack animals for sheep hunting.

Proposal 104. **Defer until scientific evidence is provided.** Has deer or elk urine been documented to lead to the spread of CWD? Hopefully the department will provide the documentation at the board meeting.

Proposal 108. **Do not adopt.** Again, the proposer of this regulation is an anti-hunting/trapping advocate who opposes lawful hunting and trapping even if the practice has been established by traditional Alaskan native peoples. There is no biological concern for the game resource in question.

Proposal 118. **Amend and adopt.** The Great Alaska Black Bear Committee did an outstanding job of wading through the quagmire of regulations and discretionary permit conditions imposed by the department. Even the amend language found in the departments preliminary recommendations for this proposal appear reasonable.

Proposal 120. **Adopt.** Black bear baiting is a tool the board can use in areas where the black bear population is not being fully utilized within sustain-yield limits. Black bear reduction necessary to implement IM predator/prey game management should consist of methods in the boards Bear Conservation, Harvest, and Management Policy 2011-186-BOG that are not allowable under black bear baiting regulations.

Proposal 121. **Do not adopt.** Yet again the proposer of this proposal is an anti-hunting/trapping advocate who continues to misinterpret both State and Federal laws regulating hunting and trapping that do not jeopardize the sustainability of the black bear population.

Proposal 124 thru 127. **Do not adopt.** Yet one more time; the proposers of these proposals are anti-hunting/trapping advocates not interested in predator/prey management for the sake of prey populations or the people who derive high quality nourishment from a local renewable wildfood resource. What ever happen to "*think globally, act locally*" with these zealots?

Proposal 128. **Do not adopt.** The board should, in conjunction with AWT and members of the trapping community, creating a policy on incidental take of furbearers.



Proposal 130. AOC will provide comments on the IM plan for GMU26B at the January Statewide board meeting.

Proposal 131. AOC will provide comments on the IM plan for GMU19A at the January Statewide board meeting.

Proposal 132. Amend and adopt. 5 AAC 92.005(3) must first define what “new information” consists of and who is qualified to present it. Many times before the Board of Fisheries the department has opposed ACRs because they felt the new information was inadequate. As long as the Board of Game is prepared to adopt 5 AAC 92.005(2)(A)(B) and (C) , which is a modified version of the BOF ACR policy the hunting and trapping public should demand that the policy more clearly define “new information”.

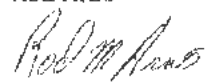
Proposals 14 and 19. Defer until DOS can produce accountable data on ANS for furbearers in GMU 18, 22, 23, 26A.

Proposal 18. Amend and adopt. Amend to statewide.

Proposals 35 and 36. AOC will provide comments on the IM plans for GMU 15 (A and C) at the January Statewide board meeting.

Sincerely,

Rod Arno


Executive Director
Alaska Outdoor Council

Bill Iverson


President
Alaska Outdoor Council



AD F&G		Date	12/28/11
Post-it® Fax Note	7671	# of pages	2
To	Board Support	From	shaw
Co./Dept.		Co.	
Phone #		Phone #	
Fax #	465-6094	Fax #	

December 27, 2011

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

Dear Alaska Board of Game,

We wish to emphatically **support Proposal #43**. This proposal is in two parts. The first part recommends that **beaver management in the State of Alaska be updated** to reflect a decade of new research which shows the value beavers provide to both fisheries and wildlife habitat. Such habitats include those that support significant species used by Alaskans such as **coho salmon and moose**. The sustainable productivity of Alaska's fisheries and wildlife is entirely due to and completely dependent on diverse and resilient ecosystems. The State of Alaska absolutely needs to update its approach to beaver management by being aware of this new research, conducting additional research and recognizing the importance of beavers to the continued productivity of fish and wildlife in Alaska.

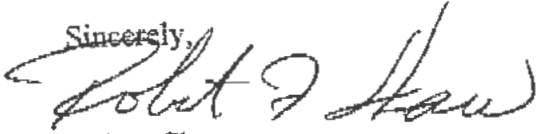
The second part recommends amending 5 AAC 92.041 to require that trapping outside of the season **require the consideration of beaver flow devices** as a more effective and appropriate alternative. We both have direct experience with the installation and functioning of such devices. They are easy to install and maintain. They have a track record of success and are now being utilized in Alaska. The Alaska Department of Fish and Game should become knowledgeable in their installation and use and provide them where necessary to protect property and fish and wildlife habitat. They should be utilized as the first option of choice and utilized in good faith before resorting to trapping in any situation involving property damage from beavers.

We also emphatically **oppose Proposal #35**. This proposal would institute "intensive management" in GMU 15A for aerial shooting of wolves. It would ignore Alaska Department of Fish and Game science showing that habitat is the limiting factor for moose in this area by scape-goating wolves and further squanders \$700,000 of the State's money on a flawed proposal. It is outrageous that this amount of money is being spent on this program when so many other legitimate needs exist for fish and wildlife management in the State. For example, there is a compelling need to eradicate a multitude of invasive species in Alaska, from *Elodea* infestations of ponds in Fairbanks and Anchorage that could spread further throughout the State to an invasive tunicate in Whiting Harbor near Sitka that is infesting a herring spawning site. The State is failing to adequately fund early responses to these habitat threatening invasions when it is cost effective and logical to do so, yet this illogical, ridiculously expensive and wasteful "intensive management" program is being promoted over the understandings of the State's own biologist. It would probably do more good to use the \$700,000 to farm moose or buy a cow for the complaining hunters than waste \$700,000 killing wolves in the hopes that it will miraculously produce more moose than the environment can support.

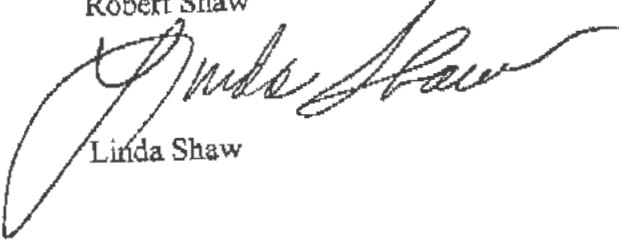
We hope you will act sensibly on behalf of the interests of Alaska's fish and wildlife and all Alaskans by **supporting Proposal #43 and opposing Proposal #35**.



Sincerely,



Robert Shaw



Linda Shaw

9684 Moraine Way
Juneau, AK 99801



28 December 2011

Dennis R Bishop
PO Box 374
Tok, AK 99780

Cliff Judkins, Chairman, and all Members
Alaska Board of Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
Fax: (907) 465-6094

Dear Chairman Judkins and Members of the Alaska Board of Game,

I live in Tok Alaska. I am a Master Falconer and have practiced the art since 1993.

I am asking that you:

1. **Adopt Proposal No. 38 in its entirety;**
2. **Reject Proposal No. 39;**
3. **Make any additions or amendments using Proposal No. 38 as a starting point; and**
4. **Reject Proposal No. 40.**

1. Adopt Proposal No. 38 in its entirety.

Briefly, the AFA proposal

- a) met the Board's April 2011 deadline;
- b) is complete and was created with the Department's input; and
- c) has been reviewed and approved by the Service.

All parties involved agree falconry is not only unique, but it exerts no measurable impact on either wild raptors or their quarry. Falconry is biologically insignificant.

In 2008, the US Fish and Wildlife Service announced it was no longer directly managing the nation's falconry program. They passed falconry's administrative burdens to the individual states but retained their authority to oversee each state's falconry program and the ability to enforce the federal rules. The Service substantially changed the overarching regulatory structure governing the sport. Among other things, they eliminated the existing jointly issued federal-state permits in favor of state-only permits. Notably, the Service required each falconry state to bring its regulations into line with federal standards by January of 2014. If a state failed to do so, falconry would no longer be allowed as a legal method of hunting in that state. There



will be no exceptions, no excuses, no grace periods, and no extensions. Consequently, if we fail to act at your upcoming meeting, falconry will become illegal in Alaska.

The Service has reviewed that draft; Dr. George T. Allen, Chief of the Permits and Regulations Section of the Service's Division of Migratory Bird Management, informed them it met their minimum requirements.

2. Reject Proposal No. 39.

The Department's proposal No. 39, largely due to its version of *Manual No. 9* is inadequate. I urge the Board to reject it.

The Department's version of *Manual No. 9*

- a) was introduced more than seven months past the Board's deadline;
- b) is incomplete and contains many errors and omissions; and
- c) has not been reviewed and approved by the Service.

If AFA had presented a proposal in December, it would not have been allowed into consideration. I urge the Board to apply the same standard to all players and reject the Department's version of the *Manual*, Proposal No. 39.

A review has found at least four formatting errors, 11 internal discrepancies, 21 items needing correction, 44 omissions, at least 55 significant questions raised by the Department's proposed changes, and 61 typographical/grammatical errors.

Beyond the extensive work required to repair the Department's proposal, I am especially concerned that the Service has not reviewed and approved it. If the Board was to adopt Proposal No. 39 and the Service later found it inadequate, falconry in Alaska would be in serious peril. I feel we cannot afford to risk losing the entire sport by adopting Proposal No. 39.

3. If necessary, make additions or amendments using Proposal No. 38 as a starting point.

I recommend the Board reject Proposal No. 39 and use the AFA's Proposal No. 38 as a starting point, and address the minor changes at the January meeting.

The members of the Alaska Falconers Association are in substantial agreement with the Department on the new federal regulations. The exceptions include:

- a) the list of species available for use by falconers;
- b) annual reporting; and
- c) sterilization of non-indigenous goshawk subspecies.

A) the list of species

The overall philosophy is that if the federal government allows it, and there's no biological reason against a small take of birds from the wild, we ought to allow the species the feds allow. The species list in our proposal takes the federal list, which includes virtually every bird of prey



species in North America, from California condors and hook-billed kites to crested caracaras and elf owls, and narrows it to those species that occur naturally in Alaska, as catalogued by the University of Alaska Museum.

The proposed list includes, with the Department's approval, five raptor species not indigenous to Alaska: Cooper's hawk, Harris's hawk, ferruginous hawk, prairie falcon, and aplomado falcon. These species are popular among falconers in the Lower 48 states, and would provide additional hunting opportunities to Alaska falconers. For example, the Harris's hawk is well-known as a species with a particularly agreeable temperament and a willingness to pursue a wide variety of quarry. This bird, along with the other four temperate zone raptors proposed, is extremely unlikely to survive in the Alaska wild if lost.

I also recommend adding the phrase "including all subspecies thereof" to the list of species allowed for falconry. With the availability of birds trapped as migrants in other states and the expanding role of captive propagation as a source of falconry birds, Alaska falconers have access to subspecies or mixes of subspecies that may not occur, or occur rarely, in the state. I share the Department's conclusion that the occasional raptor of a non-Alaska subspecies or mix of subspecies flown in falconry constitutes no threat to Alaska's wildlife. Our practice of falconry depends on healthy wild raptor populations. We wouldn't have recommended this if we had believed otherwise.

B) Annual reporting

I believe this is unnecessary; the Proposal No. 38 eliminates this annual report.

Under the Service's new rules, the 3-186A is still required in all of the circumstances mentioned above, but that form would be filed only with the state. Electronic filing and a new federal data base should make that process easier and the information more accessible to state managers. Since the Department will continue to receive prompt notification on falconry activity, we believe with proper cataloguing and manipulation of these data, the Department could effectively monitor falconry activity without requiring each falconer to complete an additional report each year.

As far as we are aware, the Department has never used and does not anticipate using these data to do anything, such as directing raptor take or setting falconry hunting seasons. Hard copy annual reports from every licensed falconer means Department personnel must manually enter these data. That's more work for the Department and more opportunity for data entry error. There is no reason to require this additional reporting.

C) Sterilization of non-indigenous goshawk subspecies

The Department is concerned about falconry use of European subspecies of goshawk, fearing an escaped bird could survive and breed in the wild, to unknown effect. This is possible, but with required use of radio transmitters, the chance of permanent loss to the wild is low. Moreover, the monetary outlay required to secure such a bird from a raptor breeder provides a strong incentive to bring a bird home at the end of each day.



The Service sees no threat in allowing European goshawks to be flown by falconers anywhere in the country.

I'd like the Board to consider behavioral sterilization as a viable method to contain the remote possibility of non-indigenous goshawks breeding in the wild. Goshawks imprinted on humans will not recognize other birds as potential mates and will not breed with them.

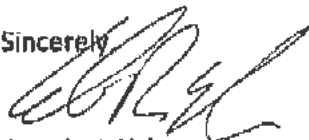
4. Please reject Proposal No. 40.

I would like to urge the Board to reject Proposal No. 40.

Thank you for your time and attention and for your service to Alaskans. I realize falconry is an obscure practice and not generally well-understood by otherwise experienced hunters and outdoor enthusiasts. But for a handful of dedicated Alaskans, it is the central activity of their lives. Thank you for making it possible for us to enjoy hunting with our raptors.

A member of AFA will be testifying before you at this upcoming meeting. He will be speaking on my behalf and with my full support.

Sincerely,



Dennis R Bishop



I support non-resident take in ALL states including my home state of Georgia. Georgia also reciprocates this priviledge with those states that also allow non-resident take by it's residents. Thank you for your consideration.

-David Hampton



Lars J. Sego

114 Don Quijote Ct
Corrales, NM 87048
(505) 883-9100
lsego@dbabq.com

December 28, 2011

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

Fax : (907) 465-6094

Re: Support for non-resident take proposal, "Proposal 40-5 AAC 92.037"

Dear Board of Game,

Please accept this letter of support for the proposed non-resident raptor take. As an avid hunter, fisherman and falconer I have been to Alaska on three previous occasions to hunt and fish. The average cost for each of those trips was well over \$10,000, most of which was spent in the local Alaskan economy. I hope that Alaska will adopt a non-resident falconry take similar to the one we have here in New Mexico. If and when that happens I plan to apply for a non-resident take permit and will again spend well over \$10,000 in your local economy for such a trip.

Since the United States encompasses such a varied array of geography, game and non-game species it is simply good management to allow non-residents to enjoy the numerous natural resources that are found throughout this great nation. We have worked hard to provide non-resident raptor take in New Mexico with reciprocity to other states that do the same and it has been a positive decision for all aspects of our state and its citizens.

I am a CITES registered breeder of Peregrine and Gyr Falcons. Since the Gyr Falcon does not nest in the lower 48 states, this would also provide a great opportunity to specifically expand the genetic gene pool in the captive Gyr Falcon stock that UFWFS licensed raptor propagators are using currently. In addition to providing a genetically diverse captive breeding population in the United States this policy would also reduce some of the current pressure for illegally taken wild Gyr Falcons worldwide.

In summary a non-resident take would have a positive impact upon; the Alaskan economy, the CITES registered raptor propagation program, the UFWFS raptor propagation program and the worldwide population of Peregrine and Gyr Falcons in particular.

If you have any questions please feel free to contact me.

Sincerely,



Lars J. Sego

CITES #A-US-507, UFWFS MB020303-0, NMG&F Master Falconry Permit #38



Stout, Keri

To whom it may concern,

Here we are watching the people in power, trying to cover up their past mistakes, by blaming something else ! A sure case of too little, too late, and once again , mismanagement of our natural resources.

But we have to blame SOMETHING, right ? Can't be a human problem. We have to make it look like we are taking care of the issues at hand, because we are the ones responsible. So we will attack this issue aggressively, and just do anything to make it look like we are doing something. Even if it doesn't have any positive affects, at least we are doing SOMETHING !

But, but, but, where are all these wolves who are supposedly doing all this destruction of moose ?

Do wolves prey on moose ? Yes. But how many ? How often ? What's happening to the moose in the areas where there are few if any wolves ?

Human population and pressures are rising constantly, every day, and year after year. What are the effects of increased human activities, and increased hunting pressure, and increased interests in out of state hunting, where the real money is ? After all, that IS what drives most of the decisions that the Board of Game makes isn't it, money ? Not real and sensible wildlife management, not regulation of human affects, development, or the natural rise and fall of animal populations.

We have already seen a real decline in available browse for the moose. I guess no one noticed while it was happening, but it has in fact happened, and moose have little if anything to feed on in winter. What are we doing about THAT problem ?

What about road kills, which seem to rise, or at least hold steady, every yr, due to more vehicles. What has been done about THAT problem ? (Responsible for HUNDREDS of cows and calves killed every year.)

How about loose dogs killing moose calves ? More people mean more dogs, and more loose dogs.

How about poaching ? I would dare to guess, with increased human population, there is an increase in poaching also. People have to get their moose.

How about the late subsistence hunts that go on every year ? The remaining bulls SHOULD be able to relax in the middle of the rut, and go about the business of breeding cows. Every year we see more and more barren cows in spring. Why is that ?

Every year we see more late calves, born small and under weight. Why is that ? And what is the survival rate of those undersized calves ?

Every year we see under age bulls chasing cows around. If they are the ones breeding those cows, what are the checks and balances to be sure they are genetically fit to be breeding ? Where are the larger and superior bulls ? Are there any left ? My guess is, not many.

I can see the writing on the wall. First we'll attack and kill all the wolves, and when THAT doesn't work, we'll start to eliminate all the bears, at least we'll have lots of increased revenue from selling more bear tags, and it will buy us more time to decide what we can do next.

People will come to our great state to see the wildlife, and we'll have to say ; " Sorry, but we killed them all. "

And the moose will still be suffering from over hunting, road kills, loss of habitat, and all the other human interferences which are plaguing them now.

We have come to the time where people can no longer expect to have everything they want. Eliminating all of the competition will not solve the problem. It will only act as a decoy to get the pressure off of those who are really responsible for the declining moose population.

Sincerely,

Keri Stout



Attention Board of
Game Comments.....

I Patricia Rodriguez
am against the killing of
wolves. I believe they
should be protected
for the future. Killing
of wolves should be illegal!



David Frank
P O Box 939
Ranchester, WY 82839

Alaska Dept. of Fish and Game
Attn: Board of Game
Boards Support Section
P. O. Box 115526
Juneau, AK 99811-5526
fax number: (907) 465-6094

28 December 2011

Re: Support of Proposal 40-5 AAC 92.037

Gentlemen,

I am in favor of a non-resident take of raptors for falconers from the lower 48 states. These resources freely travel from state to state and this should not be prohibited.

Sportsmen from other states may purchase a non-resident hunting license in Alaska and this is no different. The biology of the issue supports a non-resident take.

Thanks for you time and consideration,

A handwritten signature in black ink, appearing to read 'D. Frank', with a horizontal line extending to the right.

David Frank
Wyoming, USA



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

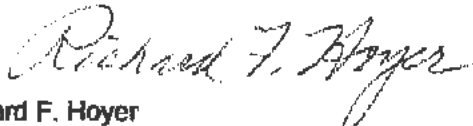
12/28/2011

Dear Board Members:

As a Wildlife Science graduate (O.S.U. '55) and falconer, I urge the board to approve non-resident take of raptors in your state for falconry purposes.

In recent years, three apprentice falconers from Alaskan traveled to Oregon in order trap immature Red-tailed Hawks. Two of those individuals staid at our residence in Corvallis, Oregon. Mike Houser of Anchorage came in late October 2008 and returned to Alaska with 'Snowflake', an immature female Red-tail. In November, 2009, Rio Berggren of Kodiak did the same thing and returned with an immature female Red-tail. Noteworthy was that both Mike and Rio were successful in taking Snowshoe Hares with their hawks.

Approval of non-resident take of raptors is win-win situation and would be similar to non-resident hunting and fishing that has been of benefit to Alaska for decades.



Richard F. Hoyer
2121 N.W. Mulkey Avenue, Corvallis, Oregon 97330
541-752-6888
charinabottae@earthlink.net



To: Alaska Board of Game [fax 907-465-6094]

2 pages faxed

From: Jim Herbert [POB 1461, Seward, AK – 907.224.8000]

Date: December 28, 2011

Re: **Proposals 38, 39, & 40** in Alaska Board of Game 2011/2012 Proposal Book, Arctic, Western, and Interior Regions and Statewide Regulations, Cycle B Schedule - Falconry Regulations

Opposed to Proposal 38, 5 AAC 92.037, Permits for Falconry, Section (f) addition of new raptor species legally available to falconers.

I support deletion of (1) turkey vulture, (2) osprey, (3) bald eagle, (4) white-tailed eagle, (5) Steller's sea eagle, (7) Asiatic sparrow hawk, (9) Cooper's hawk, (11) Harris' hawk, (12) Swainson's hawk, (14) Ferruginous hawk, (17) Eurasian kestrel, (20) Aplomado falcon, (23) Prairie falcon, (24) Western screech owl, (26) snowy owl, (27) northern Hawk-owl, (28) northern pygmy owl, (29) barred owl, (31) long-eared owl, (32) short-eared owl, (33) boreal owl, (34) northern saw-whet owl

Reason: This language may be consistent with that found in other falconry regulations in the lower 48, but is very inappropriate for Alaska. None of the above bird species should be allowed to be taken from the wild for falconry purposes. Species that are not indigenous to Alaska are very rare birds in Alaska and should not be subjected to taking from the wild by falconers. While Bald Eagles are common, using them for sport seems somehow unpatriotic. Owls, including native and rare owls, seem inappropriate species for falconry purposes, especially those that are nocturnal hunters. Any species of concern should certainly be deleted from this list.

Opposed to Proposal 39, 5 AAC 92.037, Permits for Falconry, Section (f) addition of new raptor species legally available to falconers.

(4) Swainson's hawk, (12) northern hawk-owl, (13) snowy owl, (15) non-indigenous species: Harris' Hawk, Cooper's hawk, Ferruginous hawk, prairies falcon, Aplomado falcon for the same reasons as above.

Opposed to Proposition 40, 5 AAC 92.037, Permits for Falconry, Allow nonresident falconers to capture wild Alaskan raptors.

Basically there is little to be gained by the State of Alaska or its residents by allowing non-residents to remove raptors from our state. If falconers from other parts of the country and potentially the world want North American raptors they can be obtained from captive breeding programs. I would suspect that even Alaskans that take nestlings are often taking them from relatively accessible



areas which typically are also heavily used by tourists and birders. It seems the proposal seeks to create a high end harvesting adventure for non residents. I wonder at the oversight of this program and the potential for abuse. No doubt the intentions of the proposers are good, but I see the potential for abuse and possible black market dealings.

Alaska markets itself as the last frontier and a wild place less tainted by modern society. It would be a pity to erode that image by removing one of the symbols of that wildness. Our raptors are rare and important parts of our wild ecosystems.

I urge the Alaska Board of Game to delete the new species from the raptor list, and keep wild raptor take closed to non-residents. There is much to lose and little to gain from these proposals.

Please note my opposition as stated to Proposals 38, 39, and 40.

Thank you for your work on the Board of Game



JAMES W. NELSON
PO BOX 211
UNALAKLEET, AK 99684
(907) 624-5214

To the Alaska Board of Game:

I am writing in support of the Alaska Falconers' Association proposal #38.

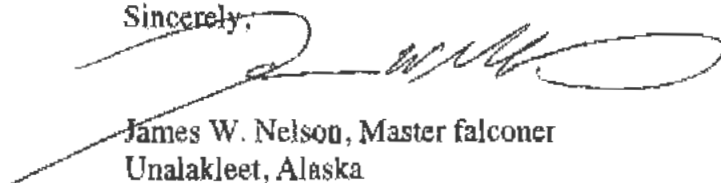
I am an Alaska master-class falconer who has been practicing falconry under legal permit since 1969. I began as a youth in Washington State, and have trained and hunted with most falconry-raptor species in Washington, Alaska and Oregon nearly continually over a period of over 40 years. I am also a licensed raptor breeder with extensive experience breeding aplomado falcons in the Lower 48, and I am a licensed abatement specialist and co-owner of American Bird Abatement Company. I have authored numerous articles on falconry and falcon training over the years, and I am currently publishing a treatise on hoodmaking. . By profession, I am an educator, for 30 years, primarily teaching secondary (high school and middle school) biology, but have worked extensively with teacher trainer as well.

Because the discssion amongst the Alaska falconers has been so through and extensive, and because we have also been in direct discussion with ADF&G, and there will be members of AFA personally representing our group at the Board meeting, I will not take a great deal of time presenting my own thoughts, which vary only slightly from those of the group.

In a nutshell, I favor the AFA proposal because it well written and provides a realistic balance between the Federal falconry guidelines, now in place at the federal level, and the philosophies of Alaska wildlife management, which the leadership of the AFA is keenly aware of and doing its best to accommodate within reason. My personal position is that the federal guidelines should be adopted as close to the way they are written.

Thank you very much for taking time to review my remarks and note my position.

Sincerely,



James W. Nelson, Master falconer
Unalakleet, Alaska



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

I am writing today to convey my comments on the upcoming proposals 35, and 36.

These proposals provide authorization for the airborne killing of wolves in two Game Management Units on the Kenai Peninsula. I believe that they are simply an anti-science "gift" to the special interest commercial hunting organizations, and were requested by the BOG itself, not Alaska Department of Fish and Game biologists.

-The ADF&G's own research clearly shows that in GMU 15A habitat is what is limiting moose populations, and even if wolves are killed the moose will still have far too little to eat.

-In GMU 15C, moose population goals have been met and the killing of wolves would constitute a blatant attempt at game farming. The result would be significant negative impacts on the integrity of the ecosystems.

-Another issue in 15C is the well-documented sustained peak in the hare population. When the hare population is this high they constitute a major part of the wolves' diet. Therefore, killing wolves would be counter-productive because hares feed on the same willows which are a staple food supply for moose.

The Kenai Peninsula is a world-renowned, year-round recreation area for Alaskans and visitors alike, myself and family included, and supports several population centers. Indiscriminate aerial wolf hunting would be contradictory to the lifestyle and economy of this area and should be rejected outright.

My family and I would undoubtedly be opposed to spending our tourist dollars in a state and area that indiscriminately and mercilessly murders native, wild wolf populations, which we come to observe and enjoy.

Thanks you for considering my comments.

Doug Lenler
5720 Costello Ave
Valley Glen, CA 91401



Dec 28, 2011

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

I am writing today to convey my opposition to the upcoming proposals 35, and 36. These proposals provide authorization for the airborne killing of wolves in two Game Management Units on the Kenai Peninsula. I believe that they are simply an anti-science "gift" to the special interest commercial hunting organizations, and were requested by the BOG itself, not Alaska Department of Fish and Game biologists.

-The ADF&G's own research clearly shows that in GMU 15A habitat is what is limiting moose populations, and even if wolves are killed the moose will still have far too little to eat.

-In GMU 15C, moose population goals have been met and the killing of wolves would constitute a blatant attempt at game farming. The result would be significant negative impacts on the integrity of the ecosystems.

-Another issue in 15C is the well-documented sustained peak in the hare population. When the hare population is this high they constitute a major part of the wolves' diet. Therefore, killing wolves would be counter-productive because hares feed on the same willows which are a staple food supply for moose.

The Kenai Peninsula is a world-renowned, year-round recreation area for Alaskans and visitors alike, myself and family included, and supports several population centers. Indiscriminate aerial wolf hunting would be contradictory to the lifestyle and economy of this area and should be rejected outright.

My family and I would undoubtedly be opposed to spending our tourist dollars in a state and area that indiscriminately and mercilessly murders native, wild wolf populations, which we come to observe and enjoy.

Thank you for considering my comments.

Doug Lenier
5720 Costello Ave
Valley Glen, CA 91401



Dec 28, 2011

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

I am writing today to give my support to Proposal 43.

Proposal 43 asks the BOG to update regulations regarding trapping "nuisance" beavers to control property damage. I believe that current regulations are outdated and fail to recognize the important role beaver habitat plays in healthy ecosystems for fish, birds and other wildlife. Specifically, current regulations fail to consider the installation of beaver pond flow devices as a method of preventing or alleviating property damage.

Therefore, I respectfully ask that you pass Proposal 43.

Thank you for considering my comments.

Doug Lenier
5720 Costello Ave.
Valley Glen, CA 91401



Dec 28, 2011

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

I am writing today to give my support to Proposal 127.

Proposal 127 would prohibit black bear snaring. The Alaska Center for the Environment submitted this well-researched proposal that I am asking you to support for the following reasons:

-Hundreds of bears have been killed over the past three years after being caught in a snare, including black bears, brown bears, sows and sows with cubs in this ADF&G "experiment".

-This indiscriminate and cruel practice is spreading throughout the state, and if the BOG approves this, *anyone* will be able to apply for a permit to snare bears.

-A recent scientific report shows independent scientists are concerned that Alaska is headed down the same path as every other state which once boasted healthy bear populations.

I consider the baiting and snaring of wild bears to be unconscionable, and would not choose to spend my tourist dollars in a state that practices this horror.

Therefore, I respectfully ask that you pass Proposal 127.

Thank you for considering my comments.

Doug Lenier
5720 Costello Ave.
Valley Glen, CA 91401



Rhonda Lanier
Oceanside, CA 92058
rhondarlanier@aol.com

December 28, 2011

ATTN: Board of Game Comments
Alaska Department of Fish and Game
Boards Support Section
Juneau, AK 99811-5526
By Fax: (907) 465 6094

Re: **Oppose Proposals 35 and 36 – Implementing aerial wolf killing on the Kenai Peninsula**

Dear Alaska Board of Game:

I am writing to the Board of Game to share my comments with you regarding the possibility of the BOG allowing the aerial hunting of wolves on the Kenai Peninsula. As someone who has fond memories of visiting my aunt and uncle years ago while they were living in Alaska, and having the opportunity to visit this incredibly beautiful part of Alaska, I am very saddened and angry to learn of the BOG's consideration concerning Kenai's wolves.

This consideration is all the more alarming as the ADF&G's own research show habitat in GMU 15A is responsible for the loss of moose population. They simply do not have enough food to eat, so killing wolves would serve no purpose whatsoever. In GMU 15C, the moose populations have been met, so to allow the killing of wolves would serve no purpose other than to satisfy the wishes of hunters in essence to establish a game farm.

It is also well documented that in 15C the hare population has a well-documented sustained peak, and are therefore a major part of the wolves' diet. The killing of wolves would in fact be counterproductive ecologically as hares feed on willows, which is a staple food supply for the moose.

In closing I would point out that the Kenai Peninsula is a well known, extremely popular year-round vacation and tourist area for Alaskans and visitors alike, with several population centers. Aerial wolf killing, if allowed, will be extremely controversial, and due to the heavy tourism in the area, quite visible. Is this truly the image you want to promote of Alaska?

Thank you very much for considering my comments regarding a part of Alaska that is very special to me.

Rhonda Lanier



From Gypsy Vanner

Pg 1 of 2

To: Board of Game Comments, Alaska Department of Fish and Game
 → Boards 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."



From: Gypsy Vanner

Pg 2 of 2

To: Board of Game Comments, Alaska Department of Fish and Game

→ Boards Support Section

October 25, 2011

Proposal 34/Unit 15C

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?

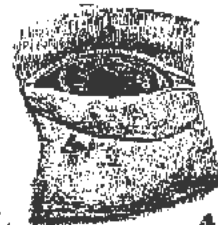
What is known in Unit 15C is it is a populated area and there is heavy use all winter by dog sled teams and other recreational users. There is already too much flight traffic. No studies have EVER been done on wolves in the area, just guesses. There seems to be a lack of concern that wolves as predators 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





Eye of the Whale
Marine Mammal Research

Alaska Board of Game
Fax # 907-465-6094

December 28, 2011

To Whom it concerns,

I am an Alaskan biologist. I have lived in Homer for the past 40 years. I have studied the humpback whales of Prince William Sound for 30 years. My study is based on being able to recognize individual animals over time. By documenting the individual whales through the years I have become familiar with their feeding habits, their associations, their rate of reproduction and their distribution.

I spend a lot of my free time riding horses in the Fox River valley and in the hills behind Homer...places where the wolf roams. I feel that the decision to hunt wolves (aerial hunt) is premature and a poor one. If we really do the research, recognize individual problem wolves, we may find that there are only a few specific animals that could be culled out. In reality, by more thoroughly studying their habits, groupings and population numbers we may find that the wolves are not the main problem here. But to randomly kill whole or parts of packs of wolves is very detrimental to the ecology of our precious wilderness.

I strongly oppose aerial wolf hunting on the Kenai Peninsula.

Sincerely,
Olga von Ziegesar-Matkin
Director
Eye of the Whale Research





CHUGACH STATE PARK CITIZENS' ADVISORY BOARD

HC 52 Box 8999, Indian, Alaska 99540 Phone: 907-345-5014 Fax: 907-345-6982

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

27 December 2011

Re: January 2012 Board of Game Proposals

I am writing on behalf of the Chugach State Park Citizens Advisory Board regarding new statewide regulatory proposals that will affect Chugach State Park. Please consider these comments during the winter 2012 Alaska Board of Game meeting.

The Chugach State Park Citizens Advisory Board assists park staff in an advisory capacity with park management and development issues. As an advisory board, our decisions are guided by the five primary purposes established in creating the park:

1. To protect and supply a satisfactory water supply for the use of the people;
2. To provide recreational opportunities for the people by providing areas for specified uses and constructing the necessary facilities in those areas;
3. To protect areas of unique and exceptional scenic value;
4. To provide areas for the public display of local wildlife; and
5. To protect the existing wilderness characteristics of the easterly interior area.

At approximately 495,000 acres, Chugach State Park is among the four largest state parks in the U.S. and comprises nearly half of Alaska's Game Management Unit (GMU) 14C. Most of the big game animals that inhabit GMU 14C use the park at least part of the year. The 15-member advisory board is appointed by the director of state parks and intentionally represents a wide variety of park users. With over 1.3 million visits to the park annually, we are interested in Board of Game regulation changes that may affect park resources and visitors.

We have carefully reviewed the winter 2012 Board of Game regulatory proposals that will affect the park's wildlife and users. The wildlife harvest and population estimates referenced in our comments are based upon input from the Alaska Department of Fish and Game. Our comments and recommendation for each proposal follow below. These recommendations passed unanimously during our December 19, 2011, meeting.

Proposal 44 – Oppose. The statute that authorized the Alaska Department of Fish and Game to issue up to two big game harvest tags through auction or raffle (AS 16.05.343[c]) does not address seasons, methods or means. Thus, the department already has discretionary authority to define seasons and methods and means for recipients of Governor's tags. However, the department's policy has been to limit any recipient of the Governor's tag to the seasons, methods, and means available to hunters without the special tag. The value of the tag is that it may be acquired without participating in the annual lottery like everyone else and the recipient is



not limited to a single hunting period, he or she may hunt during the entire open hunting season.

Allowing the recipient of the Governor's tag to hunt during a period closed to other hunters or, for example, allowing the recipient to use a rifle in an archery-only hunt area may increase the value of the tag to a person wealthy enough to outbid other hunters, but it will devalue the permits of all other hunters who hope to pursue the same species in that area. The Governor's tag recipient will have the first and best opportunity to shoot the largest Dall sheep ram or other trophy animal. Adopting this proposal may also cause conflicts with other users of the same resource. For example, hikers in Chugach State Park do not expect to encounter hunters outside of regular hunting seasons. Giving successful bidders for big game permits the advantages contemplated in this proposal would be unfair to others who hunt and recreate in the park.

Proposal 95 – Support. Currently, permitted falconers are allowed to hunt small game in most of Chugach State Park and surrounding areas. Only a handful of active falconers reside in the Anchorage area. We anticipate little or no conflict or concern with expanding this use in the Eagle River Management Area, including those portions of the management area within the park.

Proposal 109 – Oppose. This proposal would increase the bag limit for bear hunters in GMU 14C from 1 to 3 black bears per year. In recent years, black bear hunting has been expanded into previously closed areas in GMU 14C and the number of hunters has increased dramatically. As a result, more bears are being shot in Chugach State Park and surrounding areas. Hunters reported taking 201 black bears in GMU 14C during the last 4 complete regulatory years (from 2007-08 to 2010-11), an average of 50 each year. At least 60 more black bears were shot in defense of life or property or killed by vehicles during the same period, an average of at least 15 each year. GMU 14C has an estimated 200-300 black bears, so the annual human-caused mortality in recent years is 22-33%. The Alaska Department of Fish and Game has recommended not adopting similar proposals in recent years because the increasing black bear harvest in GMU 14C may be at or above a sustainable level.

Most of the hunting opportunity for black bears in GMU 14C is in Chugach State Park. Black bears are a desirable species in Chugach State Park. We do not support an unsustainable harvest of black bears in the park.

Thank you for the opportunity to respond to the regulatory proposals submitted for the winter 2012 Board of Game meeting. Please let me know if you have any questions regarding these comments and recommendations. I can be reached at 907-227-4125. Thank you for your consideration.

Sincerely,



Judy C. Caminer
Chair



Leave
the
Wolves
ALONE!

R. SABIN



Alaska Department of Fish & Game
Boards Support System
P.O. Box 115526
Juneau, Alaska 99811

December 29, 2011

Dear Chairman & Members of the Board:

I would like to comment on the following proposals:

Proposal #49 - OPPOSE - This proposal is to invasive and far reaching.

Proposal # 78 - OPPOSE - Proposal #78 through #85 are basically about the same topic to start the resident sheep season before the nonresident season. This will discourage nonresident sheep hunters from coming to Alaska, which will create a decline in much needed revenue for the state. It will also not achieve a goal of less crowing in the field and airports because guides will still be in the field at that designated time of the year.

Proposal # 79 - OPPOSE

Proposal # 80 - OPPOSE

Proposal # 81 - OPPOSE

Proposal # 82 - OPPOSE

Proposal # 83 - OPPOSE

Proposal # 84 - OPPOSE

Proposal # 85 - OPPOSE

Proposal # 87 - OPPOSE - There is no biological reason for this.

Proposal # 89 - OPPOSE - There is no biological reason for this.

Proposal # 90 - OPPOSE - There is no biological reason for this.

It seems as though the same individuals have written these sheep proposals and want to portray an image of unfair competition by guides. The reason nonresident guided hunters are more successful on guided hunts is that they work harder.

Sincerely, Joe Letarte, P. O. Box 16075, Two Rivers, Alaska 99716



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

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

December 27, 2011

Dear Chairman & Members of the Board:

On behalf of the nearly 1000 members of the Alaska Trappers Association, we wish to share our opinions on several proposals, which you will be considering during your January 2012 Statewide meeting in Anchorage.

We SUPPORT Proposal #18

We support this proposal because it will clarify the language of the current regulation, therefore allowing trappers and enforcement officials to both have a common understanding of the law.

Proposal #49 We would ask for deferment on proposal #49. We have some great concerns regarding the implications this may have.

We OPPOSE Proposal #92

Wolverines – The harvest of free-range wolverines taken by firearms is so low statewide that it does not increase the harvest to a threshold level.

Wolf – No biological data to support facts.

We OPPOSE Proposal #93

We oppose this for the same reasons stated on proposal 92. Not biologically supported and neither animal is a keystone species.

We OPPOSE Proposal #97

The Board addressed this topic two years ago as a way to accommodate a practice which has been traditionally used in rural parts of the state, and it was approved. Let's allow the Board of Game process to work as it is intended. This proposal would have the unintended consequence of making it difficult for trappers to dispatch some animals after dark.

We OPPOSE Proposal #124

Having trap tags does not work for its intended purpose. Traps and snares can be



stolen and used by others with the trap tag of the former trapper still attached. A member of our Board of Directors has experience with trap tags in the Lower 48 being stolen and used illegally.

Trap tags can break off, rust off, or fall off once an animal is trapped. Some trappers have hundreds if not more snares and traps that remain in the woods, it would be a hardship for trappers to have to tag all the gear they already have in the field.

Trap tags will only be used by honest trappers, and will not limit any of the illegal trapping that they are meant to curtail. ATA is not only opposed to trap tags, but we are also opposed to the implementation of BMP's (best management practices) in Alaska.

We OPPOSE Proposal #125

A trap check law has no place in Alaska due to the weather and extreme situations we have here. For a trapper to have to get an "extension" for a trap check because of weather would not only be a hassle, but impossible for some trappers who are so remote they can't call in and get an extension. This would cause trappers to go out in conditions that are unsafe in order to follow the law, in turn putting themselves and potential rescue personal (including NPS members) at risk.

We OPPOSE Proposal #126

Allow the state Board of Game to make decisions regarding harvest methods and means. Furthermore, under ANILCA the state has the authority to manage it's own lands.

We OPPOSE Proposal #127

The Board of Game has demonstrated leadership in the use of snares for black bears. Allow the BOG process to work as it should.

USFWS uses foot snares for capturing bears. If it is acceptable for the USFWS to use snares to capture bears, it should be acceptable for citizens of the state as well.

We OPPOSE Proposal #128

This is an unnecessary complication to the existing system.

Animals that are caught out of season and turned into Fish and Game are sometimes used for educational purposes.

We SUPPORT Proposal #256 AS AMENDED

We recognize this is a house-keeping proposal and we support the Board's initiative to correct the wording on the former regulation.

We would like to remove the definition of BREAKAWAY and leave the type of breakaway device a trapper chooses to his own discretion. The proposed definition is too rigid. The snare design described in the proposal was developed for moose, not deer. The diverter wire may actually funnel the deer into the snare due to the size difference between a deer and a moose. Some breakaway snares open up as



high as 600lbs and will not work on deer. Furthermore, this design has not been tested on deer and we fear it may have these adverse effects.

We appreciate the opportunity to participate in the regulatory process.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Letarte". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Joe Letarte, president





December 29, 2011

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

Dear Alaska Board of Game:

On behalf of our 8,500+ members, including 200 current members from Alaska, the Wild Sheep Foundation (formerly the Foundation for North American Wild Sheep or FNAWS) wishes to submit these comments relative to Dall's sheep hunting/management proposals before the Board of Game (BOG). We are very concerned about potential implications of several proposals before the BOG that would limit or restrict non-resident Dall's sheep hunting opportunities in Alaska.

Since forming in 1977, WSF has raised and expended more than \$85 million on conservation and education programs in North America, Europe, and Asia. WSF has raised and contributed almost \$1.2 million directly to the state of Alaska, for the benefit of wildlife management, including Dall's sheep conservation and management.

Via their current ability to purchase over-the-counter licenses/tags, and recognizing the guide requirement for non-resident Dall's sheep hunters, we estimate 630 or more non-residents travel to Alaska for guided Dall's sheep hunts, each year. With outfitted/guided Dall's sheep hunts averaging \$12,000-15,000 each, direct economic payments to Alaskan outfitters and guides conservatively range from \$7.5 to \$9.5 million, annually. Add in license/tag fees and other non-resident travel and hunting expenditures relative to Dall's sheep hunting, and direct economic benefits to Alaska from non-resident Dall's sheep hunters could easily double, in the range of \$15 to \$19 million annually.

We strongly believe that non-resident revenue, along with NGO funding such as that provided by WSF and its chapters and affiliates, is a major funding source for Dall's sheep management in Alaska. Restrictions (e.g., limited entry license sales, staggered or shorter-duration hunting seasons) on non-resident Dall's sheep hunting opportunities could severely hinder the ability of Alaska Department of Fish & Game to properly manage Alaska's Dall's sheep resource on a sustained-yield basis, in accordance with Alaskan constitutional requirements. We strongly recommend the Alaska Board of Game does not adopt or implement pending proposals #78-91, and does not restrict opportunities for, and contributions by, non-resident Dall's sheep hunters.

We appreciate your consideration of our recommendations, and we look forward to hearing of the BOG's actions at the January 13-18, 2012 meeting in Anchorage.

Sincerely,

Jack Atcheson, Jr.
WSF Chairman

Gray N. Thornton
WSF President and CEO



December 29, 2011

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

Fax number: (907) 465-6094

RE: Support for Proposal 40-5 AAC 92.037

I support Proposal 40-5AAC 92.037 which would allow non-resident falconers to harvest raptors in Alaska. I support non-resident raptor take for falconry purposes in all states, and have been involved with getting non-resident raptor harvests established in Colorado, Kansas, and Oklahoma. The administration of these non-resident harvests has not proven to be in any way burdensome to the respective state game departments. I am confident that Alaska will not encounter any significant problems managing non-resident take should the proposal be approved.

Alaska falconers regularly travel to the lower 48 states to legally harvest wild raptors, and to hunt with trained raptors they possess. Some individual Alaskan falconers specialize in hunting both greater and lesser prairie chickens on these trips south. Lesser prairie chickens are currently a candidate for endangered listing, and greater prairie chickens are a species of concern. The states where prairie chickens occur allow falconry as a legal means of take, and also allow non-resident falconers to capture wild raptors under permit. The states of Kansas and Oklahoma are notable examples in this regard.

In conjunction with approval of Proposal 40-5AAC 92.037, I would urge the Board of Game to remove the current restrictions on export of wild taken raptors from Alaska by Alaskan residents. These regulations serve no biological purpose, and it would be unfair to leave these restrictions in force.

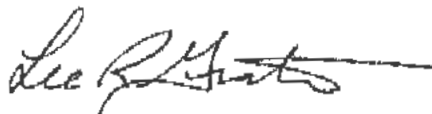
Alaska allows non-resident hunters and fishermen to legally harvest game animals. Non-resident falconers are the only group of sportsmen I know of



who are denied the ability to harvest wild raptors simply because they are non-residents. It is entirely reasonable and biologically justifiable to allow non-resident falconers to take raptors from the wild in Alaska. Increased accessibility to Alaskan raptors will allow the falconry community to diversify the captive raptor gene pool, and provide a safety net for recovery programs, should the need ever arise.

I would like to thank the Alaskan Board of Game for considering this proposal.

Sincerely,



Lee R. Grater
Master Falconer and Central Director American Falconry Conservancy
105 Shadowood Drive
Enid, OK 73703





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
EIM
GAMBELL
GOLOVIN
KING ISLAND
KOVUK
MARY S IGLOO
NOME
SAVOONGA
SHAKTOOLIK
SIISHIMAREF
SOLOMON
STEBBINS
ST. MICHAEL
TELLER
UNALAKLEEF
WALLES
WHITE MOUNTAIN

December 29, 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:

Kawerak is providing comments to the BOG for its scheduled Statewide regulations meeting to be held January 13-18, 2012 regarding Proposal 50, Discretionary permit hunt conditions and procedures; number (5) "a permittee who takes an animal under a permit shall deliver specified biological specimens to a check station or to the nearest department office within a time set by the department; the trophy value of an animal taken under a subsistence permit may be nullified by the department".

To date there have been two public meetings scheduled by the BOG in regards to changing the regulations regarding nullification of trophy value animals. For each meeting there are comments on record from the Northern Norton Sound Advisory Committee, Kotzebue Advisory Committee, Kawerak, Inc. and local ADFG staff to keep nullification of trophy animals as it stands. The alignment of public and department stance on this issue is very significant.

Department staff reports to local hunters and BOG members confirm the success of the hunt. Subsistence hunters have been maximizing take of male musk oxen in Southern Seward Peninsula. All musk oxen regardless of size, in the winter have quality meat, subsistence hunters prefer to acquire as much meat as possible to feed their family and friends.

The local game biologist has demonstrated why it is important to keep trophy nullification as a tool to control a hunt. The department reviews every hunt and does a seasonal survey which enables them to make adjustments that allows for growth of the herd while providing opportunity to hunters. In contrast the BOG is not in a position to analyze data and is not in a position to act quickly as the population dynamics change annually.

On the Seward Peninsula there are two different hunts for musk oxen which are managed by the Nome Game Biologist. The Northwest area of the Seward Peninsula has a sport hunt which means there is no trophy nullification and the hunters keep the horns, the **large population of**

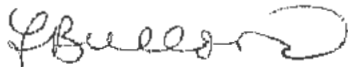


in that part of the peninsula allows for this opportunity. In the Southwestern and Southeastern area of the Seward Peninsula, there is a subsistence hunt with trophy nullification which is required because the area has the highest number of hunters and limited number of Musk Oxen. The department has reported to the BOG that there cannot be a separate hunt for subsistence and sports hunting in Southwestern and Southeastern Seward Peninsula because the amount of **musk oxen available is less in the easily accessible areas, around Nome.**

It is our recommendation to keep the current language for trophy nullification as written in regulation.

Sincerely,

KAWERAK, INCORPORATED



Loretta Bullard
President





P.O. Box 55390
North Pole, AK 99705-0390

29 December 2011

Cliff Judkins, Chairman, and all Members
Alaska Board of Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
Fax: (907) 465-6094

Dear Chairman Judkins and Members of the Alaska Board of Game,

The Alaska Falconers Association (AFA) is pleased to present the following written testimony for consideration in your upcoming deliberations of statewide "Cycle B" proposals. For over thirty years, the AFA has served as the voice of Alaska falconry. We represent not only the interests of falconers, but the welfare of Alaska's wild raptor populations. We are proud to claim nearly all of Alaska's licensed falconers as AFA members.

We respectfully request that you:

1. **Adopt Proposal No. 38 in its entirety;**
2. **Reject Proposal No. 39;**
3. **Make any additions or amendments using Proposal No. 38 as a starting point;**
and
4. **Reject Proposal No. 40.**

Details on each of these points follow.

1. Please adopt Proposal No. 38 in its entirety.

Briefly, the AFA proposal

- a) met the Board's April 2011 deadline;
- b) is complete and was created with the Department's input; and
- c) has been reviewed and approved by the Service.

Falconry is unique in many regards, not the least of which is the ability of its practitioners to capture wildlife and keep it alive, a real anomaly under the North American Model of



Wildlife Management. It is so special, the United Nations Educational, Scientific, and Cultural Organization – UNESCO – last year inscribed the 4000-year-old sport of falconry on the list of “The Intangible Cultural Heritage of Humanity.” Slogging through the mudflats trying to flush ducks for a falcon or bashing through dense brush flushing snowshoe hares for a goshawk, it’s hard to imagine we’re engaging in a worldwide intangible treasure, but who’s to argue with UNESCO?

All parties involved agree falconry is not only unique, but it exerts no measurable impact on either wild raptors or their quarry. Let us emphasize that last point – falconry is biologically insignificant.

Many more raptors are killed each year – by illegal shooting, accidental trapping, vehicle collisions, window strikes, and power line accidents, to name a few – than are taken by falconers in Alaska in ten years. Yet, falconry is the activity restricted by extensive and complex regulations.

Since the 1970s, falconry has been jointly managed by the U.S. Fish and Wildlife Service (Service) and the respective state wildlife agencies in each of the 49 states where falconry is legal (Hawaii has no non-endangered local raptors and prohibits import of most animals, including raptors). Falconry permits are issued jointly by federal and state authorities, and falconers report their activities to both, primarily through Federal Form 3-186A, a document which must be filed within days of acquiring, disposing of, transferring, or otherwise changing the status of every individual raptor.

In Alaska, falconry is authorized by relatively brief language set in regulation. That language adopts by reference a detailed document called the *Alaska Falconry Manual (Manual)*, which has been updated several times over the years. *Manual No. 8* is presently in force. It is 24 pages long. In any given year, there are twenty-five or thirty actively practicing falconers in Alaska. We know of no other field sport where participants are managed with nearly a page of regulatory standards for every single one of them.

In 2008, the Service announced it was getting out of the business of directly managing the nation’s falconry program. They passed falconry’s administrative burdens to the individual states but retained their authority to oversee each state’s falconry program and the ability to enforce the federal rules. The Service substantially changed the overarching regulatory structure governing the sport. Among other things, they eliminated the existing jointly issued federal-state permits in favor of state-only permits.

Notably, the Service required each falconry state to bring its regulations into line with federal standards by January of 2014. If a state failed to do so, falconry would no longer be allowed as a legal method of hunting in that state. There will be no exceptions, no excuses, no grace periods, and no extensions. Consequently, if we fail to act at your upcoming meeting, falconry will become illegal in Alaska.



Frankly, we're dismayed at the heavy-handed consequences of missing this deadline and cannot imagine any other hunting or fishing group facing such an ultimatum. However, we see no alternative but to accede to the Service's directive.

So, beginning two and a half years ago, we rewrote Alaska's falconry rules to comply with the new federal rules. As you will recall, we have repeatedly contacted both the Board and the Alaska Department of Fish and Game (Department) to apprise you of our progress and to solicit any suggestions, advice, or other input you might have. We didn't expect you would be able to immerse yourselves in the minutiae of extensive regulations governing an activity practiced by a handful of Alaskans, but wanted you all to know what we were up to and to let you know your participation was welcome.

Rewriting *Manual No. 8* proved to be a huge job, far more technical and detailed than we initially envisioned. The AFA solicited input from its members and communicated frequently with the Department and the Service as we drafted and redrafted the *Manual*. We ultimately settled on what we felt was a complete and reasonable package in draft number nine. The Service has reviewed that draft; Dr. George T. Allen, Chief of the Permits and Regulations Section of the Service's Division of Migratory Bird Management, informed us it met their minimum requirements.

We'd like to thank the Department for wading into the details of these regulations with us, particularly Chief Wildlife Scientist Dr. Kim Titus and Permits Section head Tom Schumacher. Falconry is an unusual sport pursued by a very few Alaskans, and we appreciate the Department giving so much of their valuable time and energy to this project.

Our proposed new *Manual No. 9* is 42 pages long – nearly two pages for each practicing falconer in Alaska. Just to be clear, we don't see this as positive progress. We liked our old rules. But the federal changes necessitated the expansion contained in *Manual No. 9*. As we mentioned earlier, we know of no other field sport in Alaska that is so regulation-intensive. This strikes us as especially ironic for a practice that exerts no measurable biological impact on either raptors or quarry.

Forty-two pages is serious overkill, but we don't mean to complain. We just want to fly our birds. It's an honor and a joy to work every day with creatures that inject themselves at their dinners at hundreds of miles per hour. It's endlessly fascinating to see how their supremely adapted quarry uses agility, strength, and guile to evade them. It's so much fun and so central to our lives, we're willing to jump through whatever bureaucratic hoops are necessary to do it. This sport doesn't involve many Alaskans, but for those of us bitten by the falconry bug, flying birds is as essential as breathing.

Again, please adopt Proposal No. 38 at your January 2012 meeting.



2. Please reject Proposal No. 39.

The Department's proposal No. 39, largely due to its version of *Manual No. 9* is inadequate. We urge the Board to reject it.

The Department's version of *Manual No. 9*

- a) was introduced more than seven months past the Board's deadline;
- b) is incomplete and contains many errors and omissions; and
- c) has not been reviewed and approved by the Service.

We knew the AFA and the Department did not see eye to eye on every detail of the new falconry regulations, so we were not surprised when their Proposal No. 39 differed slightly from our Proposal No. 38. We were confident we could work with the Board and the Department to successfully resolve these minor disagreements. Those differences are outlined and addressed below.

If we had presented our proposal in December, we are confident it would not have been allowed into consideration. We encourage the Board to apply the same standard to all players and reject the Department's version of the *Manual* presented as an adjunct to their Proposal No. 39.

We were surprised, disappointed, and concerned when the Department issued its own version of *Manual No. 9* in December of 2011. Our review found at least four formatting errors, 11 internal discrepancies, 21 items needing correction, 44 omissions, at least 55 significant questions raised by the Department's proposed changes, and 61 typographical/grammatical errors. We feel that the volume of work required to repair these problems exceeds the time available before the Board meets. We recommend the Board reject Proposal No. 39 and use the AFA's Proposal No. 38 as a starting point, and address the minor changes outlined below at the January meeting.

Beyond the extensive work required to repair the Department's proposal, we are especially concerned that the Service has not reviewed and approved it. If the Board were to adopt Proposal No. 39 and the Service later found it inadequate, falconry in Alaska would be in serious peril. We feel we cannot afford to risk losing the entire sport by adopting Proposal No. 39.

3. If necessary, make additions or amendments using Proposal No. 38 as a starting point.

We knew last April we didn't see eye to eye with the Department on three fairly minor details. We believed we could start from a basis of substantial agreement on our proposal and then present our respective cases to the Board on those three issues. We believe our proposal is reasonable and urge the Board to adopt it. If the Board chooses to consider



the three subjects mentioned above, we recommend using our Proposal No. 38 as a starting point and amend it as needed.

The members of the Alaska Falconers Association are in substantial agreement with the Department on the new federal regulations. The exceptions include:

- a) the list of species available for use by falconers;
- b) annual reporting; and
- c) sterilization of non-indigenous goshawk subspecies.

a) The list of species available for use by falconers.

Our overall philosophy is that if the federal government allows it, and there's no biological reason against a small take of birds from the wild, we ought to allow the species the feds allow. The species list in our proposal takes the federal list, which includes virtually every bird of prey species in North America, from California condors and hook-billed kites to crested caracaras and elf owls, and narrows it to those species that occur naturally in Alaska, as catalogued by the University of Alaska Museum.

To our knowledge, some of the species we propose have never been flown in falconry. Some will say a falconer can't hunt with an osprey or a boreal owl, but we beg to differ. Four thousand years ago, there surely were people who looked at raptor enthusiasts with skepticism and said "you can't get that bird to catch food for you; it's never been done before." Obviously, that has been proven wrong many, many times.

The Department expressed concern that allowing certain small owls to be held under falconry permits would lead to pet-keeping. We maintain that the fundamental rules of falconry prevent pet-keeping. The regulations we propose explicitly state birds held under falconry permits must be flown and hunted. For reasons we don't understand, the Department removed that stipulation from their version of the *Manual*.

We find it maddeningly ironic that the Department's list does not include short-eared owls, yet agents of the U.S. Department of Agriculture Animal and Plant Health Inspection Service's Wildlife Services program shot fifteen short-eared owls off the runway at the Juneau International Airport a couple of years ago, under the terms of a permit jointly issued by the Department and the Service. Falconers may not have bald eagles – and we recognize this prohibition is beyond the scope of the present regulation-setting exercise, but the logic of the situation is pertinent – yet a permit was recently issued allowing the take of up to two years' productivity of up to 11 bald eagle nests that might be affected by a road-straightening project near Juneau. These are just two examples of activity that goes on all over the state. We don't wish to meddle in the safety of airline passengers or obstruct the development of our state's transportation infrastructure. However, it does seem reasonable to allow falconry use of all federally



available raptor species, especially those that are occasionally legally and lethally removed from the wild for other purposes.

The Department also voiced concern that certain small owls might take protected quarry. Anything is possible, but small owls are extremely unlikely to be flown in falconry by more than one or two people, and those one or two owls are unlikely to take protected songbirds or other difficult quarry. If they were to do so, the federally and state-approved clause already provides for such take (i.e., the "let it lie" law).

However, in the interest of songbird conservation, our members would be delighted to see the Department's concern expanded to a widespread existing threat to songbirds. Every year, domestic cats kill many thousands of protected songbirds in Alaska. We would happily join the Department in a concerted effort to reduce that take of songbirds. Barring that, we encourage the Department to take a lenient view on falconry with owls.

We don't anticipate a rush for any of these additional species as falconry birds. As long as there's no biological concern for either raptors or quarry, and if someone wants to give a new species a try, we feel there's no harm in adopting the federal list of species that occur in Alaska.

Our proposed list includes, with the Department's approval, five raptor species not indigenous to Alaska: Cooper's hawk, Harris's hawk, ferruginous hawk, prairie falcon, and aplomado falcon. These species are popular among falconers in the Lower 48 states, and would provide additional hunting opportunities to Alaska falconers. For example, the Harris's hawk is well-known as a species with a particularly agreeable temperament and a willingness to pursue a wide variety of quarry. This bird, along with the other four temperate zone raptors proposed, is extremely unlikely to survive in the Alaska wild if lost, which is already a slim prospect, as discussed earlier.

And just for clarity's sake, we recommend adding the phrase "including all subspecies thereof" to the list of species allowed for falconry. With the availability of birds trapped as migrants in other states and the expanding role of captive propagation as a source of falconry birds, Alaska falconers have access to subspecies or mixes of subspecies that may not occur, or occur rarely, in the state. We share the Department's conclusion that the occasional raptor of a non-Alaska subspecies or mix of subspecies flown in falconry constitutes no threat to Alaska's wildlife. Our practice of falconry depends on healthy wild raptor populations. We wouldn't have recommended this if we had believed otherwise.

b) Annual reporting.

Every time a falconer acquires, transfers, or releases a bird, when a bird is lost or stolen, or when a bird dies, or in any other instance of a change in status of a raptor held for falconry, the falconer must file Federal Form 3-186A with the state and the Service.



These reports are required within a matter of days of any change in status. In addition to these reports, the Department requires falconers to summarize their activities in an annual report as well. We believe this is unnecessary; our Proposal No. 38 eliminates this annual report.

Under the Service's new rules, the 3-186A is still required in all of the circumstances mentioned above, but that form would be filed only with the state. Electronic filing and a new federal data base should make that process easier and the information more accessible to state managers. Since the Department will continue to receive prompt notification on falconry activity, we believe with proper cataloging and manipulation of these data, the Department could effectively monitor falconry activity without requiring each falconer to complete an additional report each year.

As far as we are aware, the Department has never used and does not anticipate using these data to do anything, such as directing raptor take or setting falconry hunting seasons. Hard copy annual reports from every licensed falconer means Department personnel must manually enter these data. That's more work for the Department and more opportunity for data entry error. There is no reason to require this additional reporting.

That said, we have an abiding interest in following falconry activity from year to year. We would be happy to work with the Department to design and test an electronic monitoring system using the required 3-186As to track trends in Alaska falconry.

c) Sterilization of non-indigenous goshawk subspecies.

The Department is concerned about falconry use of European subspecies of goshawk, fearing an escaped bird could survive and breed in the wild, to unknown effect. This is possible, but with required use of radio transmitters, the chance of permanent loss to the wild is low. Moreover, the monetary outlay required to secure such a bird from a raptor breeder provides a strong incentive to bring a bird home at the end of each day.

The Service sees no threat in allowing European goshawks to be flown by falconers anywhere in the country.

We contacted wildlife management agencies in each of the 27 Lower 48 states with breeding populations of goshawks. Of the 12 states that responded, all allow falconers to fly European and other non-indigenous goshawk subspecies. Of those, seven impose special restrictions ranging from permits to import non-indigenous goshawks to requiring attachment of two radio transmitters to hunting birds to reduce the possibility of loss to the wild. None require surgical sterilization as the Department advocates in Alaska. Of the states that said they specifically discussed and addressed the issue of escapees breeding in the wild, none deemed the possibility significant enough to warrant strict protective measures, certainly nothing even remotely close to surgical sterilization of falconers' birds.



We'd like the Board to consider behavioral sterilization as a viable method to contain the remote possibility of non-indigenous goshawks breeding in the wild.

Early in life, birds readily imprint on large, moving objects, and that association stays with them throughout their lives. We've all seen images of Dr. Konrad Lorenz swimming along with a string of imprinted goslings in tow. Observers may disagree as to whether the goslings saw Dr. Lorenz as another goose or perceived themselves as humans, but the effect is the same: when fully grown and sexually mature, they did not recognize other geese as potential breeding partners. The same principle works with raptors. Goshawks imprinted on humans will not recognize other birds as potential mates and will not breed with them.

We believe the Department's advocacy of surgical sterilization of non-indigenous goshawk subspecies is unnecessary. Surgical sterilization is expensive, not widely available, and inherently dangerous. We urge the Board to recognize the minute nature of this possible threat and allow all goshawk subspecies in falconry or, at minimum, include behavioral sterilization as an acceptable level of safeguard. Our practice of falconry depends on healthy wild raptor populations. We wouldn't have recommended this if we had believed otherwise.

At the beginning of our document, we've summarized – if a six-page list can be considered a summary – the changes we propose to *Manual No. 8* in creating *Manual No. 9*. There are 85 specific changes. We're sorry it's so lengthy, but we've done our best to translate the required federal changes into language and format used for decades by the Department and Alaska falconers. If you have questions about any of those changes, we'd be happy to try to answer them for you.

4. Please reject Proposal No. 40.

Finally, we feel compelled to comment on Proposal No. 40, an Outside group's attempt to create a new system of non-resident take of raptors for falconry. The proposal is vague and deeply flawed; we suspect the Board is unlikely to approve it. However, we did not want our silence to be misinterpreted as support or acceptance of the proposal. We hesitate to even comment, except to urge the Board to reject Proposal No. 40.

Thank you for your time and attention and for your service to Alaskans. We realize falconry is an obscure practice and not generally well-understood by otherwise experienced hunters and outdoor enthusiasts. But for a handful of dedicated Alaskans, it is the central activity of their lives. Thank you for making it possible for us to enjoy hunting with our raptors.



Chairman Cliff Judkins and the Members of the Alaska Board of Game

29 December 2011

Page 9 of 9

We'd be pleased to answer your questions about our proposal, provide further information on falconry in general, or arrange for interested Members to accompany falconers to the field with their birds. We hasten to renew our standing invitation to anyone from the Board, the Department, other agencies, or support staff to experience falconry firsthand. If we could arrange outings for you, we'd be happy to welcome you to the field. Thank you.

Sincerely,



William R. Tilton, President
Alaska Falconers Association



Dear Alaska Board of Game

My name is Gary Hampton, I am a legal Alaskan falconer with a Goshawk in present possession.

Raised in Georgia, as a little boy, I remember reading a Nat'l Geographic about falconry. Then I saw my first Coopers hawk and I was bit at the tender age of about ten years old.

We moved to Texas and there as a young man in the early 60's pursued my passion for falconry but when at the point I nearly trapped a Redtailed Hawk my dad said emphatically NO , which of course broke my heart. He thought a hawk would put out my eyes, but I still have my eyes, smiles.

Marriage, and going into the ministry put falconry on the back burner until in 1979 we came to Alaska.

It was here that falconry came deeply into my life. It was here I took my first hawk and Harlans Redtailed Hawk. The joys I have experienced have abounded.

Now we are faced with serious consequences if we don't act to save our precious falconry enjoyed by few but that few is very serious and passionate.

I am asking you to please accept Proposal # 38 written by the Alaska Falconry Association

I am asking you to reject Proposal #39

I am asking you to reject Proposal #40

I am against the surgically impairing of Subspecies of the Northern Goshawks as there is no reason whatsoever for this severe and dangerous plus costly procedure.

Thank you so much for reading my request and hope you a fine New Year !

Gary Hampton, Fairbanks Alaska



FAX 907-465-6094

December 29, 2011

WOLF PROPOSALS-GAME MANAGEMENT UNITS 15A & UNIT 15C

I am opposed to aerial hunting of wolves in Game Management Units 15A & 15C. I don't believe that Alaska Department of Fish and Game has *scientifically* shown that wolves are one of the major factors in limiting the moose population on the Kenai Peninsula.

I understand that 191 moose have been killed by vehicles on the Kenai Peninsula in the most recent 6 month period. I believe vehicle collisions are a major factor in limiting the moose population on the Kenai Peninsula.

Another limiting factor on the Kenai Peninsula is probably lack of adequate habitat. The human population on the Kenai Peninsula has increased rapidly in the last 10 years. Habitat is being destroyed and more and more vehicles are on the Kenai Peninsula roads.

If the Board of Game wants to increase the moose population on the Kenai Peninsula, they should direct Alaska Fish & Game, Alaska Department of Transportation, or some other State/Federal agency to initiate a plan to reduce vehicle collisions with moose. This can be accomplished without aerial gunning of wolves and would be much more effective in increasing the moose population. It might take longer and cost more, but the results would be long lasting. Fencing along major roads in heavily populated areas could cut down on vehicle collisions. Construction of over/under passes for moose could also decrease vehicle collisions in areas frequented by moose.

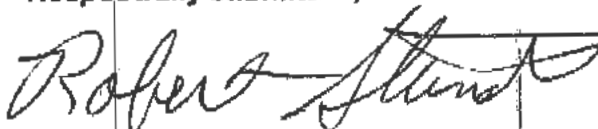
Wildlife Management 101 teaches students the predator/prey relationship in a scientific manner. The Board of Game needs to follow science, NOT politics!!

Historically, man's interference with the natural predator/prey relationship often backfires.

The proposals to eliminate wolves by aerial gunning is ill conceived and unscientific.

I also think it is disrespectful by the Alaska Board of Game to not give more advance notice for the public to comment on these proposals.

Respectfully submitted,



Robert Standish
PO Box 1106
Kenai, AK 99611



FROM JACK ATCHESON JR
JACK ATCHESON + SONS
3210 OTTAWA ST.
BUTTE, MT 59701
EMAIL JACK-JR@ATCHESON.COM
PH 406 782 2332

TO ALASKA BOARD OF GAME
PO Box 115526
JUNEAU, AK 99811-5526
FAX 907 465-6094

DEAR ALASKA BOG,

I RUN A HUNTING CONSULTING FIRM, JACK ATCHESON + SON
BASED IN BUTTE, MT. IT WAS FOUNDED IN 1955, BY MY
FATHER JACK ATCHESON SR. I JOINED THE BUSINESS IN 1971.
A YEAR AFTER I MADE MY FIRST DALL SHEEP HUNT ON
THE KUNENE RIVER IN THE ALASKA RANGE. OUR COMPANY
ADVISES HUNTERS WHERE TO GO FOR A QUALITY
HUNTING TRIP. OUR COMPANY HAS SENT THOUSANDS OF
NON RESIDENT, NON RESIDENT ALIENS AND ALASKA RESIDENTS
TO EVERY CORNER OF ALASKA. WE KNOW ALASKA
IS VERY SPECIAL. WHAT MAKES IT SPECIAL IS



The access to hunt where fish and game is well managed, access to quality outfitters and flying services. Over the counter licenses are the foundation access options. We understand a number of proposals have been submitted for your consideration this year that have the access to Dall sheep hunting opportunities for non resident and non resident Dall sheep hunters in serious jeopardy. I strongly recommend the Alaska BOG does not vote for proposals # 78-91. Access to hunting and fishing should be restricted by the rise or fall of wild life populations, not special requests of a segment of hunters or fishermen.

I greatly appreciate your consideration to my request to keep access to Dall sheep hunting as they have been. Please react to the science of wild life management, not the petty politics

Regards
Jack Atcham Jr.



FAX COVER SHEET

To: **From:** "Bev Wunderlich"
<jbsafari@comcast.net>

Company: **Date:** 12/29/11 01:30:02 PM

Fax Number: 9074656094 **Pages (Including cover):** 3

Re: Alaska Board of Game

Notes:

J/B ADVENTURES & SAFARIS
(303) 794 4485

**American Association of International
Professional Hunting and Fishing Consultants**

December 28, 2011

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

Dear Alaska Board of Game

Our group is composed of the top hunting consultants in NA. Many of our businesses have been advising hunters on when to hunt in Alaska for 20 to over 50 years. We understand that a number of proposals have been submitted to your board that attack parity in opportunity for nonresident and nonresident aliens to hunt Dall Sheep in Alaska. A resident season opener starting ten days early or a 10% quota on nonresidents for drawing areas or total drawing only for nonresidents for Dall sheep have no science based benefits to wild sheep conservation in Alaska. Alaska will just appear to be "bad neighbors" and that is plainly bad business for a shareholder funded wildlife management system. Please manage wildlife with science based facts and parity to the hunters that fund management.

President of AAIPHFC
Beverley Wunderlich



RECEIVED

Thursday December 29, 2011.

DEC 29 2011

BOARDS
ANCHORAGE

To: the Department of Fish and Game Board.

I strongly oppose proposals 43, 35 and 36, Unit 15C and proposal 127 that would allow the killing of wolves which would constitute a blatant attempt at game farming.

Since the past and present administration appointed their friends to the Fish and Game Board people such as Corey Rossi, appointed as the director of wildlife, hundred of bears have been killed over the past three years after being caught in snares. This included black bears, sows and cubs in this ADF&G savage, cruel, and barbaric profitable "experimental business".

Ann Scott
Public Comment
306-5W
2012

The state is never going to have enough moose and caribou for the inside and outside sportsmen and fur trappers. People from all over the world come to Alaska to kill moose and caribou for trophies.

They are using wolves and bears as scapegoats by killing them indiscriminately to increase moose and caribou population for their business. They are managing the wildlife as if it were their property. The Advisory meetings and Fish and Game Board are not made public to the people. The wildlife belongs to all Alaskans not just to these public servers.

The Kenai Peninsula is a world-renowned, year round recreation area for Alaskans and visitors alike, and supports several population centers. Cruel, inhumane and barbaric aerial wolf hunting and fur trapping would be contrary to the lifestyle and economy of this area.

Proposal 43 concerning the current beaver regulations are outdated and fail to recognize the important role that the beaver's habitat plays in healthy ecosystem for fish, birds and other wildlife.

The reason we are in the situation that is happening around the state is because of the commercial hunting and fur trapping industry that has a hold on our public process. We should stay focused on the commercial hunting and fur trapping industry and not on wolves and bear killing. Until the state governor kills the commercial and fur trapping industry, these barbaric and savage predator control issues will finally go away.

I recognize that there are good biologists but there are also killers who twist science for their own gain. Recently more wolves and bears have been killed like never before.

For example, Aaron Bloomquist who was the chair of the Anchorage Advisory and is also a guide, told me that if my comments do not meet their expectations they will end up in the trash. Corey Rossi told me once on the phone that he won't let people like me take



away the sport hunters rights. Sherry Wright also told me on the phone that it doesn't matter what the public says because at the end, they are the ones who decide. It looks like the public's comments do not count when it concerns Alaska's wildlife. They want to take control of the wildlife for themselves in one way or another by force.

Last month, Groover Norquist explained on 60 minutes how lobbyists control, bribe and manipulate politicians, and these who are in charge of special issues to get their way. Norquist also said that whoever is against their ideas is get rid of.

In the past, I have been targeted by some of the state employees, by a radio talk show, and by sportsmen for speaking on behalf of the wildlife. I thought that there was democracy in the U.S.A.

What is happening to Alaska's wildlife is like science fiction. There is war on wildlife such as the state blowing away wolves and bears with helicopters, trapping, snaring and using carbon monoxide to eradicate wolves and bears to increase moose and caribou for their profitable business.

Do not use wolves and bears as scapegoats because of humans faults and for over hunting. Animals kill other animals for food and survival because it is their nature. God made them that way to eat each other.

If the animals were killed for "subsistence", it wouldn't be necessary to apply this horrific method of predator control. They should focus on controlling the commercial hunting (trophy) hunting and fur trapping industry; not on wolves and bears killing.

The natural resources belong to all American people not only to these public servers. I do not understand how true Alaskans allow this unscrupulous sport hunting business to operate freely in Alaska. We won't have balance until we have non-hunters on the Board of Game not just hunters and fur trappers who know how to get paid for their votes.

(Hosea 6:6)

Yolanda de la Cruz
806 W. 57th Avenue
Anchorage, Ak. 99518



**Non Resident Hunter and Pittman Robertson Funds
December 29, 2011**

The current discourse about resident and non resident hunters and who should have priority needs to be looked at objectively. In a majority of cases, the nonresident hunter is associated with the Alaska guiding industry, so I will address that aspect.

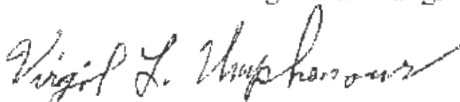
The guiding industry, like the commercial fishing industry, is an important economic entity for the State. Professional guide personnel, transporters, sporting goods stores, aviation entities, game processors, food banks, taxidermists, wildlife managers, etc. all prosper from the nonresident hunting and guiding industry. To summarily argue that Alaska residents should have priority in harvesting game is short sighted. An Alaska resident pays \$25 for a hunting license and can harvest moose, caribou, sheep, goat, black bear, and grizzly bear. All for a mere 25 dollar license! The Alaska resident pays no tag fees to hunt the State's big game animals (the exceptions are musk ox and brown bear). Alaska is the only state west of the Mississippi that has this policy.

So who foots the bill for wildlife management? The majority of the State budget to manage hunting in Alaska comes from the sale of hunting license and tags. Now remember that residents do not pay tag fees. In the 1930's the US Congress passed the Pittman Robertson Act. This bill placed a tax on all ammunition, guns, archery equipment, etc. The money from this tax *matches three dollars* for every *one dollar* that the State collects for licenses and tags. For example: A non-resident sheep hunter pays \$85 for a license and \$425 for a sheep tag. This totals \$510. The "Pittmann Robertson" money from the federal government match is $3 \times \$510 = \1530 . Hence $\$1530 + \$510 = \$2040$ goes into the State's coffers for wildlife management program. This is one 'heck' of a deal and funds a substantial percentage of our wildlife management program. If this same 'out of state' hunter buys a moose tag (\$425), wolverine tag (\$175), caribou tag (\$325), wolf tag (\$30) the match grows larger.

Moose $3 \times \$425 = \$1275 + \$425 = \1700
 wolverine $3 \times \$175 = \$525 + \$175 = \700
 caribou $3 \times \$325 = \$975 + \$325 = \1300
 wolf $3 \times \$30 = \$90 + \$30 = \120
TOTAL \$3820 + \$2040 from the original sheep tag and license = \$5860

Now what could happen if we did not have sufficient money to effectively manage our wildlife programs and do the scientific research on our wildlife populations (both predator and prey)? Managers would be forced to manage conservatively. The bottom line could well be shorter seasons and fewer permits for both resident and nonresidents

We are all aware of the value of the commercial fishing industry to Alaska. It is time that we give the commercial guiding industry and the nonresident hunter the appreciation that they deserve in contributing to both our growing economy and wildlife management.



Virgil L. Umphenour
 878 Lynnwood Way
 North Pole, AK 99701
 488-3885



Dall sheep N. Res

Year	Income	# Hunt Tks	# Hunted	# sheep Hunt	% Hunt	% hunted
2006	\$1,468,800	720	558	340	47.2%	60.9%
2007	\$1,575,920	773	600	403	52%	67.4%
2008	\$1,615,800	645	483	302	46.8%	62.5%
2009	\$1,301,520	638	510	336	52.6%	65.8%
2010	\$1,283,160	629	454	294	46.7%	64.7%
Tot	6,946,200	3135	2605	1675		
Aug	1,389,240	627	521	335	53.4%	64.2%

I oppose all the proposals to restrict nonresident Dall sheep hunting. When I was on the Board of Fish I attended the WAFWA meeting. During that time no Board of Game members did, as I was a big game guide I also would give a report for the Board of game at the meetings. At the meeting in Park City, Ut in July of 2001 we received a report from Ut & Co. We also toured the Desert (sp) Ranch for an entire day to learn about Utah's program on private property. This ranch 200,000 acs cut their cattle & sheep production by 50%, implemented habitat improvements for wildlife & started a guiding operation. The state of Utah gives them all trophy permits for deer & elk. In return they allow residents to hunt for antelope or small bucks & bulls in a registration hunt on their land. The state of Colorado does a similar thing if the land owner has 10,000 acs. The Commissioner (board member) from Colorado that gave the presentation for his Commission said his father would roll over in his grave if he knew that he was doing habitat improvement for elk & deer & raising less antelope & in the hunting guide business.

Virgil L. [Signature]



209 Non R. Applications
x 90

$18,810 \times 3 = 56,430 = 75,240$

14 Unguided
x 400 M. Tag

$5,600 \times 3 = 16,800 = 22,400$ Moose Tags

14 Guided

400 M. Tag

225 BL Tag

500 G. Tag

60 2 WF Tags

80 14 day S. Fish

$1265 \times 3 = 3,795 = 5060$ per hunter Tags & S.F. Lic

$$\begin{array}{r} \times \quad 14 \\ \hline 70,840 \end{array}$$

- 75,240 Lic & application
- 22,400 Non Guided Moose Tags
- 70,840 Guided Tags & 14 day S.F. Lic

\$ 168,480 From 28 Non Res to FG Game Fund

by Vigil

2010 Koyukuk
Cont Use Area
14 Guided N.R.
14 Non Guided N.R.



**ALASKA HORSEMEN
TRAIL ADVENTURES**

PO Box 857
Cooper Landing, Alaska
99572



907-595-1806
1-800-595-1806

www.alaskahorsemen.com
info@alaskahorsemen.com

Alaska Board of Game,
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
fax to 907-465-6094.

December 27th 2011

RE: Predator Control, Units 15 and 7

Dear Sirs,

I am writing in favor of predator control in whatever matter Fish and Game sees fit on the Kenai Peninsula.

I am a licensed transporter with horses as well as guide with horses for tourists in the Kenai Mountains from Cooper Landing to Hope. I also work the Tustumena bench country where I transport hunters for the moose trophy area. I have worked these areas for over 20 years on a yearly basis.

I have personally seen the growth of wolves, black bear and brown bear in these areas as well as the steep decline in moose.

I feel it is desperate that we control the balance of predators in these areas so that our moose can once again be abundant in these areas for the harvest of generations to come.

Please get control of the predators in these areas before it is too late. Please call or write if you have any questions.

Sincerely,

Alex Kime

Alaska Horsemen Ranch
www.alaskahorsemen.com
info@alaskahorsemen.com
907-595-1806



Alaska Board of Game,
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
fax to 907-465-6094.

December 27th 2011

RE: Predator Control, Units 15 and 7

Dear AK Board of Game,

I am writing in reference to the proposed intensive management plan for wolves on the Kenai Peninsula.

I have grown up hunting every season on the Kenai Peninsula. I ask that we work as hard as we can to keep the wolf population down. The things I have seen with my own eyes regarding the abundance of wolves and killed baby moose only reinforces the lack of moose our family is starting to see in the mountains within the last few years. The cows are in hiding, the wolves run rampant and something must be done about this.

Please get control of the predators in these areas before it is too late.

Sincerely,

Gretchen Kime

alaskamountaingirl@yahoo.com





441 West Fifth Avenue, Suite 300
Anchorage, AK 99501
Tel: 907-276-7034
Fax: 907-276-5069
www.audubonalaska.org

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

Audubon Alaska is a state conservation organization, based in Anchorage. Our mission, similar to the Department's, is to conserve the natural ecosystems of Alaska, focusing on birds, other wildlife, and their habitats, for the benefit of current and future generations. Our members include sport hunters and subsistence hunters as well as non-consumptive users.

We understand that many of the board's actions are driven by Alaska's intensive management law, which prescribes predator control (intensive management) when ungulate harvest objectives are not met. Such inflexibility is unfortunate. We ask that the board critically question the assumptions and information it is given, especially when it is anecdotal in nature. Please request hard survey information, and an assessment of the source and confidence limits on that information, before implementing intensive management.

We ask that the board pay greater attention to the role habitat plays in supporting healthy populations of both predators and prey, and ask for more information from the Department on browse utilization levels, habitat condition, and ungulate carrying capacity when considering regulatory changes. Ungulate harvest objectives should be periodically reviewed in the face of this information, and not fixed at what might be historically high or unsustainable levels. When the Board makes regulatory changes that reduce harvest (e.g., redefining a legal bull), that should not trigger intensive management.

Finally, some of these proposed regulatory changes cross the line of what most people, including hunters and trappers, consider ethical. Maintaining standards of fair chase and humane methods of killing are important if the state wishes continued public support.

We ask you to exercise your responsibility to strike a fair balance among all users of Alaska's wildlife resources, base your decisions on good science, practice adaptive management, and maintain high standards of ethics and fair chase in all hunting and trapping activities. Alaska has been and should resume being an example to the rest of the world of progressive, science-based wildlife management.



Audubon Alaska report

2

We provide recommendations on 42 proposals, dealing primarily with bird-related issues (falconry and ptarmigan proposals), bear baiting and snaring (both black and grizzly), intensive management, methods and means (use of aircraft, helicopters, lights etc.), and trapping and baiting regulations in National Parks.

Thank you for considering these comments

Matthew Kirchhoff
Director of Bird Conservation
Audubon Alaska
Anchorage, AK 99501



Audubon Alaska report

3

PROPOSAL 15 - 5 AAC 85.056. Hunting seasons and bag limits for wolf. Increase the bag limit for wolves in Unit 18.

Position: *We oppose* this proposal.

Reason: The Board has just entertained proposals to approve cow hunts, extend seasons and bag limits, and consider liberalizing methods and means of moose harvest in unit 18 out of concern the population is increasing too rapidly and will outstrip the carrying capacity of its range. It is illogical, then, to liberalize the bag limit for wolves. Here is an excellent opportunity to demonstrate to the public the Department's commitment to managing predator-prey systems sustainably, and not fall victim to anti-hunting group's claims that the Board simply wishes to eliminate predators.

PROPOSAL 20 - 5 AAC 85.065. Hunting seasons and bag limits for small game. Increase the bag limit and lengthen the season for ptarmigan in Unit 18.

Unit 18: Fifty per day, one hundred in possession. August 10 - June 15.

Position: *We oppose* this proposal.

Reason: The current regulation matches that in surrounding GMUs. We would be surprised if many people shoot 20 ptarmigan per day, and might have shot 50 if only the regulation were different. Liberalizing the bag limit without biological justification invites similar proposals from any GMU where ptarmigan occur, and sends the message the board does not particularly care about the number of ptarmigan taken.

PROPOSAL 24 - 5 AAC 85.020. Hunting seasons and bag limits for brown bear. Align brown bear seasons in Unit 22C with remainder of Unit.

Unit 22C:

Residents: August 1 - May 31, one bear every regulatory year.

Nonresidents: August 1- May 31, one bear every regulatory year by drawing permit.

Position: *We oppose* this proposal.

Reason: Unit 22c includes Nome, and bears throughout the unit are exposed to relatively easy hunting via the road system. The existing season, and the existing boundaries, are in place for conservation reasons, and should be maintained. The seasons are currently liberal. Liberalizing them further would unduly reduce opportunities for bear guiding (whether hunting or viewing) off the road system in 22C.

PROPOSAL 26- 5 AAC 85.020 Hunting seasons and bag limits for brown bear. Open a year round season for brown bear in Unit 22.

No closed season for brown and grizzly bears in Unit 22.



Audubon Alaska report

4

Position: *We oppose* this proposal.

Reason: There is no biological justification for this drastic proposal to even be entertained. Bears are valued wildlife and need to be managed sustainably. The bear populations in Unit 22 are already low, and seasons and bag limits are liberal. Allowing hunting of brown bears in summer when the hides are worthless, and when they are easily killed on salmon streams, is wasteful, and at odds with the Department's broad mission. This would spark negative publicity for the Department, and for hunters.

PROPOSAL 30 - 5 AAC 85.020. Hunting seasons and bag limits for brown bear. Establish a harvest objective for brown bear in the Noatak National Preserve.

Establish a 3-year mean, annual total human-caused mortality limit of < than 8 percent for adult bears (i.e. > 2 years old).

Based on the most recent population estimate, the total allowable human-caused mortality would be < than 23 adult bears harvested in the Noatak National Preserve per year.

Position: *We support* this proposal.

Reason: There should be scientifically justified harvest objectives for all managed game in the state. There are specific population and harvest objectives for ungulates, but not always for other big game, such as brown bears. This proposal presents a sound, objective guideline for managing the brown bear population in Noatak National Preserve.

PROPOSAL 35 - 5 AAC 92.125. Intensive Management Plan. Approve an intensive management plan for moose in Unit 15A

Position: *We oppose* this proposal.

Reason: Nearly 80% of Unit 15A is a federal wildlife refuge where wolf control cannot take place. Wolf control here is a waste of time and money, not only because most of the unit is off limits to aerial shooting, but because wolves aren't the problem. Harvest objectives for moose were set when the moose populations were near their peak, 30 years after massive wildfires in 15A stimulated moose browse. The carrying capacity of the habitat has declined since, and the number of moose that can be sustainably harvested has declined as well (range condition surveys by ADF&G support this). The Board should adjust the harvest quotas downward, consistent with habitat carrying capacity. Meanwhile, efforts to stimulate browse production via habitat management should be promoted.

PROPOSAL 36 - 5 AAC 92.125 Intensive management implementation plan. Approve an intensive management plan for moose in Unit 15C.

Position: *We oppose* this proposal.



Audubon Alaska report

5

Reason: The moose population in 15C is within intensive management population objectives, and has been increasing steadily since the early 1990s (40% since 1992). Moose hunting regulations have resulted in a chronic overharvest of bulls. The board has responded by changing the definition of a legal bull to protect more bulls. This, ironically, has the effect of dropping the expected bull harvest below the intensive management objectives, thus triggering wolf control. In essence, the board passed a regulation restricting harvest so severely that predator control CAN be called for, even when the Moose population is increasing. This is an inappropriate application of the intensive management law in our view.

PROPOSAL 38 - 5 AAC 92.037. Permits for falconry. Modify the falconry regulations and the Alaska Falconry Manual to meet federal standards for certification by the USF&WS as follows:

Position: We *oppose* this proposal.

Reason: We do not support the importation of exotic, non-indigenous wild raptors into Alaska. There is no need to add 24 new species that can be kept by private persons as captive animals for their personal enjoyment. The same rationale the board applies to wild mammals should be applied to wild birds. There is no justification or explanation given for the 13 paragraphs that will be deleted from the existing regulations. With what's provided, we see no argument for the loosening of restrictions the deletions represent. These do not appear to be required to meet federal standards for certification, contrary to the stated purpose of the proposal.

PROPOSAL 39 - 5 AAC 92.037. Permits for falconry. This proposal changes state falconry regulations to comply with new federal falconry standards, eliminates a joint federal-state permit requirement and replaces it with a state-only permit and makes other adjustments regarding take, import/export, facilities, and other aspects of falconry.

Position: We *support* this proposal, with amendments.

Reason: This proposal addresses the same need as the prior, but it is put forward by the Department, and maintains a slightly greater measure of protective control and regulation. It adds many fewer species to the list of approved birds, but still allows the importation of non-indigenous species. We see no compelling reason for this, and recommend dropping items (15) and (16) from the list of approved species. The chance that a non-indigenous bird might escape and intermingle with native birds is admittedly low, but the adverse consequences of such escape are very high (interbreeding, disease, parasites). We see no compelling need to allow this to occur, and urge the board to exercise consistency between how they treat exotic birds and exotic mammals being brought into Alaska.

PROPOSAL 40 - 5 AAC 92.037. Permits for falconry. Allow nonresident falconers to capture raptors.

Position: We *oppose* this proposal.



Reason: This proposal would open the door to non-residents to capture our raptors, and take them out of state. Alaska has a very special stature as a state with magnificent wildlife resources. It is in this board's hands to preserve that character. We find the emotional appeal of the American Falconry Association unpersuasive. Of course, their members would cherish the adventure of coming to Alaska, and the experience of going to a remote wild place to take a wild bird from its nest. But that bird will leave Alaska in a cage, live out its life in a muse, and be fed from a bowl. Flying/hunting for these birds will be limited, and at the owner's convenience. The falconer will certainly spend some money in Alaska, but that is hardly justification for allowing the taming and export of our wildlife. Alaska currently has quite generous allowances for falconry in this state. If an individual from outside is bent on having one of Alaska's Gyrfalcons, or Peregrine Falcons in their possession, they can move to Alaska and become an Alaska resident. This board should never allow the capture and export of Alaska's wildlife into private hands for personal enjoyment and/or commercial gain.

PROPOSAL 44 - 5 AAC 92.052. Discretionary permit hunt conditions and procedures.

Add a new discretionary authority that would allow the department to define specific seasons and methods and means of hunting for recipients of Governor's tags.

Position: We oppose this proposal.

Reason: Giving discretion to advance an opening date 1 week would confer an appropriate advantage, and be reasonable. Allowing same day airborne, hunting from helicopters, shooting from boats, or other currently prohibited methods and means would not. Suggesting all species will benefit because there is revenue associated with these tags is illogical. Increased revenue may fund agency staff or operations but it does not automatically equate to sound management. This proposal needs to be rejected, or amended, so the discretion is limited, and proscribed by the Board.

PROPOSAL 45 - 5 AAC 92.200. Purchase and sale of game. Align state regulations on subsistence bartering with statutory authority.

Position: We oppose this proposal.

Reason: This proposal doesn't really "align" anything, or permit barter of new species. The only change this proposal makes it to allow *the export* of Caribou outside of GMUs 22-26. This is the entire northern half of the state, where the vast majority of caribou populations and harvest occur. Villages in this area are currently able to barter under the existing regulations. If changed, caribou meat could be transported in quantity to Fairbanks, Anchorage and other urban centers and traded. There is a reindeer industry specifically for the commercial use of reindeer/caribou. There is no need to encourage commercialization of caribou hunting.

PROPOSAL 48 - 5 AAC 92.200. Purchase and sale of game. Prohibit the sale of bear parts harvested on National Park Service lands.

Position: We support this proposal.



Audubon Alaska report

7

Reason: We do not think black bears should be harvested for the purpose of selling their meat, gall bladders, skulls, claws, hides or other parts. We don't think this is wise anywhere, but in National Parks and Preserves, it is especially inappropriate. Support of this proposal will not restrict hunting opportunity.

PROPOSAL 94 - 5 AAC 92.095 Unlawful methods of taking furbearers; exceptions.

Prohibit the taking of wolf, fox, wolverine, or coyote during May, June and July on National Park Service lands.

Position: We *support* this proposal.

Reason: Taking furbearers during the summer months is wasteful of the wildlife resource. The pelts are not prime, and survival of dependant young will be reduced. Allowing harvest during these months is a form of predator control, not true hunting and trapping. The incidental take of non-target species in snares and traps during this time of year has a negative effect on those species.

PROPOSAL 97 - 5 AAC 92.080. Unlawful methods of taking game; exceptions; 92.085 Unlawful methods of taking big game; exceptions; 92.090 Unlawful methods of taking fur animals; 92.095 Unlawful methods of taking furbearers; exceptions. Prohibit the use of artificial light for taking game on all lands managed by the National Park Service.

Position: We *support* this proposal.

Reason: We see no reason to allow artificial lights to be used in any hunting, much less on NPS lands. If the purpose is to take bears in dens, as suggested, we find it difficult to classify this as a hunting activity. Certainly, it reflects poorly on those who practice it for sport.

PROPOSAL 101 - 5AAC 92.095. Unlawful methods of taking furbearers; exceptions; and 92.090. Unlawful methods of taking fur animals; exceptions. Allow same day airborne taking of coyotes statewide.

You may take coyotes the same day you have been airborne with no restriction on the distance you are from the aircraft.

Position: We *oppose* this proposal.

Reason: This is land-and-shoot predator control. It requires a determination by this board that the intensive management law is triggered, and some analysis by the department that such action is warranted and likely to be effective. It should not be approved or passed in this form.



PROPOSAL 105 - 5 AAC 92.130. Restrictions to bag limit. Clarify the definition of wounded as it applies to the restrictions to bag limits:

Statewide, for any animal in which the Board of Game believes that a wounded animal should count against the bag limit for that species, simply insert the word MORTALLY in front of wounded in the regulation. So the new regulation would read "**any animal mortally wounded and not recovered must count against the bag limit**".

Position: We *oppose* this proposal.

Reason: Obviously, any hunter who wounds and does not recover an animal can decide in their own mind that the animal was not "mortally" wounded. This will encourage hunters to shoot at animals in dim light or at long distances, knowing that wounding does not count against their bag limit. It will also discourage hunters from pursuing wounded animals in the field, if they know they can just shoot at the next. Absent the recovery of a carcass, determining mortal wounds from non-mortal wounds would be essentially impossible for the troopers to enforce.

PROPOSAL 106 - 5 AAC 92.130. Restrictions to bag limit. Count wounded muskox, bison, sheep and goat that are not recovered as the bag limit.

Position: We *support* this proposal.

Reason: For the reasons given in proposal above (105), we support counting wounded animals of all big game species against the bag limit.

PROPOSAL 108 - 5 AAC 92.260 Taking cub bears and female bears with cubs prohibited. Prohibit the harvest of cubs and sows accompanied by cubs on National Park Service (NPS) lands:

5 AAC 92.260 Taking cub bears and female bears with cubs prohibited

Position: We *support* this proposal.

Reason: There is a long-standing and well-reasoned tradition of not harvesting cubs, or sows with cubs. The loss of a sow with cubs of the year translates into the loss of the cubs as well (to starvation or depredation). And the shooting of a cub has minimal trophy or subsistence value. This activity represents a form a predator control, and should be rejected absent an analysis of need and effectiveness. It is particularly inappropriate on NPS-managed lands.



PROPOSAL 109 - 5 AAC 85.015. Hunting seasons and bag limits for black bear. Clarify and remove complicated or excessively restrictive regulations and ADF&G discretionary provisions pertaining to black bear hunting.

Units 6-26 (except Unit 6C & D and 14C) Residents and nonresidents: No Closed Season

Units 6-26 (except 6D & C and the coastal areas of 15&7 as defined at the March 2011 Board of Game meeting) Residents and nonresidents:
Bag Limit - 3 bears

All intensive management areas where black bears are recognized as contributing to the decline of prey species:
Bag Limit - No Limit

Position: We *oppose* this proposal.

Reason: Proposals to have no closed season and no limit are in conflict with sound management principles, can decimate bear populations, to the detriment of guides and future sport hunters, and would lead to unacceptable waste of a highly valued game resource. Allowing a nonresident hunter to kill 3 bears, or in an "intensive management area", to kill an unlimited number of bears, throughout the year, translates into wanton waste of a valuable big game animal.

PROPOSAL 116 - 5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures. In addition to the 10 bait sites in total, guides and assistant guides may also have two personal sites each; guides and assistant guides may hunt all sites for personal use without guide client agreements.

A registered guide-outfitter may register 10 bait sites at the same time and the assistant guides may help place and maintain those 10 baits **in addition to the two baits each they may register for personal or business use. The guide or assistant guides may/or may not hunt the 10 baits personally or with friends without a guide client agreement.** (Take your pick but make it clear.)

Position: We *oppose* this proposal.

Reason: This simply allows 2, 4, or 6 more sites to be established (depending on number of assistant guides employed) for "personal or business" use. There is no need to expand any operation beyond 10 bait sites. This will needlessly contribute to the habituation of "nuisance" bears, effectively trained to seek out human-provided food sources.

PROPOSAL 117 - 5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures. Remove the requirement for guides to personally accompany resident clients at a black bear bait stations.

Position: We *oppose* this proposal.



Reason: This reduces guides to unskilled laborers, whose job is to simply maintain bait stations for rent to others. It will result in a devaluation of the guides service, a lowering of rates, and harm to other guides who might see accompanying clients in the field as an integral part of their business.

PROPOSAL 120 - 5 AAC 92.115. Control of predation by bears. Eliminate black bear baiting as a method requiring a predator control permit in predator control areas.

Position: We *oppose* this proposal.

Reason: The proposal would eliminate any bag limit for black bears taken over bait in predator control areas, and reduce the information the Department needs to assess the effectiveness of the predator control program. We don't believe this is prudent or responsible, and certainly not scientific wildlife management.

PROPOSAL 121 - 5 AAC 92.044 Permit for hunting black bear with the use of bait or scent lures. Prohibit black bear baiting on all National Park Service lands.

Position: We *support* this proposal.

Reason: There is no need for this practice on NPS lands. It is viewed as unethical by a large number of Americans. It also habituates bears to human food, which makes them a threat to park visitors, back-country hikers, and a threat to public safety near campgrounds.

PROPOSAL 124 - 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions. Require trap identification for all Units on lands managed by the National Park Service.

Position: We *support* this proposal.

Reason: This is standard practice most states outside Alaska. Trappers should be willing to be identified with their sets. This requirement is appropriate on all public lands.

PROPOSAL 125 - 5 AAC 92.095 Unlawful methods of taking furbearers; exceptions. Require a 72 hour trap check for all traps and snares set on National Park Service lands.

Position: We *support* this proposal.

Reason: Most responsible trappers check their traps every 24-72 hours to ensure the value of the pelt is maintained. We believe this is both humane and prudent from a management standpoint. Trapping is under fire from critics around the US and the world as inhumane. Instituting a requirement like this would go a long way towards buffering that criticism.

PROPOSAL 126 - 5 AAC 92.095 Unlawful methods of taking furbearers; exceptions. Prohibit the trapping of black bears in all National Park Service managed lands.



Audubon Alaska report

11

Position: *We support* this proposal.

Reason: We consider black bears to be a valued big game species. Trapping and snaring it as a common furbearer is wasteful, dangerous, and inhumane. This form of "management" is especially inappropriate on NPS lands.

PROPOSAL 127 - 5AAC 92.095(a)(20). Unlawful methods of taking furbearers; exceptions.
Prohibit the taking of a black bear by trap or snare.

Position: *We support* this proposal.

Reason: see reasons for 126, above.

PROPOSAL 128 - 5 AAC 92.051. Discretionary trapping permit conditions and procedures. Establish a tag and fee to allow trappers to retain incidental catch.

Position: *We oppose* this proposal.

Reason: Giving trappers the option of paying 10 dollars to keep each moose, caribou, or deer that they capture in a snare will simply reward and encourage an undesirable aspect of trapping. Trapping ungulates, even unintentionally, should not be a surrogate for hunting, and this proposal would make it so.

PROPOSAL 131 - 5 AAC 92.125. Intensive Management Plans. Add bear population reduction to the Unit 19A predation control program.

Position: *We oppose* this proposal.

Reason: The Department originally thought wolves were the problem. They reduced wolves by 60%. Now, they claim black bears and grizzly bears are the problem. If the Department's own estimates are correct, we have 200 Grizzly bears and 2,500-3,000 black bears. The proposal says the efforts will focus near the road system. That may be true, but of course, the bears from beyond the road system will simply move in to fill the void. This proposal has a very low likelihood of success. It will only give hunters a black eye.

PROPOSAL 141 - 5 AAC 84.270. Furbearer trapping.; 92.0XX Black bear trapping requirements.; 92.051. Discretionary trapping permit conditions and procedures.; 92.080. Unlawful methods of taking game; exceptions.; 92.095. Unlawful methods of taking furbearers; exceptions.; 92.165. Sealing of bear skins and skulls.; 92.200 Purchase and sale of game.; 92.220. Salvage of game meat, furs, and hides.; 92.990 Definitions.; and 99.025. Customary and traditional uses of game populations. Implement black bear trapping regulations as follows:

Position: *We oppose* this proposal.



Reason: The proposal allows an unlimited number to be taken by each "trapper" from April 15 through October 15. We view black bears as a valued big game animal that is not appropriately considered a furbearer. Trapping and snaring over bait is not appropriate, safe, or humane for bears; and taking bears in summer renders the hides worthless. It allows trapping sows and cubs. It allows incidental take of brown bears. It requires dispatching entire family groups when one is caught in the snare. It requires allowing hunters to kill bears same day airborne. It allows an unlimited number of bucket snares. It does away with sealing requirements. It encourages this dangerous practice by NON-residents, and youth as young as 16 years old. This is simply predator control (and crude, ineffective predator control at that). Managing for unlimited take abuses the Department's mission to manage and conserve *all* wildlife for beneficial use and enjoyment of the residents of the state.

PROPOSAL 142 - 5 AAC 84.270 Furbearer trapping. Prohibit trapping of black bear in the Interior region.

Position: We *support* this proposal.

Reason: See reasons for opposing Proposal 141, above. We concur with the reasons for support offered in the proposal.

PROPOSAL 144 - 5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures. Allow for same day airborne hunting of black bear over bait in Region III.

Position: We *oppose* this proposal.

Reason: The only way a person can maintain a remote bait station that is accessible primarily by air is to fly bait to it. That also requires the bait station be near the strip. That requires any human who uses that strip, hunter or not, will be camping near food-habituated bears. This proposal usurps a valuable public resource (a remote bush strip) and turns it into an exclusive hunting spot for a guide with a bait permit. It is neither fair nor safe to other users.

PROPOSAL 146 - 5 AAC 85.060. Hunting seasons and bag limits for fur animals; and 84.270. Furbearer trapping. Open year-round coyote seasons in Region III.

No closed season and no bag limit for coyotes either hunted or trapped.

Position: We *oppose* this proposal.

Reason: There is no evidence that coyote predation is limiting any of the species the proposal speaks to. Nor is there any evidence that opening the season year round and having an unlimited bag limit would meet the person's objectives. This is predator eradication with no sound logical basis. It should not be supported given the complete lack of scientific backing.

PROPOSAL 147 - 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions. Allow the use of helicopters for access to trapping in Region III.



Audubon Alaska report

13

Position: We *oppose* this proposal.

Reason: Accessing your trap line with helicopters? Really? The lower 48 press would have an absolute heyday with this one.

PROPOSAL 158 - 5 AAC 92.125. Predation control areas Implementation programs.
Implement a predator control plan for the range of the Mulchatna Caribou Herd.

Develop a comprehensive and cooperative Mulchatna Caribou Herd rebuilding plan under Intensive Management. Under Intensive Management it should include a Predator Control for both bears and wolves in all of the game units that are in this herds Range. The Mulchatna Caribou Herd is well below the management objective for calf mortality and the large bull composition consists of 9 percent, the bull to cow ratio is 15:100 (Management objective- 35:100).

Position: We *oppose* this proposal.

Reason: The fact that there is a severely skewed bull-to-cow ratio (15:100) with only 9% large bulls in the population is obviously the result of excessive harvest of bulls by hunters, not wolf predation. The Department should alter the human harvest regulations before embarking on a predator control program to fix something that has little to do with predators.

PROPOSAL 159 - 5AAC 92.108. Identified big game prey populations and objectives.
Modify the population objective for Mulchatna caribou.

Position: We *oppose* this proposal.

Reason: The population objectives should be established based on the range's ability to support a population at carrying capacity. That requires some study, and some data. This proposal reflects the thinking that by *saying* the number of prey available for harvest should be larger, the Board will be able to make that happen, presumably (again) through predator control.

PROPOSAL 163 - 5 AAC 92.125. Intensive Management Plans. Authorizes a predator control program in a small portion of Unit 24B.

Position: We *oppose* this proposal.

Reason: There are no specific data given to support this proposal beyond mention of anecdotal evidence of declining moose populations. If a link to the supporting documentation is promised, it should link to the specific plan, not a general ADF&G Board of Game page. We were unable to find the plan after exploring a number of links. There is insufficient information presented to support approval of this proposal.



Audubon Alaska report

14

PROPOSAL 166 - 5 AAC 85.056. Hunting seasons and bag limits for wolf. Lengthen the wolf hunting season for residents and nonresidents in Unit 21.

Wolf: Open season, August 10 - May 31 [APRIL 30]

Position: We oppose this proposal.

Reason: There is no evidence in this GMU of a declining moose population, or of wolves being a limiting factor on the moose. Moose harvest falls within management objectives. This proposal is not based on any demonstrable need, but rather, is simply an "anti-wolf" proposal.

PROPOSAL 168 - 5 AAC 92.085. Unlawful methods of taking big game; exceptions. Allow brown bears to be harvested with bait in Unit 21D.

Position: We oppose this proposal.

Reason: Hunting over bait only works in close proximity to roads and strips where the station can be maintained. It is not an effective means of controlling bears over large areas. It habituates bears to human food, and emboldens bears to come near towns and break into cabins. This is an unsafe and ineffective proposal.

PROPOSAL 196 - 5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures. Allow brown bear baiting with same season and restrictions as black bear baiting.

Position: We oppose this proposal.

Reason: Same reasoning applied to proposal 168, above.

PROPOSAL 197 - 5 AAC 92.125. Predation control areas implementation programs. Re-implement the grizzly bear control portion of the UYTPCP in Southern Unit 20E, and allow bear snaring and same day airborne taking of bears.

Position: We oppose this proposal.

Reason: The moose population in Unity 20E is increasing. There is no basis for implementing baiting and snaring programs for grizzly bears when prior experience has shown this to be dangerous and very ineffective in terms of meeting management goals. It simply invites criticism of Alaska's wildlife managers, with no significant benefit.

(end of Comments by Audubon Alaska)





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

30 December 2011

Cliff Judkins
Chair
Alaska Board of Game
ADF&G Board Support
P.O. Box 115526
Juneau, AK 99811-5526

Re: Support for proposals 48, 93, 94, 97, 108, 121, 126; Oppose proposals 44, 46, 107 and 130.

Dear Chairman Judkins,

Wildlife is one of America's great resources. Nowhere is wildlife more protected and encouraged to exist in a natural condition than in our national parks – especially here in Alaska. Unfortunately on national preserve lands managed by the National Park Service, the National Parks Conservation Association (NPCA)¹ has recognized a disturbing trend in the state of Alaska's predator management, especially wolves and bears, that runs counter to National Park Service mandates for sustaining natural conditions². This trend favors liberalizing sport hunting harvest methods and means, as well as liberalizing seasons and bag limits, to promote an increased take of wolves and bears with an assumed result of higher population densities of moose, caribou and other wildlife for the purpose of human consumption.

While the state has chosen an Intensive Management strategy that places human consumption as the top priority for wildlife use on its own land, the state's Intensive Management and Maximum Sustained Yield mandate directly conflicts with National Park Service Management Policies that disallow the manipulation of one wildlife population to benefit the population of another, hunted, species³. Managing this conflict between wildlife management purposes

¹ 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. Founded in 1919, NPCA has more than 340,000 members of which 1,000 reside in Alaska.

² A full review of federal legal mandates is included as Appendix A of this letter.

³ Management Policies at 4.4.2 "The Service does not engage in activities to reduce the numbers of native species for the purpose of increasing the numbers of harvested species (i.e., predator control), nor does the Service permit others to do so on lands managed by the National Park Service."



requires cooperation and collaboration between the state and the federal government as detailed in the 1982 Master Memorandum of Understanding.

A simple place to illustrate cooperative wildlife management between the state and federal governments is recognizing that hunting regulations should be codified in one set of government regulations, not two. We strongly suggest that this single set of hunting regulations reside with the state.

Through the Board of Game, the State of Alaska sets sport hunting regulations. Where sport hunting is permitted on lands managed by the National Park Service (in Alaska those are national preserves), the National Park Service accepts all "non-conflicting"⁴ state rules as their own. Historically, the National Park Service has only requested exemption from certain state regulations when NPS feels proposed state of Alaska regulations would conflict with NPS management policies, a request frequently ignored by the Board of Game. Our research shows at least 52 times that NPS was ignored when it requested regulation changes affecting wildlife on NPS lands or exempting NPS lands altogether from regulations formally adopted by the Board of Game between 2001 and 2010.

When conflicting regulations are adopted by the state of Alaska over the objection of the National Park Service, NPS is then forced to address the conflict by special federal regulation, most often through the Compendium process as was done to exempt Denali and Gates of the Arctic national preserves from a spotlighting for black bear regulation adopted by the Board in fall 2009.

Recognizing that some state rules conflict with national park service policy, NPCA advocates that any exceptions to state hunting rules for NPS managed lands be included in state, not federal, regulations. This makes it easier for the hunting public to comply with federal and state harvest regulations when they are found in one place. However, implementing this suggestion would require an increased level of cooperation by the state of Alaska. Simply put, when the Park Service requests that certain proposed hunting rules be exempted on NPS managed lands, the state needs to cooperate by agreeing to the requested exemption. That exemption then appears in state hunting rules, making it far easier for the hunting public to comply with federal and state harvest regulations.

With this basic premise in mind – keeping NPS-specific hunting rules and exemptions in state regulation and listed in the official State of Alaska hunting regulation guide - the National Park Conservation Association asks the Board of Game to support proposals 48, 93, 94, 97, 108, 121, and 126. In support of these proposals, we'd like to review the basic premise that some state hunting regulations could conflict with National Park Service laws and regulations and, therefore, NPS lands should be exempt. A full review of NPS legal wildlife mandates is found in Appendix A of this letter.

⁴ See 36 CFR 13.40(d) which states: "Hunting and trapping are allowed in national preserves in accordance with applicable Federal or non-conflicting state law and regulations"



Alaska Hunting Regulations Must Be Non-Conflicting with Federal Legal Mandates

The legal mandates for harvesting wildlife in national preserves are found in the Organic Act and the Alaska National Interest Lands Conservation Act (ANILCA) and codified in 36 CFR 13.40(d) which states:

"Hunting and trapping are allowed in national preserves in accordance with applicable Federal or non-conflicting state law and regulations" (emphasis added).

In managing hunting on national preserves, we are confident that the National Park Service fully understands that its mission is to conserve healthy wildlife populations⁵ in accordance with the direction set forth in ANILCA, the Organic Act, the Management Policies, DOI direction and other applicable laws and regulations, as reviewed in Appendix A of this letter. As such, when the state of Alaska proposes new hunting laws or regulations for Game Management Units (GMU) that include all or portions of national preserves, the standard by which the Park Service evaluates these proposed new laws and/or regulations is one of "non-conflicting" with the Management Policies, ANILCA or the Organic Act.

To ensure that there is no conflict, the Management Policies call for consultation with states on harvest policy. In Section 4.4.2,

"the policy calls on the Service to consult with state agencies on certain fish and wildlife management actions and encourages the execution of memoranda of understanding as appropriate to ensure the conduct of programs that meet mutual objectives as long as they do not conflict with federal law or regulation."

Key words in this policy are "mutual objectives" that "do not conflict with federal law or regulation." Under the terms of the existing Management of Understanding between the NPS and the State of Alaska, we believe the Park Service has attempted to ensure that mutual objectives are met by submitting timely and detailed comments on proposed regulation changes to the Alaska Board of Game. However when the state of Alaska does not live up to its side of the agreement by ignoring Park Service protests over proposed new hunting regulations that **do conflict** with federal law or regulations, the Park Service is forced to take action within

⁵ In the Federal Subsistence Wildlife Regulation annual guide, NPS defines Conservation of healthy populations of wildlife as the maintenance of wildlife resources and their habitats in a condition that assures stable and continuing natural populations and species mix of plants and animals in relation to their ecosystem, including the recognition that local rural residents engaged in subsistence uses may be a natural part of that ecosystem; minimizes the likelihood of irreversible or long-term adverse effects upon such populations and species; ensures the maximum practicable diversity of options for the future; and recognizes that the policies and legal authorities of the managing agencies will determine the nature and degree of management programs affecting ecological relationships, population dynamics, and the manipulation of the components of the ecosystem.



its own regulatory regime, creating confusion for the hunter while doing what it must to protect park resources.

Furthermore, National Park Service Management Policies in Section 4.4.2 make in abundantly clear that the manipulation of wildlife populations is not allowed:

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

The express ban on predator control was further clarified in a letter from the Assistant Secretary of Fish, Wildlife & Parks to Gerald Nicholia, Chair of the Eastern Interior Alaska Subsistence Regional Advisory Board on December 19, 2005:

"...undertaking intensive management practices, including predator control activities as conducted by the state of Alaska, is not allowed on NPS lands."

In summary, preserves in Alaska are bound to the Organic Act as well as to ANILCA and they are managed under the same Management Policies as parks in the Lower 48. Direction in ANILCA, the Management Policies, and from the Secretary's Office make it clear that while harvesting wildlife in national preserves can occur, it cannot deplete healthy populations or unacceptably impact natural processes, natural distributions, densities, age-class distributions or behaviors, and harvest cannot be done for the purpose of increasing the densities of one species at the expense of another for the sole purpose of manipulating certain wildlife populations that benefit increased rates of human consumption,.

Comments on specific proposals:

Proposal #125: NPCA requests the withdrawal of our proposal #125: Checking traps in national park lands. NPCA has determined that the time for checking traps is best left to a specific park determination, not statewide.

In light of the legal mandates prohibiting NPS from allowing the manipulation of wildlife populations, NPCA supports all requests by the Park Service to modify proposals and/or exempt NPS lands from proposed new hunting regulations that NPS considers conflicting with its laws and regulations. In furtherance of this position, NPCA has proposed and urges the adoption of the following seven proposals we submitted for consideration at this statewide meeting:

Proposal #48: SUPPORT

Prohibit the Purchase and Sale of Game Meat on NPS lands. Amendments to the Alaska Administrative Code in 2010 allow for the sale of black bear meat if harvested using a trapping



license. The reason the Board cited for allowing the legal sale of black bear meat under a trapping license was to encourage increased trapping to facilitate manipulation of black bear populations. By promoting financial incentives for harvesting black bears, the Board is assuming it will increase population densities of moose and/or caribou which subsequently may result in higher rates of harvest by humans.

This artificial manipulation of wildlife population densities is contrary to and conflicts with National Park Service policies prohibiting such wildlife population manipulation and, as such, NPS lands should be exempt from any authorization by the Board allowing the legal sale of bear parts. Furthermore, NPS has a regulation that prohibits the sale or commercial use of natural products that would conflict with the sale of game meat⁶. An NPS exemption to this state sanctioned activity would make it clearer to the hunter what is and isn't allowed on NPS lands.

Proposal #93: SUPPORT

Prohibit the Taking of Big Game Under a Trapping License/Trapping With a Gun on NPS lands. Excessively liberal trapping regulations allow for the use of a firearm to "trap" free-roaming wolves and wolverines. As distinguished from using a firearm to dispatch a wolf or wolverine caught in a steel trap, which we are not challenging, current trapping regulations allow for the use of a firearm as the primary trapping device. Allowing the use of a firearm to harvest a free roaming wolf or wolverine effectively removes the distinction between trapping and hunting and compromises the conservation strategy of state and federal land managers.

Federal Subsistence Regulations are clear that the use of a gun to take "free-ranging furbearers with a firearm on NPS lands" is not allowed. The Board of Game needs to make the same distinction for non-subsistence trapping managed by the state. On at least one other occasion, NPS has asked for this distinction to be made (August 29, 2010 letter from NPS to BOG), but that request was ignored. The only reason to allow trapping with a firearm is to increase the opportunistic harvest of furbearers with the assumption of increasing harvest opportunities for moose and caribou. This manipulation of wildlife populations is contrary to and conflicts with National Park Service policies prohibiting such wildlife population manipulation and, as such, utilizing a firearm for trapping on NPS lands should comply with long standing NPS subsistence regulations and only be permitted to dispatch an animal already caught in a steel trap.

Proposal #94: SUPPORT

Prohibit Trapping During Denning Months on NPS lands. Trapping on National Park Service lands should only be authorized during those months that offer the highest quality pelt for the trapper. This request is consistent with Federal Subsistence Regulations that prohibit trapping that "disturbs or destroys a den." Allowing the harvest of a wolf, fox, wolverine or coyote in

⁶ 36CFR 2.1(c)(3)(v)



May, June or July when the pelt is not prime and the animals are denning with young can only be ascribed to wildlife population manipulation for the purpose of creating more moose and caribou for human consumption. Not only does trapping during these months harvest a sub-prime pelt, but it also reduces the survivability of any young dependent upon adults that are trapped. This manipulation of wildlife populations is contrary to and conflicts with National Park Service policies prohibiting such wildlife population manipulation and, as such, lands managed by the National Park Service should be exempt from state regulations that allow the taking of furbearers during May, June and July. Currently GMUs 12, 19, 20 and 25 that include parts of Wrangell-St. Elias, Denali, Lake Clark and Yukon-Charley Rivers national preserves all have seasons ending May 31 and GMU 9, which includes parts of Katmai and Lake Clark, have a season that ends June 30, a time of year when dependent young are in the den.

Proposal #97: SUPPORT

Prohibit the Use of Artificial Light for Taking Game on NPS lands. The only reason to use artificial light for harvesting wildlife is to increase the likelihood of harvest success for targeted species, like bears in their dens, on the assumption that it will increase population densities of moose and/or caribou which subsequently may result in higher rates of harvest by humans.

In 2010, regulations allowing the use of artificial light in GMUs 19 and 24 that include Gates of the Arctic and Denali national preserves were adopted over the objection of the National Park Service for the stated purpose of increasing bear harvests in the den, including sows and cubs, for the assumed benefit of increased densities of moose. Subsequent regulatory action by NPS closed those two national preserves to the objectionable practice. This action by NPS is consistent with Federal Subsistence Regulations that prohibit the use of artificial light when taking wildlife. And on at least two occasions (letters from NPS to BOG dated August 29, 2011 and February 18, 2011) NPS has requested that their lands be exempt from state regulations allowing the use of artificial light. This manipulation of wildlife populations is contrary to and conflicts with National Park Service policies prohibiting such wildlife population manipulation and, as such, NPS lands should be exempt from the use of artificial light for taking game. (Should the Board support proposal #100: Laser, Night-Vision or Spotlight for Coyotes, NPS lands should be exempt for the reasons described above).

Proposal #108: SUPPORT

Prohibit the Harvest of Cubs and Sows with Cubs on NPS lands. The only reason to allow the harvest of adult dependent bear cubs and female bears accompanied by adult dependent bear cubs is to facilitate the manipulation of the overall bear population by increasing the overall harvest of bears for the purpose of increasing moose and caribou populations. The harvest of sows and cubs defies recognized scientific principles for bear management. Why else would you shoot a bear cub if not solely to reduce bear population numbers. This is supported by written findings in the Board of Game's General Bear Management guidelines which say that sows and cubs should be protected from harvest "unless it is necessary to consider methods to increase bear harvests as a part of a bear predator control program." This kind of wildlife harvest has no place in a national park unit. The National Park Service has explicitly requested on at least



four occasions (NPS letters to BOG dated February 16, 2007, February 11, 2009, August 29, 2010, and February 18, 2011) that lands managed by NPS be exempt from this practice. This manipulation of wildlife populations is contrary to and conflicts with National Park Service policies prohibiting such wildlife population manipulation and, as such, NPS lands should be exempt from any regulation that authorizes the harvest of bear cubs and sows with cubs.

Proposal #121: SUPPORT

Prohibit Baiting and the Use of Scent Lures for Black Bears on NPS lands. Food conditioning of black bears by baiting is a concern where people recreate, and people clearly come from all over the world to recreate on lands in Alaska managed by the national park service. This concern is enhanced by the fact that bait station locations are not made available to the recreating public. The indiscriminate nature of bear baiting attracts all age classes of bear and conditions them to bait as hunters typically hold out for a trophy bear. As such, underage and other non-target bears eat at a bait station but then are not hunted – leaving bait conditioned bears to continue to roam in a unit of the national park system, a land classification where recreators are encouraged to enjoy and experience the wilderness and where negatively impacting natural foraging behavior of bears is illegal⁷. Not only is this a dangerous situation for other recreational users, but the very nature of baiting is to increase the overall harvest of bears for the purpose of increasing harvest opportunities for moose and caribou. In light of these concerns, the National Park Service on at least 4 occasions (NPS letters to the BOG dated February 16, 2007, February 11, 2009, August 29, 2010 and February 18, 2011) has requested that NPS lands be exempt from bear baiting and/or liberalizing changes to existing bear baiting regulations. Currently GMUs 5A & B, 11, 12, 13, 16A & B, and 17B include federal lands in Glacier Bay, Wrangell-St. Elias, Denali and Lake Clark national preserve lands where black bear baiting is allowed. This manipulation of wildlife populations is contrary to and conflicts with National Park Service policies prohibiting such wildlife population manipulation and, as such, NPS lands should be exempt from any black bear baiting or use of scent lures. (Should the board adopt proposals #122 or #123 – both having to do with scent lure – we request that NPS lands be exempt for the same reasons stated above).

Proposal #126: SUPPORT

Prohibits Trapping/Snaring of Black Bears on NPS lands. While the Board of Game has yet to set a black bear trapping season, statewide regulation authorizes this activity. The indiscriminate nature of any potential trapping/snaring of black bears is solely to increase overall harvest of black bears and does not contribute to the fair chase of animals for food or trophy purposes. Trapping/snaring of black bears will capture all age classes and genders. And even more importantly, it will snare brown bears, which results in brown bear mortality. This indiscriminate nature of harvest further emphasizes that the purpose of this activity is to manipulate black bear populations for the purpose of growing more moose and caribou. Federal Subsistence Regulations prohibit the taking of any bear by a trap and only furbearers

⁷ 36CFR 2.2(a)(2) clearly prohibits the feeding or disturbing of wildlife



can be taken by a snare, and also restricts the harvest of female dependent young. Furthermore, on 4 occasions (NPS letters to the BOG dated January 3, 2006, February 16, 2007, August 29, 2010, and February 18, 2011) NPS has requested that its lands be exempted from trapping or snaring bears. This manipulation of wildlife populations in contrary to and conflicts with National Park Service policies prohibiting such wildlife population manipulation and, as such, NPS lands should be exempt from any black bear trapping or snaring. (NPCA also supports Proposal #127: Prohibit the Taking of Black Bear by Trap or Snare).

In addition to these six proposals submitted by NPCA, we offer comments on the following:

Proposal #44: DO NOT SUPPORT

Governor's Tags don't have to abide by the same seasons and methods/means as the rest of us. Not abiding by the state's hunting regulations for Governor's Tags sends the wrong message to hunters everywhere that special privileges can be bought by the wealthy. Hunting regulations, even the ones we argue over, are set to provide for management of wildlife populations and need to apply to ALL hunters. The Alaska Constitution is unique in protecting this right with the "equal access clause". When hunting is provided for outside of those legal parameters, the very scientific basis upon which those regulations were adopted comes into question. We did away with the King's Forest with the U. S. Constitution. This proposal gives special consideration to a rich few, mostly out-of-state hunters while telling the rest of us we are not worthy.

Proposal 46: DO NOT SUPPORT

Allow the Sale of Big Game Trophies. The commercial sale of big game trophies will provide yet another financial incentive to increase the harvest of trophy animals, especially bears. With no tag needed to harvest a brown bear in much of the state, a hunter who might not otherwise take a brown bear now has the financial incentive to opportunistically harvest a trophy animal should the opportunity present itself in the field. This is yet another attempt to increase the harvest of bears for Intensive Management purposes. NPS regulations (36CFR 2.1(c)(3)(v)) explicitly prohibit the sale or commercial use of natural products taken from Park Service managed lands. Six years ago a similar proposal was before the Board and NPS commented at that time (January 13, 2006 letter from NPS to the BOG) that this kind of activity was illegal on federal lands and requested that this prohibition be included in statewide hunting regulation publications. We would make that very same request at this time and have the regulation include, should it be adopted at this meeting, that it does not apply to lands managed by the National Park Service.

Proposal #107: DO NOT SUPPORT

Eliminate Statewide Bag Limit for Black Bears. This proposal seems very over-simplistic and it lacks any scientific support. We would urge the Board to oppose the lifting of black bear bag limits statewide.



Proposal #130: DO NOT SUPPORT

Establishes a Predator Control Program for Unit 26B. Our concern with this proposal is that high harvest of grizzly bears on lands adjacent to National Park land (where sport hunting is not permitted) can lead to a negative impact on grizzly bear populations within the park. This "sink" effect has been recognized by ADF&G in other locations around parks – specifically in and around GMU 13 where the Department's 2007 Brown Bear Management Report (page 149) stated that after a decade of liberalized brown bear harvest:

"Immigration of bears from lightly hunted areas in GMU 13 or from adjacent Denali and Wrangell-St. Elias National parks, may be another reason for high harvests of brown bears may not have the predicted impact on bear populations." (emphasis added)

We are furthermore concerned that the decline in musk ox population cannot be so easily linked to grizzly bear predation. Other factors need to be taken into consideration before the gun sights are turned on grizzly bears. Other factors like disease, mineral (copper) deficiency and unfavorable weather events need to be considered when trying to determine why the musk ox population is declining and those factors need to be addressed. We are also aware of new research presented by ADF&G at the November 2011 Arctic and Western Regions Board of Game meeting held in Barrow about the impact of targeting large, mature males has on herd behavior and, ultimately, survival of young musk ox when threatened by predators. By targeting large males, is the BOG exacerbating the problem? That question must be answered before creating a predator control area and taking the easy way out by shooting grizzly bears. That is not the solution.

NPCA submitted detailed comments to the Board on August 20, 2010 about this very issue of reducing predation pressure on musk ox and we ask that that letter be included in the record of this meeting as well.

Thank you for the opportunity to comment.

Sincerely,



Jim Stratton

Alaska Regional Director



Appendix A: A Review of Federal Legal Mandates

Wildlife's importance to our park system is embodied in the 1916 National Park Organic Act that includes in the purpose of the park system the direction to

"...conserve the scenery and the natural and historic objects and the wild life therein..."

Protecting and preserving wildlife is reinforced in the Alaska National Interest Lands Conservation Act of 1980 (ANILCA) which states in Section 101(b):

"It is the intent of Congress in this Act to... provide for the maintenance of sound populations of, and habitat for, wildlife species of inestimable value to the citizens of Alaska and the Nation, including those species dependent on vast relatively undeveloped areas;"

Providing for wildlife populations and habitat in Alaska's parks is further defined in Section 815 (1) with specific language directing that national parks and monuments will be managed to sustain "natural and healthy" wildlife populations and national preserves managed to sustain "healthy" populations.

Maintaining healthy wildlife populations, however, does not preclude the Park Service from providing for both sport and subsistence hunting opportunities in national preserves, as directed by Congress in ANILCA Section 203⁸. Yet hunting in national preserves is allowed only when it is consistent with other purposes of the park system as set forth in ANILCA Section 1313:

"A National Preserve in Alaska shall be administered and managed as a unit of the National Park System in the same manner as a national park except as otherwise provided in this Act and except that the taking of fish and wildlife for sport purposes and subsistence uses, and trapping shall be allowed in a national preserve under applicable State and Federal law and regulation."

The key words here are "administered and managed as a unit of the National Park System in the same manner as a national park...under applicable State and Federal law and regulation." ANILCA makes it clear that, while Alaska has some unique provisions, its parks are to be treated like other units of the park system across the country. Management direction for the national park system in Alaska is firmly grounded in the 1916 Organic Act as reinforced in ANILCA

⁸ "That hunting shall be permitted in areas designated as national preserves under the provisions of this Act."



Section 203⁹. How Park Superintendents are to manage park wildlife pursuant to the Organic Act is found in the National Park Service Management Policies.

Management Policy 4.4.3 clearly sets out where the harvest of wildlife is allowed:

Where harvesting is allowed and subject to NPS control, the Service will allow harvesting only when (1) the monitoring requirement contained in section 4.4.2 and the criteria in section 4.4.2.1 above have been met, and (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*
- *Native species that the harvested species use for any purpose, or*
- *Native species that use the harvested species for any purpose*

Section 4.4.2.1 (mentioned above) explains that:

“removal (of plants and animals) will not cause unacceptable impacts on native resources, natural processes, or other park resources.”

And furthermore, Section 4.4.2 makes it abundantly clear that the manipulation of wildlife populations is not allowed:

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

In summary, preserves in Alaska are bound to the Organic Act as well as to ANILCA and they are managed under the same Management Policies as parks in the Lower 48. Direction in ANILCA, the Management Policies, and from the Secretary's Office make it clear that while harvesting wildlife in national preserves can occur, it cannot deplete healthy populations or unacceptably impact natural processes, natural distributions, densities, age-class distributions and behaviors, and harvest cannot be done for the purpose of increasing the numbers of harvested species (i.e. predator control).

⁹ “the Secretary shall administer the lands, waters, and interests therein added to existing areas or established by the foregoing sections of this title as new areas of the National Park System, pursuant to the provisions of the Act of August 25, 1916 (39 Stat. 535), as amended and supplemented”



To the Alaska Department of Fish and Game, Board of Game

Via fax (907) 465-6094

Regarding the following proposals:

Proposal 66, 67, 68. I support these proposals. Most other States restrict the number of non-resident permit hunters to maintain healthy stocks for the residents who live and support the stock year round.

Proposal 69 also touches on a process that is utilized in many Western States, that encourages hunters to try year after year for a permit even when repeatedly unsuccessful. This does not really increase our chances much of being drawn, but it would sure feel like it.

Proposal 78,79, 80, 81, 82,83, 84, 85, 86, 87, 88, 89, 90, 91. These proposals all support the expansion of resident sheep hunts and/or the limitation of non-resident sheep hunts. For a resource that is so important to resident hunters, I think these proposals present valid options aimed toward maintaining interest of the local hunters and making the resource available in a safer, less congested manner. I support this concept and these proposals as a conceptual start to a positive end.

Sincerely,

Shaune O'Neil
13214 E Wycoff Dr.
Palmer, AK 99645
Shaune@mntaonline.net





MICHAEL STRAHAN

POB 609
Delta Junction, AK 99737T 907-229-4501
F 907-895-4919
lostcreek@ak.netwww.outdoorsdirectory.com

December 28, 2011
 ATTN: Board of Game Comments
 Alaska Department of Fish and Game
 Boards Support Section
 P.O. Box 116526
 Juneau, AK 99811-8526
 Fax: 1 (907) 465-6094

Dear Board of Game members,

Please accept the enclosed as my written comments concerning Dall sheep proposals #78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90 and 91, which are up for consideration in the upcoming January 13-17 BOG meetings in Anchorage.

The Outdoors Directory website, which I own, has conducted a very lively discussion of these proposals, and though I have remained mostly neutral on such matters in the past, I elected to enter the discussion in hopes I could learn something of the process, and perhaps figure out if there was something I should be concerned about in this matter. It has been an enlightening process, with many who submitted proposals writing to us to express their views, including Mr. Wayne Heimer, Mr. Joe Want, and many others who have things to say about these proposals. Though these discussions have taken place in a public venue, I want to be clear that I am not speaking on behalf of Outdoors Directory or its many members. The following comments are my own and should be taken in that context.

I should mention that I hold registered guide license #967, which is currently up for renewal. I have not renewed because, quite frankly, I am getting to that time in my life where I am wondering how many more moose quarters I want to pack out on my back. I did some guiding for sheep, however I am not certified for GMU 20, which seems to be the focal point of the angst among some of our sheep hunters who are talking about severe hunting pressure in that area, and conflict between nonresident guided hunters, guides, and resident hunters. I am not approaching this from a guide's perspective per se, but as someone who is trying to see both sides of this issue and trying to come to terms with what we should do with these proposals. That said, here are my recommendations, together with my justification for my position:

Proposals #78-86: I recommend rejecting these proposals on the following grounds:

- *Insufficient data.* Recent data (brought to light by Joe Want) concerning the number of age-legal rams left on the mountain each year seems to the notion that hunters are killing all the legal rams each season. Because the information challenges previously-held perceptions of our Dall sheep populations, any decisions by the BOG made on the basis of the health of the resource should be suspended until the implications of this data are fully understood.
- *Meat care concerns.* An early Dall sheep season would occur in summertime conditions. Warm-weather hunts increase the likelihood of meat spoilage in the field, a problem exacerbated by the reality that hunters frequently must backpack meat out of remote areas, then have it flown out of the field, a process that can take several days.
- *Guide issues.* In terms of the allocation issue addressed by these proposals (residents are afforded benefits denied to nonresidents), no resource-based justification has been offered in support. GMU 20A, where most of



the issues are occurring, has been managed as a maximum opportunity area since our early days of sheep management. To reduce it to permit status eliminates a great nonresident hunting area. The proposals highlight issues related to overcrowding of guides, illegal harassment by guides against resident hunters, violations of the ethics codes pertaining to aerial spotting by guides and other issues related to guiding. It is my contention that these issues are better addressed on a case-by-case basis through hunter reports to the Big Game Commercial Services Board, rather than penalizing the entire industry. My preference is that we continue working on a solid Guide Concession Program that can stand up in court, rather than adopt measures that do little for the health of our sheep populations, and little for hunters themselves.

Proposals #79-91: I recommend rejecting these proposals on the basis of the following issues:

- *Data in question.* It appears that there are no resource-based reasons for going to a permit system for our non-resident or resident sheep hunters. Recent information has come to light through the work of Mr. Joe Want and Wayne Heimer, which casts a shadow on previously-held beliefs about our Dall sheep populations in much of Alaska. Owing to the significance of this information, I recommend the board reject these proposals in order to buy more time to study this data and draw valid conclusions about it. Mr. Want claims that we are leaving half of our age-legal sheep on the mountain every fall, and that needs to be examined. Granted, an age-legal sheep may not necessarily be full curl, and it appears that most hunters are targeting full curl rams. But there are many aspects of this data that need to be considered before we go down the pathway of offering even more permit hunts and the related complexity of our regulations (which are already too long and too confusing for a lot of folks).
- *Financial impact.* A statewide draw and cap on nonresident allocation would have potentially serious financial implications to both public and private sectors of Alaska's economy. Informal data posted on our site (outdoorsdirectory.com) suggests that many resident sheep hunters support tag fee increases to make up for this loss to the ADF&G budget, however there are no proposals before the BOG that address this aspect. Therefore proposals #78-91, if adopted, would result in a loss of revenue to ADF&G during a time when financial resources are already thin. The private sector losses cannot be addressed by the BOG in any fashion, however they could result in significant losses to many private businesses in the state (hotels, car rentals, sporting goods stores, restaurants, air charters and guides, to name a few).
- *Relevance of other permit systems.* There has been some discussion on Outdoors Directory concerning the permit system in place in other Western states, regarding bighorn sheep permit processes and resident / non-resident allocation. Some suggest that the Alaska program should mirror those in other states. I disagree. Alaska's Dall sheep population far exceeds the bighorn population in those states, and, unlike those states, it appears that we have plenty of Dall sheep in Alaska to meet hunter demand. There is, therefore, no comparison to Alaska's Dall sheep situation and the circumstances related to bighorns in other states.

Conclusions

This is the first time I have ever written to the BOG, and I appreciate this opportunity. I realize that despite my efforts to the contrary, there are probably many factors of which I am unaware. It is also possible that some of my conclusions are in error. I appreciate your patience with those things; my time is limited and I may have overlooked some things in the process of drafting this. On the other hand, these proposals represent a significant departure from the way we are managing our sheep population, and the way we are managing our hunters.

Thank you for your consideration,

Michael Strahan



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

December 29, 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: Winter Meeting, 2012

Dear Board Members:

Please consider the following comments I have regarding proposed regulations to be considered at your winter meeting.

Proposal 35 & 36. Oppose. These two proposals would if adopted provide for killing of wolves for no reason other than to increase hunter success rates regarding moose. I hike, ski, climb, or kayak on the Kenai Peninsula or on the waters next to it, and I like wildlife, including wolves. The killing of wolves for no reason other than to farm moose is something I oppose.

Proposal 43. Support. This proposal would encourage use of beaver flow devices in managing the occasional nuisance beaver. Beavers play an important part in the ecology of our streams, rivers, and waters. It is time they were appreciated and managed for multiple purposes, including as watchable wildlife and contributors to healthy ecosystems, rather than as a source of fur for a miniscule number of trappers.

Proposal 48. Support. This proposal would prohibit the sale of bear parts taken on National Park and Preserve lands. The sale of bear parts should be



prohibited as it was for many years. Recent changes encourage waste.

Proposals 92-93. Support, partially. These proposals would prohibit the taking of wolves and wolverine using firearm, that is, unless authorized by a specific hunting regulation. The purpose it seems is to assure tighter regulation of the numbers of these animals taken.

I am particularly concerned about maintaining viable populations of wolverine in Southcentral Alaska. I have enjoyed seeing wolverine in Denali National Park, the Gates of the Arctic National Park, and in Chugach State Park. Trapping outside these protected areas appears to have virtually eliminated them, and the job of the Department of Fish and Game is to conserve our wildlife. Stronger regulation of the taking of wolverine is needed.

Proposal 94. Support. This proposal would prohibit the taking of wolves, coyotes, fox and wolverine on National Park Service lands during the months of May, June, and July when these animals are near their dens and raising their pups. I like wildlife, and am appalled that Alaska would allow the killing of these animals in May, June and July when they are raising their young, and there is no value in their fur. Values are important, and for most Alaskans, the killing of mothers and leaving their new born infants to die is barbaric and inhumane.

Proposals 97. Support. This proposal would prohibit use of artificial light for hunting on National Park Service lands. The proposal should be adopted for all hunting in Alaska, and not only on NPS lands.

Proposal 98. Support. Electronics have no place in fair chase hunting.

Proposal 100. Oppose. This proposal would allow electronically enhanced night vision in hunting coyotes. Coyotes are not vermin.

Proposal 101. Oppose. This proposal would allow same day airborne hunting of coyotes statewide. Coyotes are not vermin. I like seeing wildlife in the back country, including coyotes.

Proposal 108. Support. The killing of cubs and sows accompanied by cubs is beneath the values of most Alaskans, including me. I hope that on National Park Service lands, at least, our wildlife can be conserved and appreciated for multiple reasons, including viewing, and the role they play in natural eco systems.

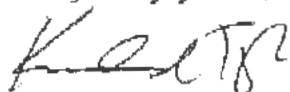


Proposals 124-126. Support. These proposals would be a step toward some minimal regulation of trapping on National Park Service lands. I oppose trapping in general because of the cruelty of the methods used, but if there is to be trapping in Alaska, then regulations reducing the suffering of target animals, and reducing the taking of non-target species should be adopted.

Proposal 127. Support. This proposal would prohibit the taking of a black bear with a trap or snare. Snaring and trapping bears is cruel and barbaric, and not in conformity with the values of most Alaskans, including me.

Conclusion. I have lived here 36 years and have participated in Board of Game meetings since 1997. I value wildlife for reasons other than meat, fur, and target practice. I have had very special times in seeing wolves, bears, wolverine, fox, moose caribou and other species in places such as Denali National Park and Chugach State Park. Outside of true refuges [and partial refuges], the chance of seeing wildlife is much lower, and the tundra is often trashed by ATV's used by hunters. I urge you, members of the Board of Game, to recognize the value of wildlife to Alaskans such as myself, and to our children and grand children.

Very truly yours,



Kneeland Taylor





THE WILDLIFE SOCIETY ALASKA CHAPTER

Kris Hundertmark, President
PO Box 757000
Fairbanks, AK 99775

29 December 2011

Cliff Judkins, Chair
Alaska Board of Game
c/o Board of Game Comments
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 11526
Juneau, AK 99811-5526

Dear Mr. Judkins:

The Wildlife Society is a non-profit, international organization of professional wildlife scientists, enforcement personnel, and managers dedicated to the sound stewardship of wildlife resources and the environments upon which wildlife and humans depend. The Alaska Chapter is an affiliate organization of over 200 wildlife professionals living and working in Alaska. The Chapter is in the process of finalizing a position statement that brings attention to risk of disease transmission from domestic animals and recommends practices to maintain the health of wild populations of Dall's sheep and mountain goats in Alaska.

The Alaska Chapter of TWS fully **supports Proposal 102** that prohibits use of pack animals other than horses by people that are hunting Dall's sheep and mountain goats. If adopted, this proposal will reduce the likelihood of disease transmission between domestic livestock and wild sheep and goats. Diseases transmitted by domestic livestock are a major cause of mortality and reduced reproduction in bighorn sheep populations in western North America, and have resulted in extirpation of some populations. Respiratory diseases such as pneumonia are a serious problem which have often caused widespread die-offs in bighorn sheep following contact with domestic sheep. To limit disease introduction, wildlife managers have placed an increased emphasis on establishing and maintaining separation between bighorn sheep and domestic sheep and goats. Alaska has not had widespread domestic livestock grazing or use of pack animals other than horses, so a proactive and precautionary approach could be taken to avoid the establishment of many serious diseases of domestic livestock in Dall's sheep and mountain goats. The potential negative consequences of contact with other domestic animals are greater in Alaska than in



many regions because the state's wild sheep and goats are free of, and believed to have very low immunity to, many domestic livestock diseases. Furthermore, any diseases that are introduced could be spread rapidly throughout the large contiguous ranges that occur here.

One of our primary concerns is the rise in use of goats as pack animals in alpine habitats in the lower 48 states, and the potential for such use in Alaska. In order to raise awareness about disease transmission potential and better understand the risks involved, and to ensure separation between domestic livestock and wild sheep and goats we recommend the following:

Domestic sheep and goats should be discouraged or prohibited within Dall's sheep and mountain goat habitat in Alaska because of recognized risks and potentially substantial negative consequences of disease transmission. Actions should include:

- *The Alaska Board of Game and Federal Subsistence Board should prohibit the use of domestic sheep or goats as pack stock for hunting in Dall's sheep and mountain goat habitats;*
- *The transport, use, or pasturing of domestic sheep and goats should be prohibited on state and federally managed public lands within or near occupied Dall's sheep and mountain goat habitats;*
- *Private landowners should be advised of the potential adverse consequences and encouraged to refrain from the use or pasturing of domestic sheep and goats on lands adjacent to or within Dall's sheep and mountain goat habitats.*

These recommendations follow the Western Association of Fish and Wildlife Agencies (Recommendations for Domestic Sheep and Goat Management in Wild Sheep Habitat, Wild Sheep Working Group, June 21, 2007): "It is widely recognized (Garde et al. 2005), but needs to be re-emphasized, that thinhorn sheep (Dall's sheep, Stone sheep) in northwestern Canada and Alaska are immunologically naïve compared to wild sheep occurring in southern Canada and the remainder of the western U.S. Additional precautions should be taken to ensure that absolutely no contact occurs between naïve thinhorn sheep and domestic sheep and goats."

There is significant risk of disease transmission from other domestic animals such as llamas and alpacas, and prohibiting those animals from Dall's sheep and mountain goat habitats may be warranted to reduce potentially high disease risk. The risk from llamas is considered lower than from domestic sheep or goats, but is much less studied. Helen Schwantje and Craig Stephen, in their report (2003) titled *Communicable Disease Risks to Wildlife From Camelids in British Columbia* concluded that "There is sufficient basis for concern to advise a precautionary approach to managing disease risks. . . . On a province-wide basis, the risk is low, but for specific vulnerable wildlife, the risk can be high." An example of "vulnerable wildlife" they provided was "a population of thinhorn sheep never before



exposed to domestic species." Choosing to include llamas and similar species in Proposal 102 is justified as a precautionary measure. Horses pose little risk of disease transmission to Dall's sheep and mountain goats.

In recognition of the risk posed by goats used as pack animals, several land managers have closed areas to such use (e.g., National Forests in Wyoming and California) and, in other areas, wild sheep conservation organizations have provided financial incentives to discontinue commercial pack goat outfitting in bighorn sheep habitat.

The Alaska Chapter of TWS recommends that the Alaska Department of Fish and Game take a lead role in coordinating interagency efforts to maintain the health of wild sheep and goat populations. Taking action on use of domestic pack animals for Dall's sheep and mountain goat hunting will not, by itself, assure the health of wild sheep and goats in Alaska, but it may be an effective first step. We hope that Proposal 102 will be an important step in initiating similar actions by land management agencies and private landowners concerning non-hunting use of these pack animals in wild sheep and goat habitat. This action would also raise public awareness and clearly indicate to the public that the Department takes this risk seriously.

Thank you for this opportunity to provide input on this very important wildlife management issue.

Sincerely,



Kris Hundertmark, PhD
President



Cliff Judkins, Chairman, and all Members
Alaska Board of Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

December 29, 2011

Dear Chairman Judkins and Members of the Alaska Board of Game.
Thank you for the opportunity to comment on the 2012 Game proposals.

I am a past President of the Alaska Falconers Association.
As stated in the Alaska Falconers Association's (AFA) proposal #38, we are a very small group of very dedicated Falconers, who hold Alaska's Raptors in the highest regard.
With that said, you can be assured there is nothing in our proposal that would be harmful to the populations of Alaska's Raptors or the quarry they hunt.

As noted by the Department, the AFA and the USF&W Service, the impact on Raptors used for Falconry and the quarry they hunt, is so inconsequential, it is not measurable. I urge you to consider and adopt the AFA's proposal #38. It has been well thought out and again, you can be sure it has Alaska's Raptors best interest in mind.

Sincerely,



Richard Holmstrom
PO Box 670386
Chugiak, Alaska 99567



Alaska Board of Game

Mr. Cliff Judkins, Chairman

Mr. Judkins and fellow Board members;

My name is David Lorring and I live in Fairbanks Alaska. I am an active licensed falconer and member of the Alaska Falconers Association. I am requesting that the Board of Game review the proposals in front of them concerning the Alaska Falconry Manual and pass a version that is acceptable to the Board, ADFG and the licensed Alaska Falconers. The passage of this manual and the regulations contained within is necessary to keep the practice of hunting wild game with falcons legal in Alaska.

Proposal number 38 as presented by the Alaska Falconers Association represents many months of discussion and work by the falconers within Alaska. This proposal is supported by association members and its content has been approved by the USFWS. The manual content meets the Services' minimum requirements to proceed into regulation as established by the recent federal mandate.

Proposal #39 is the Departments proposal to update the Falconry Manual. There are several points of disagreement between the two documents. The Board will find it very easy to approve the majority of the manual contents with the support of both the Association and the Department. I believe that a small amount of work conducted in a working group or committee will bring together a consensus on most of the areas of disagreement. There by allowing the board to move forward with making only a few biological based decisions.

In my mind the major points of disagreement between the two groups are

- 1) The continued use of the Annual Report which is required by the department. This report is currently required by regulation and is a document that details the activity of the licensed falconer over the past calendar year. This report requires the listing of the number and species of raptors that the falconer has on hand at the end of the reporting period, the number of new birds captured, birds released, transferred, lost, or



those which have died. This document is felt by some to be a duplication of effort since each of the above mentioned activities is required to be reported on a federal form when the activity takes place with a copy to ADFG. The department feels that the annual report is a summary of all activity by each licensed falconer listed in one place. I personally have no preference as to which way this issue goes.

- 2) The second point of disagreement is the Departments requirement to purchase a hunting license at the beginning of the calendar year to make the falconry license valid. The Association's desire is to require a hunting license and appropriate stamps be in the falconers possession while in the field hunting game with raptors. I personally have no preference as to which way this issue goes.
- 3) The third point of disagreement is the birds that are on the species list for take by falconers. The association requests that all species of raptors that naturally occur in Alaska including sub-species of those raptors be allowed for falconry use. The department is requesting that several species of raptors not be included on the list of available falconry birds. I feel that falconry is the sport of hunting game by using trained raptors. Several species of native Alaskan raptors just do not lend themselves to the hunting of game. In my mind, hunting game with small owls and other species such as ospreys is not practical. I also do not support using species of non Alaska native birds for falconry in Alaska. Alaska native species of raptors are more than adequate to hunt any game animal that occurs in Alaska or in the remainder of the US.
- 4) The fourth point of disagreement is the department's requirement for surgical sterilization of non native species of raptors that are permitted for use of by Alaska falconers and could successfully breed with native raptors. This issue boils down to the use of European Goshawks for falconry in Alaska and the potential of loss and genetic contamination of the native Northern Goshawk population. Even though the loss of a falconry bird with the use of telemetry is not common, it does happen and the departments concern of genetic contamination of a native species is a valid issue. I am a firm believer of the concept behind the clean list and of reasons for keeping



non native breeding species away from our native populations. With this in mind, I support the department's position in maintaining a sterilization requirement for species of concern.

I request that the board not adopt the proposal requesting nonresident take of raptors from Alaska. This is a complicated issue that requires a thorough and exhaustive review of the process. Review of the process must include a thorough discussion on the use of the birds after take for purposes other than falconry (propagation for sale of first generation offspring); land owner permission, competition for take with resident falconers, law enforcement issues such as how to monitor take and how to prevent permit holders from declaring one bird and taking several out of state at the same time. Preventing the take of eyass birds by setting take dates during a period after eyass birds have left the nest.

This proposal has been submitted by an out of state group without consulting the Alaska Falconers Association. We as an association felt that our group should have input on how a nonresident take would take place. Our main goal and efforts went into producing a falconry manual with regulations that meet the federal guidelines and one that has been submitted to and approved by the US Fish and Wildlife Service. This process was a very comprehensive and time consuming effort by the association. We decided that the nonresident take issue will also require a comprehensive and time consuming effort by the association to vet all the potential issues that may arise from this type of controversial regulation. The association requests that the Board allow it to fully review all the issues of a nonresident take and present ideas to the board during the next regularly scheduled cycle that will address falconry issues. I can be contacted by Board members for questions or explanations at:

Mr. David Lorring
3530 Holden Road
Fairbanks, Ak. 99709
Cell, 907-687-4858
Work @ Wright Air Service, 800-478-0502



BOARD OF GAME
STATE OF ALASKA

December 30, 2011

Fax 907 465-6094

RE: KENAI PENINSULA'S GAME MANAGEMENT UNITS 15A AND 15C

I am soundly against the proposed intensive management plan for aerial wolf control on the Kenai Peninsula. Wolf control itself favors very few Alaskans and is expensive to pursue.

Nevertheless, this is not the only voice against the pursuit of killing wolves and I doubt the Board of Game members will be moved by my protest nor the protest of many Alaskans.

HOWEVER, CONSIDER THE RABBITS!

WE HAVE AN EXPLOSION OF RABBITS ON THE PENINSULA. WE NEED THE WOLVES TO PERFORM THE NATURAL SYSTEM OF PREDATOR CONTROL.

RABBITS ARE EVERYWHERE. DON'T KILL THE WOLVES. LET THE WOLVES DEAL WITH THE RABBITS.

THIS IS THE NATURAL LEAST EXPENSIVE PURSUIT FOR GAME CONTROL.

Please think about it. Consider it.

Thank you,
Karen Cauble
63540 Skyline Drive
Homer, Alaska

Karen Cauble



December 29, 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 Statewide, Cycle B Schedule proposals being considered by the Alaska Board of Game (BOG) at the meeting on January 13-17, 2012; in Anchorage. There are a number of proposals before the BOG that affect or have the potential to affect NPS areas in the state. Our comments are organized by the proposal index of topics listed for this statewide regulations meeting. 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 on proposals follow:

Sale of Big Game, Big Game Trophies: Proposals #44, 46 – 48

Proposals 46-48 request changes to 5 AAC 92.200. Purchase and sale of game. Proposal 44 requests that Governor's tags cover periods of time when hunting seasons are not open. State regulations classify black bear, brown/grizzly bear, bison, caribou, Dall sheep, Sitka black-tailed deer, elk, mountain goat, moose, muskox, wolf and wolverine as big game animals. The development of a cash economy associated with the sale of big game has often been shown to be detrimental to the species involved. The commercial sale of big game animals provide economic incentives that may lead to the wanton waste. Should the Board adopt regulations that expand the sale of big game, NPS lands need to be excluded. NPS regulations prohibit the sale or commercial use of animal products taken from NPS areas (other than trapping).

Statewide Big Game Seasons: Proposals #72-76, 78- 86

These proposed regulatory changes would establish earlier big game and sheep seasons for resident hunters and youth, compared to non-residents' seasons. This creates likelihood of state and federal seasons becoming out of alignment in most regions. Seasons and bag limit proposals are usually the primary focus of regional meetings and not statewide regulation meetings. In order to properly evaluate the impacts of these proposals on specific hunts, they should be considered at the appropriate regional



meetings for discussion and analysis. Depending on the area and hunt, changing seasons could interfere with long established state and federal subsistence priorities. Regional meetings would also allow for better public notice and provide the opportunity for the Board to hear from a broader range of users and managers within the affected region.

Statewide Trapping: Proposal #93

This proposal would allow only the use of traps and snares for wolf & wolverine on NPS lands and prohibit the use of firearms except for dispatching trapped animals. The use of firearms under the authorization of a trapping license is generally not allowed on NPS lands, except as is necessary to remove an animal from a trap, or for reasons otherwise related to human safety. 'Hunting' under the authority of a trapping license could lead to increased take and potentially raise conservation concerns. The NPS generally supports this proposal.

Statewide Other Game Seasons: Proposal # 94

This proposal would prohibit the taking of wolf, fox, wolverine, or coyote during May, June, and July on NPS lands. Trapping or hunting seasons that extend into the late spring and summer months, when pelts have little economic value, are generally attempts to reduce predator populations. This is also a time when the raising of vulnerable offspring occurs and the newly born are dependent upon adults for their survival. Also, the taking of furbearers when pelts are not prime may reduce the future opportunity for those who desire to harvest prime pelts. Intensive management or abundance-based management practices, which manipulate predator populations in an attempt to increase other wildlife populations, are not consistent with NPS statutes and policy. The NPS supports this proposal.

Methods and Means: Proposals # 97-98, 100

These proposed regulatory changes address the use of artificial light and other electronic devices in the taking of game. Hunting practices that involve the use of artificial light have been prohibited since statehood, with limited exceptions. Consistent with sound wildlife management and conservation, methods of take that disturb animals when they are in a vulnerable state, should be avoided. Vulnerable periods include denning, reproducing, early stages in a species maturation or when an animal is injured. For example, the use of artificial light in the taking of denning black bear sows and cubs, or other wildlife, have the potential to impact the natural integrity of a native species. Increased efficiency in taking predator species has the potential to create pressures on the natural abundance, behavior, distribution, and ecological integrity of native wildlife. State laws or actions that seek to manipulate natural wildlife populations for human consumption, or have that practical effect, are inconsistent with NPS statutes and policies. If the Board chooses to allow or expand the use of lights, lasers or other electronic equipment, NPS lands need to be excluded.

Methods and Means: Proposals #99, 101 & 114

These proposed regulatory changes would affect same day airborne hunter activities. NPS regulations prohibit same day airborne hunting in NPS areas. Should the Board



adopt any proposals that allow same day airborne hunting, NPS lands must be excluded from these activities. (Title 36 Code of Federal Regulations, 13.40 (d) (4)).

Bag Limits: Proposals #107-109

Proposal #107 & 109 would elevate bag limits for black bear. The proposed regulatory change has the potential to create a conservation concern especially in many areas where black bear populations have not been studied. Also, consistent with past letters to the Board, we ask that NPS lands be excluded from any regulations affecting black bears where the intent is to reduce the subject population for the benefit of other species. Should the Board adopt these proposals, NPS lands need to be excluded from these regulations.

Proposal #108 would prohibit the harvest of cubs and sows accompanied by cubs on NPS lands. Allowing the take of bear cubs and sows with cubs creates the potential to deplete bear populations in NPS areas and on adjacent lands. Regulations that allow the taking of sows with cubs are often associated with intensive management strategies which attempt to reduce bear populations to benefit other species. NPS areas must be excluded from these population reduction activities.

Continuation of the natural process is expected in park areas except as specifically authorized by Congress. The taking of black bear sows and cubs sanction practices that have the potential to impact the natural integrity of a native species. The practical effect of these allowances, is increased efficiency for taking predator species and has potential to create pressures on the natural abundance, behavior, distribution, and ecological integrity of these native wildlife species. The written finding of the Board of Game (2006-164-BOG, General Bear Management) is to protect sows and cubs from harvest, "unless it is necessary to consider methods to increase bear harvests as a part of a bear predator control program." State laws or actions that seek to manipulate natural wildlife populations for human consumption, or have that practical effect, are inconsistent with NPS statutes and policies and exceed Congress's authorization in ANILCA.

Evidence of Sex, Transfer & Possession: Proposals #110 – 112

Proposals #110 – 112 request changes to 5 AAC 92.150. Evidence of sex and identity. The requirement for hunters to report evidence of sex provides state and federal wildlife managers with needed harvest information to support management decisions affecting wildlife populations.

Black Bear Baiting: Proposals #114–119& 121-123

Proposals #114-119 & 121-123 request changes to 5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures. The NPS is concerned about the expansion of bear baiting. The NPS has a long history of trying to prevent habituation of bears to food rewards both to protect bears and for visitor safety. The NPS also has concerns about bait stations attracting non-targeted species as well as site restoration/cleanup when the hunt is completed. Should the Board adopt regulations allowing the expansion of baiting or the use of sent lures, NPS lands need to be excluded.



Trapping: Proposals #124-128

Proposals #124-125 request changes to 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions. These statewide proposals would require trap identification and set time limits for trap checks on National Park Service lands. ADFG has used these management options in certain areas around the state where trapping occurs near roads, trails and other public access points, and where conflicts with other users groups have occurred. The NPS supports these proposals.

Proposal #126-127 propose to prohibit the trapping of black bears. The use of traps and snares to take black bear is only allowed under intensive management plans adopted by the Board of Game, and is currently not allowed in any NPS areas. The NPS in past letters to the Board has consistently asked that black bears not be classified as furbearers and that NPS lands be excluded from any regulations allowing black bears to be snared or trapped. For many years, general wildlife conservation practices prohibited this method of taking black bears. This method can result in the taking of other non-targeted wildlife species. In addition to conservation concerns, bear trapping can lead to visitor safety issues where there is the potential for high use of an area by non hunters. Also, where the intent of regulations are to reduce black bear populations for the benefit of other species, these regulations are inconsistent with NPS statutes and policies and exceed Congress's authorization in ANILCA. Should the Board adopt any proposal that allows or expands the trapping of black bear, NPS lands need to remain excluded.

Intensive Management: Proposals #129-131

Proposals #129-131 request changes to 5 AAC 92.125. Intensive Management Plans. As previously stated intensive management practices including predator control activities are not allowed on NPS lands. Native predator populations may not be manipulated, controlled or eradicated for the purpose of increasing harvestable species on NPS lands. Should the Board authorize any predator control programs in Game Management Units that contain NPS lands, these lands need to be excluded from the plans.

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,



Associate Regional Director
Natural, Cultural and Subsistence Resources

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 NPres/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



Untitled

Frederick D. Overly
8490 Pioneer Drive
Anchorage, AK
99504-4254

December 30, 2011

Alaska Board of Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
Fax: (907) 465-6094

Dear Members of the Board of Game:

I am writing to you in support Alaska Falconers Association Proposal 38 because it is in line with the Federal Government's Regulation. As a Falconer I can say that I and others believe this will make it easier for you to oversee and assist in enforcement from AKF&G and USFWS.

As a new Falconer I can only give you my experience as a person responsible for Raptors in my care. When I am asked to give presentation to children by both agency, I inform them that they are wild birds and never will be pets and I don't own them, they belong to all of us and I have been given privileged of taking care of them. I tell them that this an ancient sport pass down for centuries and it takes someone dedicated to raptors well-being to enjoy the full experience of hunting with such an animal. They are amazed that the raptor is willing to hunt with me and always ask if the hawk brings the prey back to me and I inform them that no, the prey is theirs and to steal from your hawk brakes the trust the raptor has for you. The children then wonder how than do I get to use any of the game for me. I tell them this is part of training process that the hawk like them, love to have an easy meal, so I show the hawk a piece of meat off to the side and cover up the game they just taken; "out of sight, out of mind". To see the kids understand what Falconry is all about is part of thrill of the sport.

Another example of what I have done is assisting Elmendorf AFB removing raptors that have become hazards to aircraft and removing feral rabbits from Anchorage Municipality property that is destroying plants and trees in their landscape around city buildings.

I have also assisted Bird Treatment and Learning Center with their hawks that have been injured and need rehabitation to be return to the wild. The knowledge that have learn through Falconry makes the transistion much easier on the raptor.

So you see there is more to the tradition of Falconry, then just taking raptors for our sport and accepting AFA Proposal in it's entirty will continue the enjoyment and wonder of this sport for next generation.

Very Respectfully,

Frederick D. Overly

Page 1



BOARD OF GAME COMMITTEE
AK DEPT OF FISHERY GAME
FAX 907-465-6094

As a 43 year resident of
the state of Alaska who has
raised a family relying on
game meat. I support all
of the following proposals
66 thru 68, 70 thru 76 and 78
thru 90. I think it is time
the board realizes that
alaskas fish and game is
1st and foremost for the
alaska residents and
their families.

I also support proposal
223 because of the overall
negative impact an antlerless
hunt would have on the Sable
Moose

LEONARD JAWKES
1891 Blackburn Way
NORTH POLE, ALASKA



Wasilla, Alaska 99623

December 30, 2011

Alaska Board of Game
Board Supports Section
PO Box 115526
Juneau, Alaska 99811

VIA FAX: 907-465-6094

RE: Falconry Regulations

Post-it® Fax Note	7671	Date	12/30/11	# of pages	01
To	ALASKA	From	ROBERT		
Co./Dept.	BOARD OF GAME	Co.	COLLINS		
Phone #		Phone #			
Fax #	907-465-6094	Fax #			

Dear Board Members:

Thank you for the opportunity to comment on the proposed changes to the Alaska falconry regulations. I am a retired Assistant District Attorney from the State of Alaska Department of Law. I have been a prosecutor for over 34 years. During my career I prosecuted a number of fish and game cases, in addition to other crimes. I have received awards from conservation law enforcement for my work. I have spoken to numerous agencies, including but not limited to, the USFWS, US Forest Service, ADF&G, zoos, schools, public gatherings, wildlife groups and sportsmen's shows regarding the value of birds of prey and their need for habitat protection. I have been an active falconer for 50 years. Currently, I am assisting the Peregrine Fund's World Center for Birds of Prey on a variety of raptor conservation and education issues. In short, I have devoted much of my professional and personal life to conservation issues.

In brief, please adopt proposal #38 submitted by the Alaska Falconers Association. Falconry is more than an art and sport. It is a lifestyle. This proposal was drafted with the best interests of Alaska's raptor resource in mind. I will leave the detailed positions to those making presentations on behalf of AFA. I have known most of these people for decades. I have complete confidence in their intellectual honesty and commitment to Alaska and its resources.

Sincerely,



Robert Collins



George Matz
PO Box 15182
Fritz Creek, AK 99603
geomatz@alaska.net

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

December 30, 2011

Re: Proposal 36.

Dear BOG Members:

As you well know, the purpose of Proposal 36 is to establish a Predation Control Area in Unit 15C with the goal of reducing calf mortality in order to reverse the long-term decline of the bull:cow ratio. While I don't think many, if any, disagree with that goal, many have questioned the need for establishing a wolf control program, pointing out its questionable effectiveness and the lack of commitment by ADF&G/BOG to pursue other strategies that appear to be more suitable when one considers overall conditions, particularly area habitat and its current carrying capacity. The BOG appears to be in an ideological rut. It's insistence on wolf control for Unit 15C is seen by many as an answer looking for a problem.

I also don't think that Proposal 36 demonstrates an objective assessment of either the problem or potential solutions. I have yet to see an ADF&G science-based assessment of winter carrying capacity for Unit 15C and there has been virtually no acknowledgment of habitat damage caused by a recent moth infestation. In fact, my testimony on Proposal 35 and 36 to the BOG for its November meeting in Barrow emphasized this and included an article entitled *Moose browse is more complicated than it seems* that was published last summer in local papers. The article states, "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."

But rather than repeat my previous testimony, I would instead like to present some new information that is very relevant to reducing calf mortality for not only Unit 15C but all of Southcentral Alaska; namely moose-vehicle collisions. In fact, an assessment of moose-vehicle collisions is required by the Intensive Management implementation plan.

ADF&G's Feasibility Assessment for Maintaining or Increasing Sustainable Harvest of Moose in Game Management Unit 15C (December 2011) does provide an assessment. It says:

How extensive is vehicle mortality along road and rail system that reduces harvestable surplus in the population (estimated number killed annually or as a percentage of total kill by humans that includes harvest and DLP)? Over the past decade, 63 moose/year are documented as dying



due to vehicle collisions in Unit 15C. Based on a past study on age and gender structure of roadkill moose, roughly 41% of the kills are from cows, 51% are calves, and 8% are bulls. Over the past decade, approximately 21% of the total human caused mortality of moose in Unit 15C comes from roadkills.

Anticipated increase in vehicle mortality with ungulate population growth (poses a public safety risk) (Low, Moderate, High). Moderate. We do believe there will be an increase risk of vehicle collisions if the moose population increases. However, this could be somewhat ameliorated by focusing new hunts along road corridors and reallocating harvest from wolves, or mortality from vehicle collisions.

The table below provides a more complete picture for the entire Kenai Peninsula.

	Number of Confirmed Moose Kills				Total
	7	15A	15B	15C	
2000/01	24	59	30	58	171
2001/02	12	100	42	87	241
2002/03	16	73	33	78	200
2003/04	24	134	87	105	330
2004/05	30	83	81	74	248
2005/06	30	45	51	86	212
2006/07	25	66	68	79	216
2007/08	19	78	41	52	190
2008/09	23	101	41	40	205
2009/10	18	45	61	51	175
2010/11	15	137	65	46	263

While the implementation plan for Proposal 36 does recognize the risk of moose-vehicle collisions, and does provide a quantitative assessment of that risk, it doesn't actually discuss solutions or if reducing moose-vehicle collisions might be a viable or more effective alternative than wolf control with respect to reducing calf mortality. Although the implementation does say, "Providing for increased harvest along the highway may also be a means of reallocating moose killed in vehicle collisions to harvest" this doesn't equate to a strategy for increasing calf survival and recruitment.

My interest in looking into what has been done to reduce moose-vehicle collisions in the Unit 15C area was piqued by a recent public notice:

Notice Of Comment Solicitation For A Proposed Highway Safety Improvement Project On The Sterling Highway

The Alaska Department of Transportation and Public Facilities (DOT&PF), in cooperation with the Federal Highway Administration is soliciting comments and information on a proposed Highway Safety Improvement Project (HSIP) to construct approximately 14 slow vehicle turnout (SVT) lanes on the Sterling Highway between Soldotna [near milepost (MP) 106] and Homer (near MP 169). The purpose of the proposed project is to help mitigate the number of head on and rear end crashes that occur along the Sterling Highway.



The proposed work would include the following:

- Construct fourteen 600-foot (ft) long, 12-ft wide SVT's with an 8-ft shoulder at ten locations along Sterling Highway.
- Relocate overhead utility poles if necessary at MP 123, 131.4, 133, 147, 150, and 151 to accommodate SVT's;
- Clear an area approximately 1000 ft long and 50 feet wide for each SVT; and
- Install signs and re-stripe as needed.

All proposed work would take place within DOT&PF right-of-way.

This safety improvement project seemed to be the perfect opportunity to reduce moose-vehicle collisions, which would not only spare some motorists a lot of cost and grief (if not their lives) but improve calf survival and eventually hunting opportunity. However, in talking to the DOT&PF project manager, I learned that there hasn't been any involvement by ADF&G in this project. I think this clearly demonstrates that ADF&G/BOG has not undertaken a comprehensive analysis of the Unit 15C bull:cow issue despite plenty of opportunity to look into strategies other than wolf control.

In looking further into this I came across some interesting data (see attachment) on moose related accidents that indicate to me that conditions at the time of an accident are well documented. Given this database, it seems that a collaborative effort by ADF&G (who knows moose habits) and ADOT&PF (who knows motorists habits) could benefit both moose and motorists and might even accomplish what is intended by wolf control; that is improving calf recruitment. Accordingly, I encourage the BOG to ask for an analysis of this option before deciding on Proposal 36.

According to the Department of Law (File No.: AN20091 03937) the Administrative Procedure Act requires the Board to "pay special attention to the cost to private persons of the proposed regulatory action." This requires that costs to private persons be one of the factors explicitly discussed during deliberations. Any reasonably significant costs to private persons should be acknowledged and discussed, including indirect costs. It seems to me that if the BOG is going to comply with the Administrative Procedure Act it will need to explicitly compare alternatives to wolf control, most notably, reducing moose-vehicle collisions as an option for increasing calf survival and thereby the bull:cow. Savings to moose and motorists could be substantial.

Sincerely,



George Matz



Attachment

DEPARTMENT OF TRANSPORTATION & PUBLIC FACILITIES
Alaska Traffic Crashes: Crash Data
2008

2008 Alaska Moose Related Traffic Crashes
Borough Location and Injury Severity
BOROUGH LOCATION INJURY SEVERITY

	Property Damage Only	Minor Injury	Major Injury	TOTAL
Greater Anchorage	88	16	-	104
Fairbanks North Star	81	11	-	92
Kenai Peninsula	129	17	1	147
Matanuska-Susitna	170	18	1	189
Haines	3	-	-	3
Denali	3	-	1	4
Unorganized	48	7	-	55
STATEWIDE	522	69	3	594

2008 Alaska Moose Related Traffic Crashes
Borough Location and Ambient Light
BOROUGH AMBIENT LIGHT

	Daylight	Twilight or dawn	Streetlight	Dark	Unknown	TOTAL
Greater Anchorage	29	5	29	40	1	104
Fairbanks North Star	18	4	6	61	3	92
Kenai Peninsula	7	7	4	125	4	147
Matanuska-Susitna	22	8	8	147	4	189
Haines	-	-	-	3	-	3
Denali	1	-	-	3	-	4
Unorganized	13	5	-	37	-	55
STATEWIDE	90	29	47	416	12	594



From: tmbrown3 <tmbrown3@aol.com>
To: TMBrown3 <TMBrown3@aol.com>
Subject: Proposal Comments to Board of Game
Date: Thu, Dec 29, 2011 5:54 pm

December 29, 2011

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

Members of the Board of Game: Comments on Proposals for Anchorage Meeting

Below you will find my comments on proposals 35, 36, and 43. I appreciate the opportunity to comment and I thank you for your service on the Board of Game.

Proposal 35: I OPPOSE this proposal and urge the BoG to reject it.

This proposal calls for approval of an intensive management plan for moose in Unit 15A.

While there are only approximately half as many moose in this unit as there were about twenty years ago, a primary reason is the change of habitat to a more mature forest; browse is, therefore, not as readily available to moose. Obviously, then, the population goals for moose in GMU 15A should be adjusted. Effective and responsible wildlife management takes the ecosystem into account, including habitat and correct population goals; this proposal disregards the ecosystem and should be rejected.

In addition to ecosystem factors, there are land management patterns to be considered. Much of GMU 15A is in the Kenai National Wildlife Refuge where aerial wolf control is not permitted. Additionally, much of the remaining land is not suitable for aerial shooting because of the thickly forested terrain. Aerial shooting in the small available area would be too limited to be effective.

There is also a public safety concern. GMU 15A is used by numerous residents and non-residents for various recreational purposes. Aerial shooting, particularly given the terrain, would be a public safety hazard.

This proposal states that those likely to suffer from its acceptance are "individuals who do not approve of intensive management of wildlife populations." Yet it is clear that this proposal, if supported, would be ineffective as well as a poor use of the state's resources; as a result, every Alaskan - and many non-residents - would suffer.

Proposal 36: I OPPOSE this proposal and urge the BoG to reject it.

This proposal calls for approval of an intensive management plan for moose in Unit 15C.

<http://mail.aol.com/35138-111/aol-6/en-us/mail/PrintMessage.aspx>



The current low bull to cow ratio in this game management unit is the result of a poor harvest strategy rather than from wolf predation. The new harvest plan must be given adequate time to take effect.

Additionally, it is questionable whether or not the moose population is in danger in the first place. In fact, the moose population increased by 40% between 1992 and 2010, and there is no reason to believe that this growth will not continue.

Land management patterns must also be considered. Much of GMU 15C lies within the Kenai National Wildlife Refuge where aerial wolf control is not permitted. Also, much of the remaining land is not suitable for aerial shooting because of the thickly forested terrain.

This proposal states that those likely to suffer from its acceptance are "individuals who do not approve of intensive management of wildlife populations." Yet it is clear that this proposal, if accepted, would be ineffective as well as a poor use of the state's resources; as a result, every Alaskan - and many non-residents - would suffer.

Proposal 43: I SUPPORT this proposal and urge the BoG to accept it.

This proposal calls for the review and modification of nuisance beaver permits to allow the use of beaver flow devices.

The first part of this proposal calls for an update of our state's beaver management policies. Our current beaver regulation was last updated in 1989, and is based upon outdated information. Since then, scientific research has proven the value of beavers to healthy ecosystems. It is high time that our state be updated to reflect current knowledge of beavers and their benefits to habitat.

The second part of this proposal calls for those trapping outside of the season to consider the use of beaver flow devices. Accepting this part of the proposal provides user groups with another option while taking away no options.

Thank you again for the opportunity to comment, and thank you again for your service.

Sincerely,
Tina M. Brown

19400 Beardsley Way
Juneau, AK 99801

523-5402 (H)
209-4219 (C)



December 29, 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, 36 and 127. I am writing to ask you SUPPORT proposal 127 and as a resident of the Kenai Peninsula asking you to OPPOSE Proposals 35 and 36.

Proposal 127 – Approve for the following reasons:

1. Bucket snares and bait are allowed within ¼ mile of public roads, trails and the Alaska Railroad, with no public notice required, creates a public safety hazard and should not be allowed.
2. There is no requirement to salvage the meat of the black bear even though it is widely considered a very high quality food source. This should be considered illegal "wanton waste" and not be allowed.
3. Snaring and trapping is indiscriminate and certainly will snare brown bears and brown bear cubs.
4. Bears are an iconic species and the "Fair Chase" ethic that many Alaskans abide by is affronted by the snaring of bears.
5. The changing of the classification of bears to "furbearers" was inappropriate and needs to be changed back to the way it was



Page 2 – Oppose Proposal 35 and 36 comments:

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 implementation of this plan would be nothing more than a welfare subsidy program for a special interest group of commercial hunting organizations, and does not benefit the majority of Alaskans.
3. This implementation of intensive management is not "socially sustainable" just by looking at the number of Alaskans who wrote comments in opposing the plan at the recent Barrow, Alaska BOG meeting.

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) voted "9 to 1" AGAINST this proposal.
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. 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.
5. This implementation of intensive management is not "socially sustainable" just by looking at the number of Alaskans who wrote comments in opposing the plan at the recent Barrow, Alaska BOG meeting.

Thank you for your consideration of my comments.

Sincerely,

Dave Bachrach
P.O. Box 2828
Homer, Alaska 99603





RESURRECTION BAY CONSERVATION ALLIANCE

Our mission is to enjoy
and advocate for
healthy water,
land and air.

PO Box 1092 Seward, AK 99664
info@rbca-alaska.org

907 224-4621
rbca-alaska.org

December 27, 2011

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

Via fax: 907 465-6094

Re: Proposal 36-Unit 15C

Board of Game:

On behalf of the membership of the Resurrection Bay Conservation Alliance based in Seward, Alaska, we oppose proposal 36-Unit 15C, which would allow for the aerial killing of wolves on the Kenai Peninsula.

We understand that the moose population is healthy and needs no tinkering.

If the goal is to dominate the harvest of moose by humans rather than wolves, you should consider three things: aerial killing of wolves will squander the efforts of tourism industries, including state entities. Aerial wolf killing is blatantly unpopular. Second, the human population has increased so that there will never be enough moose for everyone who wants to kill one. And third, wolves are a critical component of any ecosystem. We do not believe that the Homer area needs special treatment. Being on the road system, there are plenty of alternative, natural and organic food sources like fish and gardening.

I'm sure you are hearing that this idea is ludicrous and not in the best interest of Alaska. Even the Homer Fish and Game Advisory Committee recommended 9-1 that the Board of Game not approve this intensive management.

With respect,

Mark Luttrell, President





RESURRECTION BAY CONSERVATION ALLIANCE

PO Box 1092 Seward, AK 99664
info@rbca-alaska.org

907 224-4621
rbca-alaska.org

Our mission is to enjoy
and advocate for
healthy water,
land and air.

December 27, 2011

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

Re: Proposal 35-Unit 15A

Board of Game:

On behalf of the membership of the Resurrection Bay Conservation Alliance based in Seward, we oppose proposal 35-Unit 15A, which would allow for the aerial killing of wolves on the Kenai Peninsula.

Our understanding is that killing wolves would not increase moose numbers and that habitat for moose is the limiting factor in reproductive viability.

If the goal is to dominate the harvest of moose by humans rather than wolves, you should consider three things: aerial killing of wolves will squander the efforts of tourism industries, including state entities. Aerial wolf killing is blatantly unpopular. Second, the human population has increased so that there will never be enough moose for everyone who wants to kill one. And third, wolves are a critical component of any ecosystem.

For aerial killing of wolves to be justified, it must pass scientific scrutiny. To date, it has not. Predator control shouldn't be conducted until biologists have studied every component of the ecological relationships of prey and predator. Plus other methods of population control need to be completed before proposing something so extreme as aerial wolf killing on the Kenai Peninsula.

I'm sure you are hearing that this idea is ludicrous and not in the best interest of Alaska. Even the Homer Fish and Game Advisory Committee recommended 9-1 that the Board of Game not approve this intensive management.

With respect,

Mark Luttrell, President



Dear Game Board Members,

12/28/11

My name is Don Hunley. I have been an avid hunter for 41 years and an assistant hunting guide in Alaska for the last 12 years, guiding moose, caribou, sheep and brown bear. I have been a resident of Alaska for 28 years. I have practiced falconry for 24 years and have been the Northern Director for the national falconry organization, North American Falconry Association, NAFA. I am currently the Southern Region Vice President for the Alaska Falconers Association.

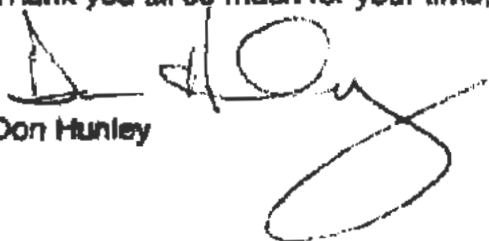
Please support Proposal #40, allowing a limited non resident take of falconry birds. I believe there are no biological reasons for not allowing a limited non resident take. I suspect there are some details in the proposal that could be improved, but would ask you to support the non resident take.

A big reason is personal. Some day, I might actually leave Alaska. I would love the opportunity to come back and go take a goshawk or a falcon with a couple of my buddies that still live up here.

Another reason is to allow non resident falconers the possible opportunities that we Alaskans enjoy on a daily basis. Many sportsmen/women come to Alaska to fulfill lifetime dreams, heck, I am one of them that chose to stay. Alaska allows non residents to take fish and game I suspect, because there is enough to go around and not harm residents. It seems appropriate that Alaska could allow non resident falconers the opportunity of a lifetime to come up here and take a wild falcon from the eyrie, like we residents do on a regular basis. Again, there is no biological reason for not allowing a take, so, why not?

Please support Proposal #40.

Thank you all so much for your time.


Don Hunley

RECEIVED

DEC 30 2011

BOARDS
ANCHORAGE

Att: Scott
BOG SW
Public Comment



TO THE ALASKA BOARD OF GAME

Statewide Regulation Proposals

January 13-17, 2012 Meeting

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.

PROPOSAL 43 – SUPPORT

I support this proposal. It makes sense to consider the use of a beaver flow device to address the perceived problems caused by beavers given the positive effects of the wetlands they create.

PROPOSAL 127 – SUPPORT

I support this proposal. The Board of Game erred in its decision to list black bears as a furbearer in 2010. The trapping of bears had been prohibited since statehood until that time. The use of a trap or snare to take a black bear is indiscriminate; dependent cubs still with the extremely protective sow can be caught as well as non-target species like brown bears. It is also inhumane. A large animal like a bear struggles mightily to free itself from the restraint of a foot restraint.

PROPOSAL 130 – OPPOSE

I oppose this proposal. The stated intent is to remove brown bears that prey on muskoxen. ADF&G's own study indicates muskoxen health in 26B is compromised due to pathogens prevalent in this population and dietary deficiencies (low levels of copper). Removal of some or even all of the bears will not resolve the ill health of the musk oxen herd. It is possible the musk ox have reached carrying capacity for the habitat, a habitat that is changing as the global climate changes.

PROPOSAL 131 – OPPOSE

I oppose this proposal. I do not support adding black and brown bears to the 19A Predator Control Program. With an action as extreme as bear control, Alaska is heading toward eliminating bears from our state.

I have lived in Alaska for 33 years and have seen a steady decline in sound wildlife management policies. Proposals 35, 36, 130, and 131 underscore that decline.



Thank you for your consideration.



Marilyn Houser
2411 Ingra Street
Anchorage, AK 99508

12/30/2011



December 30, 2011

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

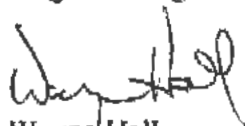
Members of the Board of Game,

Regarding the trapping and snaring of black bears, **I support Proposals 124, 125, 126, 127 and 142.** Indeed, the proposed additional regulations regarding trapping/snaring on lands managed by the National Park Service should be applied statewide. Proposals 127 and 142 to explicitly prohibit the trapping or snaring of black bear are necessary for the reasons stated in the proposals. **I oppose Proposal 131** to add black and brown bears to the ongoing and ill-advised wolf control program in Unit 19C. After having eliminated a majority of the area wolf population for the last seven years with no apparent effect, this ADF&G proposal belatedly says "oops, we blew it, so let's kill bears now." Not indicative of professional management, research or decision-making on the part of BOG/ADF&G to be sure.

I support Proposals 92, 93 and 94 to limit the killing of wolf and wolverine by shooting unless already caught in a trap or snare. This is not a new idea but trapping is still trapping and hunting is still hunting. Wolves and wolverine should not be routinely subject to such double jeopardy. There are plenty of other regulations which allow the shooting of free ranging wolves and wolverines under the hunting regulations. It is just another transparent charade to allow expanded hunting and use of aircraft under trapping regulations.

I oppose Proposals 35 and 36 to implement wolf control in Units 15A and 15C on the Kenai Peninsula. The overwhelming scientific evidence, as presented even by ADF&G, clearly indicates that wolves are not the cause of a perceived limited moose population in Unit 15A and that it is instead clearly caused by limited habitat. And in Unit 15C, moose population goals established by ADF&G/BOG have already been met. To seek to kill wolves under the guise of intensive management in spite of that clearly exposes one thing - that the often repeated claim by BOG and other predator control proponents that these predator control programs are only temporary, or to cure a perceived "predator pit" situation, and will ultimately benefit moose and wolves is, and always has been, a lie. You would be doing exactly what you said you would not do when intensive management was introduced.

Both Proposals 35 and 36 constitute killing wolves by aerial hunting and other means solely because a few obsessive users want to do it, and they currently have the political means to force it on everyone else. Because there is no scientific or ethical basis for it, and because consumptive users already constitute a small minority, both wolf control and the trapping and snaring of bears constitute the kind of egregious game management hypocrisy that will give the small hunting and trapping community in Alaska the kind of public relations black-eye from which it will not recover. Approving more wolf/bear control, and the trapping/snaring of bears, might provide some small, short-term satisfaction to its proponents but the long-term negative impacts on the consumptive community's image and control will be substantial.



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



December 28, 2011

Alaska Board of Game, Boards Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526
(907) 465-4110 (Executive Director)
(907) 465-6094 (Fax)

Dear Alaska Board of Game Members,

My name is Eric Fontaine. I am a Master Falconer and a 48-year Alaska resident living in Anchorage. I was raised in Alaska; attended public schools here, earned an engineering degree from UAA, and now raise my own family here. I have been a lifelong hunter and fisherman. I submit this letter to the Alaska Board of Game (Board) with written comments pertaining to **Proposals 38, 39, and 40.**

1. Please **ADOPT PROPOSAL 38** as submitted by the Alaska Falconers Association;
2. Please **REJECT PROPOSAL 39** as submitted by the Alaska Dept. of Fish and Game;
3. Please **REJECT PROPOSAL 40** as submitted by the American Falconry Conservancy.

1. Proposal 38: This proposal seeks to update the state's existing falconry regulations to bring them into compliance with latest federal regulations established by USF&WS. Coming into compliance with the federal regulations is mandatory in order to keep falconry legal in Alaska. This is the last opportunity the Alaska Falconers Association (AFA) will have to propose to the Board before the sunset date of the federal regulations eliminates falconry in Alaska. Because this is a critical deadline for falconers, we began very early on in discussing and drafting our proposal. AFA has crafted a document of updated falconry regulations that has already been approved USF&WS as compliant with their latest regulations. I respectfully urge the Board to accept Proposal 38 in it's entirety as it is written.

2. Proposal 39: This proposal is ADF&G's version of the updated falconry regulations that is intended to bring the state's regulations into compliance with the latest federal regulations much like Proposal 38. With a long history of regulating falconry in the United States, USF&WS determined that falconry is a heavily regulated field sport that ultimately has a negligible impact on raptor populations or the quarry that is pursued through falconry. Their latest regulations reflect this and in many ways loosen the requirements of falconers in acquisition of raptors, husbandry, reporting, etc. Proposal 39 does not pass along many of these liberties to falconers as it should. As a brief example; USF&WS opened up availability of many raptor species to falconers. ADF&G culled this list down in their proposal to species they determined would be more appropriate with no reasonable justification other than they felt certain species should not be falconry birds.



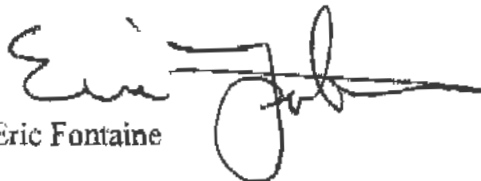
Scientific evidence and biological facts should determine which species of raptors are available for take rather than opinion.

Another problem with Proposal 39 lies in the verbiage content itself. The document contains numerous errors, omissions, discrepancies, etc. This is a grave concern for falconers because of the weight the document may carry before the Board due to it being authored by ADF&G. The problem is if this proposal is adopted by the Board in lieu of Proposal 38, it may ultimately be rejected later by USF&WS for these problems. This could result in a temporary or even permanent loss of falconry in Alaska. Proposal 39 has not been reviewed by USF&WS at the time of this commenting. It is suspected that Proposal 39's poor condition is due to being assembled in a hurried manner for the imminent Board meetings. In fact this document was submitted more than 7 months after the submittal deadline for proposals. I respectfully urge the Board to reject Proposal 39 as there is a better, cleaner, and less onerous proposal (Prop. 38) that has already been accepted as compliant by USF&WS.

3. Proposal 40: Proposal 40 is a bid by the American Falconry Conservancy (AFC) to allow nonresidents to acquire wild raptors from Alaska. AFC is an organization of approximately 100 members who seek to expand benefits to the falconry community generally through changing agency policies, legislation, etc. There are two primary problems with AFC's Proposal 40; 1) It's submittal timing is very poor. Alaska's falconers are currently pursuing a very important milestone in our sport, the adoption of the federal regulations into state law. This is a mandatory exercise that must get accomplished to keep falconry legal in Alaska. Nonresident take of raptors has long been a very contentious issue among falconers. Early in our discussions, falconers in Alaska informally chose to shelve discussions about nonresident take because of the potentially heated discussions that could result and derail our primary goal of coming to agreement on a regulation proposal that would satisfy our group and meet the federal requirements. This was a big enough task that did not need its focus diluted by discussion of an inflammatory and non-mandatory topic such as nonresident take. 2) Regardless of whether falconers in Alaska are or aren't in favor of a nonresident take, many resent that an outside group would submit a proposal to help themselves to Alaska's raptors without the endorsement of the Alaska Falconers Association, particularly, at a time when we have our hands full with more pressing business. I believe it would be appropriate to defer the conversation about nonresident take until the next Board meeting cycle when we have a new set of regulations in place. It is much easier to make decisions when you know what you are working with. Right now our regulations are in flux. For these reasons I respectfully urge the Board to reject Proposal 40 at this time.

Thank you for your time and the opportunity to comment.

Sincerely,


Eric Fontaine



To: Kristy Tibbles
Alaska Fish and Game

December 30, 2011

From: Richard Flanders
1870 Becker Ridge Rd
Fairbanks, AK 99709
907 479-8873

Re: game regulation change proposals, 2012

I like the set of proposals between #78 and #85 that propose opening the resident sheep season earlier than that for non-residents. I've encountered that kind of system in other western states and have always wondered why Alaska didn't do that.

I also like proposals #66 - #69 that propose a bonus points for residents in drawing hunts. I've never in over 30 years, until this fall, applied for a drawing hunt because I know of folks who apply for decades and never get drawn. And limiting non residents to a maximum of 10% of the drawing permits is a sterling idea. If that gets passed and my chances of getting drawn increase I will start applying for hunts every year.

I know that a lot of these kind of proposals will be fought tooth and nail by the hunting guides who have an inordinate amount of sway over game regulations, but these resources are supposed to be managed for the benefit of Alaskans first so let's move toward that goal. It has become over the years much more difficult for Alaska residents to get a moose or other large game to fill the freezer; some of these regs need to change to remediate that problem. Alaskans first.



Richard Flanders



December 30, 2011

Alaska Board of Game
Board Supports Section
PO Box 115526
Juneau, AK 99811

VIA FAX: 907-465-6094

RE: Falconry Regulations

Dear Board Members:

Thank you for this opportunity to comment on the proposed changes to the Alaska falconry regulation. I have been a licensed falconer since 1992 and have been interested in wildlife conservation all my life.

Please give careful consideration to proposal #38. This proposal is the result of a thoughtful review of applicable federal, state and historical Alaska falconry regulation.

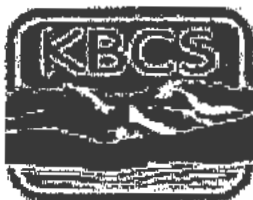
Sincerely,



Colleen Peterson
Wasilla, AK

Post-it* Fax Note	7671	Date	12/30/11	# of pages	2
To	AK Board of Game	From	Colleen Peterson		
Co./Dept.		Co.			
Phone #		Phone #			
Fax #	907-465-6094	Fax #			





**Kachemak Bay
Conservation Society**

3734 Ben Walters Lane, Suite 202
Homer, AK 99603
kbayconservation@gmail.com

OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL

of pages ▶ 3

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

To Board Support	From KBCS
Dept./Agency BOG/ADF&G	Phone # (907) 235-8214
Fax # (907) 465-6094	Fax # (907) 235-4069

NSN 7540-01-317-7388

5099-101

GENERAL SERVICES ADMINISTRATION

RE: Proposals 35 and 36

December 30, 2011

Dear Board of Game Members:

The Kachemak Bay Conservation Society (KBCS) submits the following comments regarding Proposals 35 and 36, scheduled to be considered at the January 13-18, 2012 Board of Game (BOG) meeting in Anchorage.

The public process was hampered earlier by the rushed timing, distant meeting location, and lack of an Operation Plan or Feasibility Assessments before the November 2011 BOG meeting in Barrow where these two proposals were initially scheduled for consideration. We very much appreciate the Board postponing consideration of these proposals until the January 2012 meeting in Anchorage.

Proposal 35 – GMU 15A

KBCS opposes this proposal and asks the Board of Game to reject it. Specific comments are as follow:

Proposal 35 has not had the support of ADF&G wildlife biologists on the Kenai Peninsula.

The proposal includes aerial wolf control, a management action which is not supported by the scientific data and is therefore not biologically warranted. In fact, aerial control would be precluded from the majority of land area in the GMU due to land ownership patterns, most especially the extensive lands under federal management for wildlife conservation across this Unit. Intensive game management is not a compatible use for the US Fish and Wildlife Service Refuge System, of which the Kenai National Wildlife Refuge is a part. Only a small proportion of the Unit lies outside the wildlife refuge, and only a small portion of that remainder is state or borough land where the aerial hunting could take place. Concentrating aerial control onto such a small portion of the Unit area cannot be biologically justified.

More to the point, ADF&G has identified habitat as a limiting factor in moose population growth in Unit 15A, not predation. Poor habitat quality is affecting the nutritional status of cow moose and consequently their calf production. If predator populations are reduced without habitat restoration, nutritional stress on moose would increase and therefore productivity would drop. Additionally, ADF&G moose population objectives are based on a period of time falling a decade or two post-widespread wildfire (in this case, the 1980's and 90's), when the local habitat supported a larger moose population. These numbers are unrealistic under current natural habitat conditions; the woody browse moose need, and a particularly critical food resource in winter, has grown out of reach and not been replenished by subsequent wildfire or other habitat restoration even



Additionally, the wolf population in this Unit is no larger now than when the moose population was burgeoning on that post-fire browse. Instead, moose habitat management while at least temporarily lowering moose population and harvest level objectives is a more ecologically sound approach in Unit 15A at this point.

As a management action, shifting the source of moose mortality from natural predation to human harvest requires calves to survive longer. However, again, that is not a sustainable prospect under current habitat conditions. We question the logic of trying to increase moose survival without improving their habitat.

Further, there is not adequate current data on the local wolf population as there have been no recent surveys conducted. Additionally, the Kenai Peninsula wolf population is relatively isolated from interior populations; therefore it behooves ADF&G to look at genetic diversity within the Kenai Peninsula wolf population before undertaking any aerial control measures to remove large portions of the population.

Lastly, Unit 15A has a relatively large human community living in both dense and widely scattered patterns across the area. It is also heavily visited by recreational users, including those from out of the area. Aerial wolf control would create increased conflict between user groups on the Peninsula and potentially create a risk to human safety, especially due to the forested terrain.

Therefore, KBCS recommends that moose population management in Unit 15A should focus on improving habitat quality rather than on predator control at this point in time.

Proposal 36 – GMU 15C

KBCS opposes this proposal and asks the Board of Game to reject it. Specific comments are as follow:

Proposal 36 has not had the support of ADF&G wildlife biologists on the Kenai Peninsula.

The proposal includes aerial wolf control, a management action which is not supported by the scientific data and is therefore not biologically warranted. As with Unit 15A, similar issues exist of limited opportunity for carrying out aerial control on non-federal or privately-owned land occurring in the proposed area of control (north of Kachemak Bay) within Unit 15C. ADF&G has identified that current moose population demographics in this Unit are the result of insufficient harvest strategy; in response the Board of Game recently implemented new local harvest restrictions. Although these restrictions appear to be having the desired effect, any further action is premature until we allow sufficient time for the new strategy to have fully increased the bull:cow ratio. If the new strategy is successful, the issue is resolved without the need for other measures. Overall productivity remains stable for moose in Unit 15C and the population is within Unit objectives and continues to grow. As the issue is not one of calf mortality but results from the human over-harvest of bulls, there is no demonstrated causative link to wolf predation.

Further, it is incumbent on ADF&G to assess winter carrying capacity of moose in this Unit before undertaking any action that might increase the population to the point of exceeding habitat sustainability. The recent incidence of Geometrid moth infestation in the Kachemak Bay area directly reduces habitat availability for moose and requires serious examination before implementing control measures to increase the moose population locally.

Again, as with Unit 15A, Unit 15C has a relatively large human community living in both dense and widely scattered patterns across the area. It is also heavily visited by recreational users, including those from out of the area. Aerial wolf control would create increased conflict between user groups on the Peninsula and potentially create a risk to human safety, especially due to the forested terrain.



Most importantly, adequate data regarding wolf numbers for Unit 15C are not well known, which argues against the wisdom of aerial hunting of these animals. While in the planning stages, recent and robust local wolf population surveys have not been completed by ADF&G within Unit 15C, making any efforts at aerial control before they have been completed and analyzed quite premature and biologically unsupportable. The fact that the wolf data presented in Proposal 36 for Unit 15C are in fact extrapolated from other areas on the Kenai Peninsula, where the robustness of said data is questioned, brings the whole proposal into serious scientific question.

In Summary

Neither Proposal 35 nor 36 directly addresses current moose population issues in either GMU 15A or 15C and implementing wolf control in either or both of these Units is not supported under current biological conditions. An additional and important factor impinging on moose populations along the road corridor that crosses the length and breadth of the Kenai Peninsula is injury or death from collision with motor vehicles. This growing source of mortality is not adequately addressed in either of these proposals. For instance, approximately half of all moose-vehicle collisions on the lower Peninsula involve moose calves and constitute over 20% of the total moose harvest by humans. One clear solution to increasing calf survival in Unit 15C, as well as reducing the mortality risk to people, is to directly reduce the incidence of moose-vehicle collision across the Peninsula.

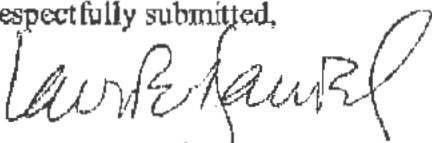
Nor does either proposal take into consideration non-consumptive uses of wildlife on the Kenai Peninsula, including both moose and wolves. Wildlife viewing and ecotourism are significant and growing sectors of the year-round local economy across the Peninsula, as well as across the state, and deserve equal footing in wildlife management decisions under consideration by both ADF&G and the Board of Game.

Lastly, it has been demonstrated by past aerial predator control actions within the state that the biological effects of such actions are far-reaching across ecosystems, with negative repercussions impacting non-target species that include in-stream salmon numbers within local watersheds.

Therefore, KBCS asks the members of the Board of Game to oppose both Proposals 35 and 36 and work instead to shift the overall approach of wildlife management by the State to one that is fully ecosystem-based. It has not been shown that wolves constitute a serious problem for Kenai Peninsula moose populations in either Game Management Unit 15A or 15C, and the proposed program is not scientifically justified. Aerial wolf hunting in these GMUs is unnecessary, not supported by current data, and would likely be ineffective in achieving or sustaining moose population objectives. Further, we seriously question the basis for current moose population and harvest objectives, which rely on a couple of decades of historically high population numbers post-wildlife in the late 80s and early 90s which is sustainable only by a habitat-managed ecosystem.

Again, we ask that you please reject both Proposal 35 for GMU 15A and Proposal 36 for GMU 15C.

Respectfully submitted,



Laurie Daniel, Vice-President
Kachemak Bay Conservation Society



Roberta Highland
 Robert Archibald
 P.O. Box 2460
 Homer, AK 99603
 907-235-8124

RE: Proposal 35-Unit 15A
 Proposal 36-Unit 15C

OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL

of pages 2

To BOARD SUPPORT	From R. Highland
Dept./Agency ADF&G/BOG	Phone # (907) 235-8214
Fax # (907) 465-1094	Fax # (907) 235-4069
N8N 7540-01-317-7968	5099-101 GENERAL SERVICES ADMINISTRATION

Dear BOG,

We strongly oppose Proposal 35-Unit 15A for the follow in reasons:

1. There has not been a study on moose productivity in this unit.
2. Scientific research indicates decreased moose browse due to lack of fire creating and unsustainable environment resulting in starvation. Killing wolves would only add to this problem.
3. The proposed area for wolf killing is smaller than any area where aerial hunting has been allowed which can cause difficulties.
4. The human population has increased so that there will never be enough moose for everyone who wants to kill one and realistically there never will be.
5. In a 9-1 vote, the Homer Fish and Game Advisory Committee recommended that the Board of Game not approve this intensive management.
6. Unit 15A has an abundance of other food source including fish, organic beef, and great gardening climate. Unit 15A is on the road system, which increases the hunting pressure on moose.
7. This area has a large tourism industry with many people traveling thousands of miles to view our wildlife-all wildlife. Their expectation is seeing (nature running wild). This plan will negatively affect our visitor's expectations. Wolves here are worth more alive than dead.
8. Aerial wolf killing is a very controversial practice. Intensive management practices by law must be the last resort, not the first.
9. The ADF&G brochure notes that predator control isn't done until biologists have studied the causes of declining game populations and the impact of predators and tried other methods, such as improving habitat, reducing hunting and easing predator trapping and hunting regulations.
10. ADF&G did receive funding to conduct moose studies in Unit 15A and Unit 15C and plans to do that next March, as well as wolf research. That would be after aerial wolf control starts in January, if approved.

We strongly oppose proposal 36-Unit 15C for the follow in reasons:

1. Unit 15C is in the middle of objective numbers for moose population, indicating there is no emergency need for this intensive management practices.
2. BOG implemented a change to Unit 15C removing spike, fork, and 3 brow tine from harvestable moose population and there has not been time to see the effects of these changes. So an aerial wolf kill program is premature.
3. Biology does not support this intense management program as moose population concerns in 15C are not driven by wolf predation but the result of an insufficient harvest strategy which has been exacerbated by illegal harvest and moose-motor vehicle collision.
4. Unit 15C has an abundance of other food source including fish, organic beef, and great gardening climate. Unit 15C is on the road system, which increases the hunting pressure on moose.



5. The human population has increased so that there will never be enough moose for everyone who wants to kill one and realistically there never will be.
6. In a 9-1 vote, the Horner Fish and Game Advisory Committee recommended that the Board of Game not approve this intensive management.
7. The ADF&G brochure notes that predator control isn't done until biologists have studied the causes of declining game populations and the impact of predators and tried other methods, such as improving habitat, reducing hunting and easing predator trapping and hunting regulations.
8. ADF&G did receive funding to conduct moose studies in Unit 15A and Unit 15C and plans to do that next March, as well as wolf research. That would be after aerial wolf control starts in January, if approved.
9. This area has a large tourism industry with many people traveling thousands of miles to view our wildlife-all wildlife. Their expectation is seeing (nature running wild). This plan will negatively affect our visitor's expectations. Wolves here are worth more alive than dead.

We are strong advocates of a strong ecosystem and biodiversity. Humans have a tendency to want to control nature for our own benefit, which has proven detrimental.

Sincerely,
Roberta Highland
Robert Archibald



Board of Game Comments (1 907 465 6094)

Proposals 66 – 70, 71 – 74 and 78 - 85

Strongly Support 71 – 74

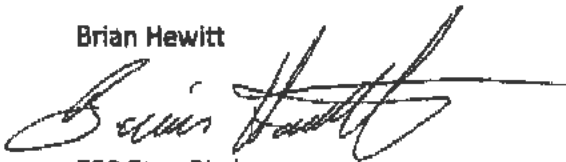
As a 41 year resident of Alaska, I am appalled by the treatment of Alaska residents by fellow Alaskans, Especially the boards of Game and Fish to assure residential preference of game and fish allocations.

I have read the over twenty proposals referring to a preference for Alaska residents. Most propose an early season start date for resident hunters, especially for Dall sheep. I believe it is the responsibility of the Board of Game to defend the residents of Alaska for resource allocations and quality of hunt. A conflict does exist between resident and nonresident hunters, especially those who are guided. Although the guides will say different, nonresidential hunters will continue to apply for and hunt Alaska's game resource even with a residential preference for Alaskans.

I support proposals 66 – 70, 78 – 85 and strongly support proposals 71 – 74

It is time the BOG supports Alaskans

Brian Hewitt



790 Eton Blvd.

Fairbanks, Ak. 99709



Board of Game Comments (1 907 465 6094)

ATTN: Board of Game Comments / Alaska Department of Fish and Game

Proposals 66 – 70, 71 – 74 and 78 - 85

Strongly Support 71 – 74

As a 30 year resident of Alaska, I am appalled by the treatment of Alaska residents by fellow Alaskans, Especially the boards of Game and Fish to assure residential preference of game and fish allocations.

I have read the over twenty proposals referring to a preference for Alaska residents. Most propose an early season start date for resident hunters, especially for Dall sheep. I believe it is the responsibility of the Board of Game to defend the residents of Alaska for resource allocations and quality of hunt. A conflict does exist between resident and nonresident hunters, especially those who are guided. Although the guides will say different, nonresidential hunters will continue to apply for and hunt Alaska's game resource even with a residential preference for Alaskans.

I support proposals 66 – 70, 78 – 85 and strongly support proposals 71 – 74

It is time the BOG supports Alaskans

Marty Laudert

3238 Edby Rd

Fairbanks Alaska 99709



Proposals 66 & 68

Support Both 66 & 68

These proposals are very similar and limit nonresident participation to 10% and insure that Alaskans are guaranteed 90% of the resource. All western states limit the number of nonresidents in their drawing permits and a 10% cap is very common - some states are up to 16-20% and some states have 5%, 3%, 1%, and down to one tag per nonresident.

It appears that Alaska is headed toward assigning more permit areas and this should be in place before this discussion starts. A cap of 10% should be the upper limit of nonresident participation.

**Tom Lamal
1734 Becker Ridge Road
Fairbanks, Alaska 99709**

Tom Lamal



Proposal 67

Support

This proposal is similar to 66 & 68, but it doesn't allow nonresidents to participate if there is a drawing with less than ten permits. Mt. Harper would be a good example where four permits are allowed every year and nonresidents would not be allowed to apply.

These proposals are very similar and limit nonresident participation to 10% and insure that Alaskans are guaranteed 90% of the resource. All western states limit the number of nonresidents in their drawing permits and a 10% cap is very common - some states are up to 16-20% and some states have 5%, 3%, 1%, and down to one tag per nonresident.

It appears that Alaska is headed toward assigning more permit areas and this should be in place before this discussion starts. A cap of 10% should be the upper limit of nonresident participation.

**Tom Lamal
1734 Becker Ridge Road
Fairbanks, Alaska 99709**

Tom Lamal



Proposal 69

Support

I like the idea of preference points for drawing permits. I apply for several hunts in western states and preference points helps keep me involved and improves my chances. These states generate a lot of money for their wildlife programs. A Montana preference point costs a nonresident ten times more than a resident and if you skip more than one year you lose all of your previous points – so once you commit you are likely to keep applying.

Tom Lamal
1734 Becker Ridge Road
Fairbanks, Alaska 99709

Tom Lamal



Proposal 71

SUPPORT

I support opening hunting seasons one week early for residents in intensive management areas. Intensive management is designed for residents to be able to harvest game for human consumption. I don't think IM areas were design for residents to compete with commercial operations and nonresidents to fill their freezers.

Tom Lamal
1734 Becker Ridge Road
Fairbanks, Alaska 99709

Tom Lamal



Proposals 72, 73, & 74

SUPPORT #72, 73, & 74

There are already areas where residents have early start dates so statewide would give residents a chance to harvest their game with less competition.

Tom Lamal
1734 Becker Ridge Road
Fairbanks, Alaska 99709

Tom Lamal



Proposals 75 & 76

SUPPORT 75 & 76

I support youth hunts and I feel it is our obligation to keep kids involved in outdoor activities. The number of kids entering the field as youth hunters is declining every year. I like proposal 76 requirement of an adult forfeiting their hunting tag so their son or daughter can participate in a youth hunt. Proposal 76 also gives the BOG the option to adjust dates for different species. We need to keep our family hunting traditions alive by creating quality experiences for our youth. Animal Rights groups have a goal of stopping hunting and discouraging our kids is a major step in making their agenda successful. Kids need to have a positive experience and have a reasonable chance of enjoying some success.

Tom Lamal
1734 Becker Ridge Road
Fairbanks, Alaska 99709



Proposals 78 – 85

SUPPORT 78 - 85

I have submitted proposals for early start dates for sheep hunters in the past and now there are nine more concerned Alaskan's requesting opening date changes. A proposal asking for early start dates for residents passed when it was first introduced but a backlash from the guides got the BOG to reverse its decision and the commercial operators have been able to fend off early start dates for resident hunters for several years.

These proposals have early openings for resident hunters, ranging from 5 to 10 days with seven days early being about the average and I think a week would work the best. I would like to see the nonresident dates pushed back in a few years but not now because the guides have probably already booked clients. Sheep hunting has more conflicts with guides and residents than any other hunt. Residents just want a quality experience. No other state allows an allocation of nearly 50% of a game resource to nonresidents – it's crazy. The frustration level is high and you are the folks we depend on to make correct decisions. We would accept the same type of respect that other states convey to their residents.

Western states seem to function very well financing their wildlife programs and they limit nonresident participation and try to groom trophy areas for their residents. Nonresidents can hunt in any of the western states without having to hire a guide or an outfitter.

We're on your side, so please treat us like an ally. You have all the data showing that this is a workable request and I have submitted it in the past. Some of the creative ideas presented by those opposing a preference for residents have done 180 turns from their past approaches – "anything to shoot this down."

Twenty-three proposals are unbelievable on one issue. I believe a "sleeping giant" is starting to wake up. The comment I get form the interested public is - "I don't get it. Why would anyone be against a preference for resident hunters?"

Tom Lamal
1734 Becker Ridge Road
Fairbanks, Alaska 99709

Tom Lamal



Proposal 88

SUPPORT 88

We're probably not too far away from everyone going on permits (Whoever thought there would be catch and release on fish), but before that happens the nonresident should be the first. This would generate more money for the State of Alaska and develop a system for developing other permit areas to create quality sheep hunts. I don't like the idea of everyone going on permits but as the pressure keeps increasing some tough choices are on the horizon. This would also be a chance to start preference points for nonresidents in drawing permits.

Tom Lamal
1734 Becker Ridge Road
Fairbanks, Alaska 99709

Tom Lamal



Proposal 89

SUPPORT 89

The State could make a lot of money under this system if it implemented four choices and developed a system of preference points. The department could manage the resource through out the whole state with one system. If everyone was on a permit, the department could open areas at different times. The Brooks Range gets snow much earlier than the rest of the state but those would be department decisions. If managed correctly, it would create quality-hunting situations.

Tom Lamal
1734 Becker Ridge Road
Fairbanks, Alaska 99709

Tom Lamal



Proposals 87-90

SUPPORT 87-90

Amended I feel that less than 10% is too restrictive for nonresidents. I support the proposals using 10% for nonresidents and 90% for residents. Oregon is 5% and 3% and that is just too slim of a chance to invest and some states like California are worse. Ten percent is what most states use as their cap number and we will have more permits available than other states so nonresidents will have a reasonable opportunity to be successful.

Tom Lamal
1734 Becker Ridge Road
Fairbanks, Alaska 99709

Tom Lamal



To: Cliff Judkins, Chairman, and all Members
 Alaska Board of Game
 Boards Support Section
 P.O. Box 115526
 Juneau, AK 99811-5526
 Fax: (907) 465-6094

December 29, 2011

Dear Game Board Members,

My name is Kurt Schmidt, currently I am a public educator in rural Alaska and for the past ten years have taught Science, English, Music and was also a School Administrator. I am also trained in the field of Wildlife Biology/Management.

I first came to Alaska 23 years ago to work as a Wildlife Biologist for the U.S. Fish and Wildlife Service. I worked as a Wildlife Biologist for 12 years, and frequently worked in several Western states as a private contractor/biological consultant conducting raptor and game bird research for the National Park Service, Bureau of Land Management, U.S. Forest Service and Oregon State University.

In 2010, I worked as a Biologist for the U.S Army and assisted in a study of Alaskan sharp tailed grouse in cooperation with Alaska Department of Fish and Game. Also I am an avid hunter and trapper for 40 years, and live a rural subsistence lifestyle. I have practiced Falconry for 20 years.

Over the years, I have lived in 7 different Alaska Game Management Units and am familiar with Alaskan Wildlife Resources and how State and Federal Regulations protects these resources.

In four states, and eight rural Alaskan communities, I have brought my Falconry raptors into classrooms to share with our young people the beauty of nature and to develop an awareness of conservation and industrial issues pertinent to raptor and ultimately human survival.

Presently, an unusual situation exists where the Federal Government is handing off the Administration of the Falconry program to the State Governments and requires that proposed Regulations be submitted to the USFWS for Federal approval in 2012. USFWS approval is required for falconry to remain legal in Alaska.

I urge you to adopt the AFA Falconry Proposal #38, and reject proposals #39 and #40.

The State set an April 2011 due date of Falconry Rule proposals thus allowing for adequate time for public review, comment and potential revisions, before submission and formal review by The Alaska Board of Game, and then ultimately BOG recommendation for submission to the USFWS for adoption.

PAGE 1 of 2 Cliff Judkins, Alaska Board of Game Chairman, and all Members 12/29/11

However the Alaska Department of Fish and Game released its rewrite draft of *Alaska Falconry Manual Number 9* in December of 2011, just a few precious working days before the Board of Game convenes to review tabled proposals.

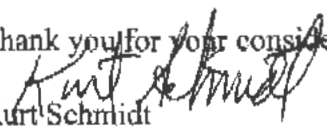
The Departments draft of the Alaska Falconry Manual No. 9, (proposal #39) is fraught with abundant errors. It deviates significantly from past Falconry Regulation Manuals and the variations appear to be careless errors in the draft and editing process. These subtle changes in wording actually increase the Administrative costs to the State and adds unnecessary red tape to the regulatory process.

It is apparent that the quantity of work required to resolve these problems exceeds the time available before the Board meets, therefore, **I recommend that the Board of Game reject Proposal No. 39 and use the AFA's Proposal No. 38.**

Most importantly, the AFA proposal No.38 has already been reviewed by the Chief of the Permits and Regulations Branch of the U.S. Fish and Wildlife Service's Division of Migratory Bird Management and is considered as acceptable for meeting the standards set by the new federal regulations.

Please adopt Proposal #38.

Thank you for your consideration,


 Kurt Schmidt
prairiegrouse@hotmail.com
 907-799-9202

PAGE 2 of 2 Cliff Judkins, Alaska Board of Game Chairman, and all Members 12/29/11



30 Dec 11

Alaska
Board of Game

I would like to declare my support for the following propositions before BOG for consideration and I do hope for adaption. They are numbers 66, 67, 68, 69, 71, 72, 73, 74, 76, 78, 79, 80, 81, 82, 83, 84, 85, 88 and 89. I believe these propositions would enhance Alaskan use of it's game populations and most especially the sheep population. These props would put Alaska more in line with every other Western state that manages with preference for their own citizens. The props would enable a more careful management of the sheep resource. I also think the props would encourage Alaska's youth to partake of the hunting experience, which I feel is a very good thing.

Thank you for your time,

Gary Halmstad

Gary Halmstad

3411 Lil's Way

Fairbanks, AK 99709

907 479-8850



ALASKA TROPHY ADVENTURES

P.O Box 874492, Wasilla, AK 99687

(907) 373-4898

DAN MONTGOMERY

Master Guide # 173

My name is Dan Montgomery. I have lived in Alaska for 30 years and have hunted in Alaska every year. I have been guiding in Alaska since 1985 and have had my own guiding business since 1993. I have been applying hunters in the draw permit system for 19 years. I am very familiar with this system. I am also a member of the Matanuska Valley advisory committee. I appreciate this opportunity to comment on the statewide regulation proposals that will be discussed at the state wide meeting from Jan.13-17, 2012.

Proposal 63---Oppose Mat Valley A/C voted 2-8-1 Against

I am adamantly against this proposal. If this proposal passes it would increase the number of draw permits you could put in for from 3 to 6 for every species. This is an ADF&G proposal and the only problem they seek to fix is issuing these permits over the counter because there is such a high demand. That is their job. There were 5 brown/grizzly bear non-resident hunts and 14 moose hunts that were undersubscribed and that is it. A total of 160 moose permits were left over with 74 of those in 2 hunts in the Nowitna river drainage. There are absolutely NO undersubscribed sheep, goat, elk, caribou, bison or muskox hunts. I am getting all of this information from the 2012 – 2013 draw hunt supplement.

ADF&G also states that no one would be hurt by this proposal, which is absolutely not true. If this proposal passes everyone will have less of a chance to draw the one hunt they really want because more people will be putting in for it and the only way not to have less of a chance overall is to apply for 3 more hunts (which they may not be enthused about) at a cost of \$15.00 for each species applied for. This proposal doesn't make more permits available, only more applicants for each permit. It's simple math. ADF&G could possibly double the



money they take in (but also have an increased computer input burden) and you would have less of a chance to draw the one hunt you really want to draw.

This proposal also opens the door for the big corporate application programs like Cabela's, who demand 15% of your gross, to dominate the non-resident draw applications by doubling the number of times they can apply their clients. Their influence will be more widely spread, to the detriment of the independent guides who have always relied on their reputations alone to book hunters and applicants, and who strive to keep costs down by NOT paying a booking fee.

The bottom line is this probably won't fix ADF&G's amount of left over permits and the only ones to gain by it will be the state, financially (although there will be a concurrent cost burden of more draw applications to process); and the big corporate application programs and the guides that work with them. Everyone else will lose.

PROPOSALS 64&65 Mat Valley A/C voted 9-0-2 in favor

I support these proposals. It is very difficult to do 2 hunts in a year let alone 3 or more. It would spread the wealth around and keep some permits from going unused, which is a real problem.

PROPOSALS 66, 67 & 68 Mat Valley A/C voted 3-6-1 against

I oppose all 3 of these proposals. Proposal #66 states a flat falsehood under ISSUE were he says that currently Alaska residents are on equal footing with non-residents. This couldn't be farther from the truth. The board has been using a system where they average the participation of residents and non-residents over a 10 years period and it seems to be fair. They should stick with this system.



PROPOSALS 72, 73 & 74 Mat Valley voted 5-5-1 Did not carry

I oppose these because they are too broad and they take away the Board's ability to adjust seasons when necessary. It is just one user group wanting to get a jump on the other and it is totally unnecessary.

PROPOSALS 78 thru 85 Mat Valley A/C voted 4-5-0 Against

I oppose all of these because from data that Joe Want has presented to the state, which member Ted Spraker has seen, there appears to be less than 50% of the legal rams harvested in any year. There is a real lack of effort and skill from many resident hunters when it comes to sheep hunting. The first 11 years I lived in Alaska I harvested a sheep and only one time did I hunt more than 2 days. The sheep are out there and if you get in sheep shape and understand the importance of stalking from above they really are fairly easy to harvest. We already have a very long, 42 day sheep season in most of Alaska and we don't need to make it longer to accommodate poorly skilled hunters.

Also by opening the season early you would possibly be putting 100 to 200 of the best sheep hunters in Alaska in the field hunting sheep for themselves, because they can't hunt them when they are guiding. I know some Alaska resident guides that have guided sheep hunters for 20 years and have never killed one themselves but they plan to if this passes.



Dec. 29th, 2011

Dear Alaska Board of Game,

Shame on all of you. I repeat...Shame on all of you.

I have read about your laundry list of actions in regards to grizzly bears during the past 15 years in the State of Alaska.

(A recent peer-reviewed article in the Journal of Wildlife Management claims that the State of Alaska has liberalized grizzly bear hunting regulations 124 times between 1995 and 2010.)

I have read in detail the article in the Sept 9th Alaskan Dispatch by Rick Sinnott.

(Does science back up Alaska's policy of killing grizzly bears?)

I have also read the "Trends in Intensive Management of Alaska's Grizzly Bears, 1980-2010."

How can you sleep at night as you selectively eliminate Alaska's symbol of greatness and wildness to suit your non-science based belief system and the subsequent execution-style of game management?

PLEASE NOTE: I support ACE's Proposal #127 which makes the snaring of bears illegal and I oppose Proposal #131 which would allow the snaring of brown bears.

I, as one Alaskan resident with a conscious cannot and will not support these actions.

YOU are the predator and you need to be controlled.

Stop the Madness now.

Shoshana Sadow
943 W. 19th Ave
Anchorage, Alaska 99503



LOREN J. KARRO
26239 E Buckshot Drive
Palmer, AK 99645
(907) 745-3712

December 29, 2012

Thank you for this opportunity to comment on the proposals before the Board of Game. I am a 30 plus year resident of Alaska, have lived and hunted from Southeast to the Northwest Arctic to my present home outside of Palmer, and am now a registered guide (#941).

Proposal #63: OPPOSED

With due respect to the ADF&G staff, I oppose this proposal. I believe it will offer no benefit to the resident or non-resident hunters of this state, making it statistically preferential to put in for the maximum of 6 separate drawing permits for each species desired and therefore increasing the overall number of drawing applications and decreasing the chance of getting drawn for a permit the applicant really desires. It will increase the influence of the large commercial booking agencies and drawing application services at the expense of resident and non-resident hunters (some resident hunters use these services as well so it could affect both pools). This will also be to the detriment of the Alaskan guides who do not wish to raise their fees to cover the high cost that these agencies demand from participating guides. The number of unused permits that ADF&G is complaining about seems mostly limited to those in a small number of brown/grizzly bear and moose hunts, yet this proposal will affect all drawing hunts for at least 8 separate species. Despite ADF&Gs claim that no one will suffer from their proposal, it will adversely affect many to solve a small perceived problem.

Proposals 78 through 85: OPPOSED

I oppose these proposals because the data does not seem to back up the claims that the guided hunters are taking all of the legal sheep. Joe Want has done considerable research which shows that less than 50% of legal rams are harvested each year, and that this appears to be a consistent trend throughout the last decades despite perceptions otherwise. We have a very generous sheep season in Alaska with opportunities for either drawing a tag or using an over the counter tag. The main cause of the disparity in opportunity between resident and non-resident hunters appears to be one of effort and knowledge. I have personally run into many residents who have drawn valuable unit 14C permits and thought they could kill the sheep from a main trail, and were not prepared to do considerable scouting and hiking. Worse yet, many of them never even hunt. If this does pass, I will be one of the resident hunters in the field early after my own sheep, which I have not had the time to pursue since I became a guide; and I would think many of the 100s of other resident guides would be out there also. This proposal would put another week of stress on sheep without addressing the real reason why many resident sheep hunters are unsuccessful.



To: the Alaska Department of Fish and Game Board
Re: Proposals 35 and 36 (Predator control in units 15A and 15C)
December 30, 2011

Fax 907-~~465-6094~~

Dear board members,
I am writing because of my concern over the proposed aerial wolf control in game units 15A and 15C on the Kenai Peninsula. I have several concerns:

- 1) As stated by numerous citizens and summarized by Bill Tappen, chair of the Kenai-Soldotna Fish and Game Advisory Board, the predator of concern for moose populations seems to be the brown bear. As cited in the Peninsula Clarion on October 29, 2011:

"The public spent an hour and a half not talking about wolves," Tappen said, "but about brown bears on the Peninsula — there's a notion on the part of some that there are too many brown bears on the Peninsula."

It seems that there should be more information and study about what is causing the decline in moose populations before a suitable solution can be implemented.

On the same note, the president of the local safari club admitted that bears are the problem, but since we can't control them we should shoot wolves. I don't see the logic in that statement as he even admits shooting wolves won't solve the problem — so why waste time and effort on that just "because we can"?

- 2) I am a resident of the area, and enjoy outdoor activities as do many tourists. Such drastic predator control measures are going to have a negative influence on both.
- 3) As has been shown in countless studies*, predators are an important part of a healthy ecosystem. In fact, the presence of wolves and other predators keep moose from overpopulating and starving and from destroying their own habitat and food sources. If adequate moose habitat is scarce, as was discussed by some of the biology experts, then having wolves will help improve the habitat by keeping the moose populations healthy and within sustainable numbers.
- 4) I realize many people find sport in hunting, but some people are using subsistence and having to feed their families as a reason to increase hunting populations of moose and therefore shoot wolves. There are not any families that I am aware of that *need* to shoot moose to survive. Some may have a hard time making ends meet, and there are other sources of help out there for those few. As for the rest, if you shop at a grocery store, you do not need to subsistence hunt!
- 5) A solution might be to decrease the number of hunting permits and let the ecosystem recover. There are always highs and lows as natural populations are never stable but



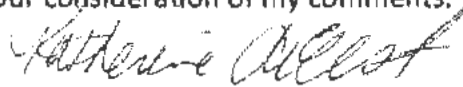
always in a state of change. If moose populations are currently at low levels, the logical thing to do is let them recover without interference by humans...this means decrease the hunting and let the populations recover.

*Bibliographies from

Where the Wild Things Were by William Stolzenburg. ISBN 10: 1596912995

In Praise of Wolves by R.D. Lawrence ISBN 9:780345418029

I am a high school science educator, and a resident of the Kenai Peninsula. I appreciate your consideration of my comments.



Kathy East
1610 Silver Pines Rd.
Kenai, AK 99611

907-398-5440



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

December 29, 2011

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

JANUARY 2012 STATEWIDE CYCLE B BOARD OF GAME WRITTEN COMMENTS

Dear Alaska Board of Game Members,

Please find the following comments for your consideration regarding proposals you will be addressing at your Statewide Cycle B meeting in Anchorage. The Alaska Professional Hunters Association Inc. (APHA) has serious concerns with the scope of many of the proposals you will be addressing at this meeting. The professional guide industry represents a significant and important rural economy in Alaska which is dependent upon prudent stewardship and conservation of Alaska's wildlife.

APHA has also been at the forefront of professional guide industry advocacy working to address perceived negative social and wildlife/wildland conservation impacts generated by the guiding industry. During the past six years we have achieved substantial goals to this affect with the establishment (Dec. 2005) of the Big Game Commercial Services Board (BGCSB). This Board has developed new professional licensing standards which have set the standard for being the best in the world. There are a few aspects of professional guide licensing in differing African countries that may rate as high as the standards that Alaska has now set, but overall we have the highest. What this means to you is that because of the higher bar of licensing being established, fewer applicants are passing the test annually and those who do have to have an much better understanding of social atmosphere concerns than previously.

As well, the proposed Department of Natural Resources/ADF&G/BGCSB Guide Concession Program is in its final stages of development. Once implemented, this program will substantially help to resolve conflict in the field concerns. Tremendous work by numerous State agencies including the Board of Game has been put into development of this program which is designed to restrict guided hunting activity on State lands. Selection criteria for this competitive program as proposed, will include substantial credit given for the applicants consideration for resident hunters and other user groups encountered in the field as well as wildlife conservation concerns within their plan of operations.

Many of the proposals you will be considering at this meeting seek to eliminate or restrict existing non-resident hunter opportunity in some manner. There are numerous reasons for APHA to urge caution and restraint in regards to support of these proposals related to balance for the whole considerations.

Please consider the following factors when addressing these proposals:

1. By eliminating non-resident hunters or by giving special season dates for resident-only hunters we further fragment the hunter/conservationist fraternities. The perceived conflicts will not disappear from the field, rather they will continue to be replaced and possibly escalated within different user groups. Let's turn together as hunter conservationists before we turn away from each other. Every time we turn away from each other as hunters we give success to those who work to eliminate our way of life.
2. If we can encourage the turning together and work together as the hunter conservationists we are, Alaska can and will be one of the greatest places for all people to enjoy wildlife, as subsistence hunters, as general resident hunters or non-resident hunters we have a common bond. Wildlife conservation measures that provide for abundance, for sustained yield and maximum benefit provides for the best interest of the whole and we encourage this board to continue to do the great job they have been doing to help provide that balance.
3. APHA has no support for any of these reduce, eliminate or restrict nonresident opportunity proposals as written. None of them have been submitted from a conservation based concern and to consider them on a statewide basis is unreasonable and unfair.
4. Many long established professional guide businesses will be negatively impacted and or put out of business if any of these proposals were to pass. In many cases, there are very few resident hunters that hunt in the regions where many guides operate. To impact their businesses with preferential resident hunter privileges and thus provide a commercial transporter incentive to fill the void goes strongly against our constitutional mandate of maximum benefit.
5. Several of these proposals express concern over perceived crowding of guided hunting activity on public lands. Please understand that eliminating non-resident hunting activity will not eliminate transporter or other hunting parties. The perceived conflicts will continue or even be enhanced as the transporter industry has no conservation basis as a professional guide must.
6. Alaska Statutes 08-54-720 clearly defines unlawful acts related to the guiding industry and of the 19 items listed therein, #2 states that it is "illegal for a person licensed as a guide to intentionally obstruct hinder or attempt to obstruct or hinder lawful hunting engaged by a person who is not a client of the person".

Additionally, AS 16-05-790 defines similar protection of hunters through the Hunter Harassment Law. If there are bad things going on within this scope, let's first turn to existing law, and enforcement of it before we start eliminating an important industry, hunting opportunities, meat sharing and allot of peoples ways of life.

7. According to ADF&G reports, approximately six percent of the annual human harvest of caribou, ten percent of the human harvest of moose and forty percent of the human harvest of Dall's sheep are harvested during general State regulated hunting opportunities. If the Federal harvest and unreported harvest factors are considered as well, the percentages of nonresident harvest drop several points even lower.
8. Nonresident license fees are added to by multiplying them times three with the matching Pitman-Robertson funds make up the majority of ADF&G Wildlife Conservation Division budget. Nonresident annual harvest percentage of moose, caribou and sheep is low in comparison with the wildlife conservation funding (approximately eighty percent) they provide. Eliminating nonresident opportunity as many of these proposals request will result in an immediate and large shortfall of important conservation funding for ADF&G which will eventually result in overall resident hunter opportunity loss as well.
9. Also important to this equation is that Alaska's annual human harvest of these wildlife resources represents something near six percent of the annual mortality of these species while predation accounts for approximately eighty-four percent.
10. Intensive management increases actual costs to achieve prudent wildlife conservation goals that provide for the best interest of our wildlife and all people who enjoy or depend on them. When you eliminate non-resident opportunity, you eliminate vital funding needed to enhance and conserve wildlife for the best interest of the whole.
11. When non-resident hunting opportunity is reduced or eliminated, a substantial part of the annual predator harvest which occurs during the ungulate hunts is also reduced or eliminated. When you eliminate this non-resident harvest, you eliminate in most cases, the most significant annual predator harvest as well. .
12. Few if any of these proposals are generated from concerns related to Federal lands where guide industry *concessions* are incorporated which limit the number of guides per geographical region. Currently, the proposed DNR/ADF&G/BGCSB Guide Concession program development is in its final stages and implementation of the program will help dispel the perceived conflicts.
13. Over sixty-five percent of Alaska's lands are federal domain and nonresident sportsmen and women pay for upwards of 80 percent of our wildlife conservation funding. Alaska represents by far the greatest divide between resident and non-resident licensing fees of any state. Nowhere else in the US do residents pay so little for so much in relation to hunting privileges. Alaska needs additional funding for wildlife conservation in a very

serious way and the only tool we can find support for is increasing non-resident hunting license and tag fees. As our economy and especially our rural economy needs as much bolstering as possible, it seems as though maybe we are pushing this delete non-resident opportunity envelope in a manner that could have great adverse consequences.

14. The Board of Game has a policy related to basing nonresident and resident hunter opportunity when implementing a drawing permit program. This policy requires the Board to look at the previous ten year history of effort between nonresident and resident hunters and to make the drawing permits available on that defined basis. This is a fair mechanism and should be continued.
15. It has been proven within the guide industry throughout the Western US States that when a limit of ten percent of hunting opportunity is provided to nonresident hunters, and guides have to compete with other guides to secure the hunters as clients, that a viable guide industry cannot survive. The broad overhead cost of maintaining a viable business cannot be supported on the “luck of the draw” concept.
16. Alaska is different than the rest of the US where we often hear comparisons of. It is important to note that the Alaska Guide Required law is vitally important to the resident hunter. One of the key points is its application to wildlife conservation by restricting non-resident opportunity. Compare all of the other states that do not have this law and see what challenges exist for quality big game hunting opportunities. They are nearly 100 percent allocated by very restrictive drawing permits and many residents who live in the heart of these areas never receive a permit to hunt in these hunts.
17. Montana recently underwent a loss of nonresident hunter opportunity due to a ballot initiative that did away with landowner tags. The result was catastrophic loss of funding to Montana Fish Wildlife and Parks for important wildlife conservation programs. Alaska cannot afford this.
18. When looking at the affluence of guides in relation to user groups as a criteria for support of these proposal we would encourage you to consider the resident hunter in this group as well in comparing hunter prowess and success. Of course nonresident hunters have a higher success rate as they are required to secure the services of a professional guide and they hunt for more days than the average Alaska resident.
19. The number of resident hunters who use airplanes to find and then harvest animals, or that have mechanical means to access what used to be hard to access remote regions are growing in number. They also contribute substantially to the perceived conflicts in the field. Professional guides are already restricted by law (with the exception of some spring bear seasons) from using an airplane to find an animal with the intent to harvest that animal. Resident hunters are not thus restricted. Again, if problems do exist, allow for existing law to be applied.

20. APHA strongly supports the data and comments provided by Dr. Wayne Heimer, Mr. Joe Want and the Wild Sheep Foundation regarding many of these proposals.. We urge you to review their comments.
21. APHA has concerns about the nature of these proposals which lack any proof of issue and have no biological or conservation basis. We urge you to explore the actual documented problem to define if it is real.
22. There does exist the serious question of “Can the Board of Game in such a serious manner legally separate one user group from another.” Certainly, related to wild sheep which are not covered under the Intensive Management Law, the question is raised about how a preference would be provided without addressing the Tier I or Tier II hunt aspect, and qualify them as an Intensive Management Species, develop C&T and ANS findings statewide? These proposals have broad sweeping changes and impacts on the future of hunting and wildlife conservation in Alaska, none of which we view as beneficial to the whole.
23. When you eliminate the nonresident hunting opportunity and the guiding industry you also eliminate very historical and important economy and meat sharing aspects which are important to Alaska and our future.

PROPOSALS THAT APHA OPPOSES: 46, 48, 49, 51, 63, 66, 67, 68, 71, 72, 73, 74, 75, 76, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 92, 93, 94, 97, 105, 108, 114, 121, 125, 126,

PROPOSALS THAT APHA SUPPORTS: 47, 59, 70, 91, 106, 113, 118, 129, 132,

PROPOSALS THAT APHA SUPPORTS WITH AMMENDMENT: 44, 45, 99, 130, 131

PROPOSALS THAT APHA HAS COMMENTS ON BUT DEFERS TO THE CONSIDERATION OF THE BOARD: 69,

INDIVIDUAL PROPOSAL COMMENTS

PROPOSAL 44; SUPPORT WITH AMENDMENT. Amendment should include language that requires these special hunts to be conducted within existing guide law parameters.

PROPOSAL 45; SUPPORT WITH AMENDMENT. We would suggest there be some kind of record established that this would not diminish the Director's authority to prohibit barter for conservation and other purposes.

PROPOSAL 46; OPPOSE. APHA has serious concerns related to conservation and commercialization with this proposal. If trophies can be routinely sold there will soon be a market for them and people taking to the field to shoot animals to satisfy the new trophy trade. We recommend there be some special permit arrangement under which a person can apply on a trophy by trophy basis, to sell them under special circumstances such as within proposal 47.

PROPOSAL 47; SUPPORT. Based on it's given merits. Please see our comments for proposal 46.

PROPOSAL 48; OPPOSE. The State is under no obligation to buy into the NPS concept about non-management. State primacy in this field is confirmed by ANILCA section 1314. Plus, the proposal is wrong as a matter of federal law. 16 U.S.C. section 3 (part of the 1916 National Park Organic Act) specifies that "the Secretary of the Interior shall make and publish such rules and regulations as he may deem necessary or proper for the *use and management* of the parks." The same provision also provides the following: "he may also provide in his discretion for the destruction of such animals and of such plant life as may be detrimental to the use of any said parks, monuments, or reservations." This was the authority the agency used for years to control bison numbers in Yellowstone, kill mountain lions, etc. There is no need for the Board of Game to cede the State's authority under ANILCA section 1314, disregard the 1916 Organic Act authority under 16 USC 3, and buy into NPS policy.

PROPOSAL 49; OPPOSE. We consider it too intrusive.

PROPOSAL 51; OPPOSE. We believe it is too restrictive.

PROPOSAL 59; SUPPORT. Based on it's given merits.

PROPOSAL 63; OPPOSE. We prefer status quo for fairness purposes.

PROPOSALS 66, 67, 68; OPPOSE. Please see pages 1-4 of this document for our comments on these proposals.

PROPOSAL 69; DEFER TO DISCRETION OF BOARD.

PROPOSAL 70; SUPPORT. Based on it's given merits.

PROPOSALS 71, 72, 73, 74, 75, 76, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90; OPPOSE. Please see pages 1-4 of this document for our comments on these proposals.

PROPOSAL 91; SUPPORT. There needs to be consistency statewide on this issue. When a guide service provider has limited drawing permits available and has to maintain the overhead expenses of operating his business he cannot compete with the second degree of kindred permits and maintain a viable business. Please note that the non-resident second degree of kindred applicants would have a higher chance of drawing a permit than if they are contained within the non-resident pool.

PROPOSAL 92; OPPOSE. Prefer status quo.

PROPOSAL 93, 94, 97, 108; OPPOSE. The State is under no obligation to buy into the NPS concept about non-management. State primacy in this field is confirmed by ANILCA section 1314. Plus, the proposal is wrong as a matter of federal law. 16 U.S.C. section 3 (part of the 1916 National Park Organic Act) specifies that "the Secretary of the Interior shall make and publish such rules and regulations as he may deem necessary or proper for the *use and management* of the parks." The same provision also provides the following: "he may also provide in his discretion for the destruction of such animals and of such plant life as may be detrimental to the use of any said parks, monuments, or reservations." This was the authority the agency used for years to control bison numbers in Yellowstone, kill mountain lions, etc. There is no need for the Board of Game is cede the State's authority under ANILCA section 1314, disregard the 1916 Organic Act authority under 16 USC 3, and buy into NPS policy.

PROPOSAL 99; SUPPORT WITH AMENDMENT. This proposal should be specific to boat-based transporters.

PROPOSAL 105; OPPOSE. APHA supports the wounding constitutes harvest for all species statewide. We disagree strongly with the proposer that this is a guide concern. We believe it is a hunter's ethics concern and should be instilled in all hunters.

PROPOSAL 106; SUPPORT. Based on its given merits.

PROPOSAL 113; SUPPORT. Based on its given merits.

PROPOSAL 114; OPPOSE. We oppose this proposal on a statewide basis based on historical abuse and affiliated conservation concerns related to same day airborne hunting.

PROPOSAL 118; SUPPORT. Based on its given merit.

PROPOSAL 121, 125, 126; OPPOSE. The State is under no obligation to buy into the NPS concept about non-management. State primacy in this field is confirmed by ANILCA section 1314. Plus, the proposal is wrong as a matter of federal law. 16 U.S.C. section 3 (part of the 1916 National Park Organic Act) specifies that “the Secretary of the Interior shall make and publish such rules and regulations as he may deem necessary or proper for the *use and management* of the parks.” The same provision also provides the following: “he may also provide in his discretion for the destruction of such animals and of such plant life as may be detrimental to the use of any said parks, monuments, or reservations.” This was the authority the agency used for years to control bison numbers in Yellowstone, kill mountain lions, etc. There is no need for the Board of Game to cede the State’s authority under ANILCA section 1314, disregard the 1916 Organic Act authority under 16 USC 3, and buy into NPS policy.

PROPOSAL 129; SUPPORT. Based on its given merits.

PROPOSAL 130; SUPPORT WITH AMENDMENT. Amendment requesting USFWS to increase hunter opportunity within the guide industry in this region.

PROPOSAL 131; SUPPORT WITH AMMENDMENT

As a State, Alaska has begun the long recovery of rebuilding and re-establishing our stewardship mandates regarding our precious wildlife populations. This momentum has been achieved primarily because of a number of like-minded conservation organizations involved with public policy making, helping to establish the tools to help you respond to important biological and conservation based concerns. APHA has been a significant part of this effort. Please know that your programs are working and are generating the much needed relief and better stewardship for Alaska’s wildlife.

APHA feels that it is very important that you consider the whole of the achievements that have been made and what the benefits have been to our wildlife in these regions as well as what we can do to assist with these type of efforts in other needed regions. It is important to note that there have been numerous dynamics that have been implemented on this *road to recovery* so to speak regarding our wildlife conservation enhancement and Intensive/Predator Management programs.

What we do know is that these dynamics are working to a certain degree and have stood the test of legal challenge and public acceptance. APHA therefore urges caution to you regarding initiating new methodology that may disrupt the public acceptance of the ongoing programs.

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

APHA asks for your support in developing expansion of management programs intended to grant relief to predator and prey imbalances. We urge your support for these initiatives where and when possible in keeping with maintaining the whole of the programs statewide. The predator management programs provide for development of our constitutional mandates of sustained yield, abundance and maximum benefit which provides for the best interest of the wildlife, and all people who depend on and enjoy prudent management.

With these comments made, we have concerns with this proposal in regards to the inclusion of brown bears of any age class, snaring of brown bears, conservation of brown bears and the large size of the region. We would like to recommend that the brown bear aspect of this proposal be handled on a strategic basis related directly to identified problem bears and that the harvest of these particular bears be conducted by ADF&G personnel.

We encourage an amendment to this proposal that would address these concerns.

PROPOSAL 132; SUPPORT. Based on it's given merits.

END OF APHA COMMENTS

Respectfully Submitted on behalf of the Board of Directors of the Alaska Professional Hunters Association Inc. by:

Robert R. Fithian
Executive Director

REGISTERED GUIDE

FAIR CHASE HUNTING

Sam Rohrer
 P.O. Box 1388
 Kodiak, Alaska 99615
 Ph: 1-907-486-4074
 Fax: 1-907-486-8829
www.kodiakbearcamp.com
sam@kodiakbearcamp.com



Brown Bear
 Mountain Goat
 Sitka Blacktail Deer
 Family Trips
 Fishing
 Trek

BOG Members,

I strongly urge you to oppose Proposal 50, 66, 67, 68, 71, 72, 73, 74, and 75.

Proposal 50

ADF&G needs the ability, at the local level, to apply discretionary conditions to permit hunts. As a 31 year resident of Kodiak and a 9 year member of the KARAC (Kodiak and Aleutians Regional Advisory Council) I have seen how we have been able to bring affected user groups in Kodiak together to reach local compromises. Often, it is the discretionary conditions that the local biologist is able to apply to the hunt that becomes the keystone of these compromises.

Removing the biologist ability to apply discretionary conditions to permit hunts would severely affect management plans that have been functioning successfully. It would also set back years of effort by local user groups who have worked together in the spirit of compromise. I strongly encourage you to consider each regulation and management plan in its total context before considering amending or deleting any of its discretionary conditions.

Proposals 66, 67, 68

These proposals would have significant negative effects on nonresident big game hunting opportunities in Alaska and significant financial ramification for the State of Alaska. The nonresident hunting industry in Alaska represents over 200 million dollar economic benefit annually to Alaska. In addition their license and tag fees are matched at a rate of \$3 for every \$1 spent, through the Pittman-Robertson Act. For example, if a nonresident buys a hunting license for \$85 and a sheep tag for \$425, for a total of \$510, the State of Alaska is given an additional \$1530 from the Federal Government. These monies amount to as much as 75% of ADF&G's Wildlife Conservation budget.

If these proposals went into effect, it would substantially reduce the number of nonresident hunters coming to the State of Alaska, in turn reducing the amount of money spent here, as well as causing substantial budget shortfalls for Wildlife Conservation.

I strongly encourage the board to follow their established policy of reviewing the 10 year history for each permit hunt when deciding allocation issues. This needs to be done on a case by case basis, not on a state or regional wide basis.



Proposals 71,72,73,74,

Opening resident seasons one week before nonresident seasons will raise serious biological, management and enforcement concerns. Hunt dates are often set in relation to biology, for example: breeding, birthing, and rearing times, in effect, working to protect game when they are the most vulnerable. In many cases if hunts were opened early it would directly interfere with this.

Hunt dates are also set to limit hunter conflicts in the field, for example, on Kodiak, the Raspberry Island Elk hunts DE702 and DE704, are permits for the same hunt area but different dates. If resident hunter seasons started one week early, we would have resident hunters with a DE704 permit hunting in the same hunt with resident and nonresident DE702 permit holders.

If these proposals are enacted, all season and hunt dates statewide will have to be reevaluated and adjusted. This would be a regulatory nightmare for the board.

Proposal 75

I understand the reason for this proposal and support the overall goal of this proposal, getting more youth hunters into the field. This is a noble goal that all user groups should support. However, this is not the right way to accomplish it, due in part because of my concerns addressed in the previous section. There are better ways to promote getting more youth hunting. Any considerations for this goal must be done on a case by case basis, not on statewide, one approach fits all.

Again I strongly encourage you to oppose Proposals 50, 66, 67, 68, 71,72,73,74, and 75.

Thank you for your efforts in keeping our hunting traditions alive in Alaska, and for your substantial time commitment to our great state. And thank you for considering my comments.

Sincerely,

Sam Rohrer



3 pages

Katmai Guide Service

JOE KLUTSCH, MASTER GUIDE

December 29, 2011

Attn: Board of Game Comments
alaska Department of Fish & Game
Boards Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Members of the Board of Game,

Following are comments regarding proposals you will consider during this meeting. I will offer a short background for those of you who do not know me. My wife and I have lived in bush Alaska for almost forty years now. For all of those years I have worked as full time hunting and fishing guide and spent many years on the trap line. I have also served for thirty years consecutively on the Naknek/Kvichak Fish & Game Advisory Committee and attended many many BOG and BOF meetings. I am very grateful for your time and dedication to this process and the conservation of Alaska's Game resources.

My comments will focus on individual proposals as well as groups of proposals.

PROPOSAL

- #44 Support - Limit to occur within existing guide outfitter assigned use areas. Governors permits should not convey hunting privileges not available to other citizens.

- #46 The sale of big game trophies should only be allowed under very specifically defined circumstances. A generally allowed sale of "trophies" will evolve into cold commercialization of game animal hunting and ultimately result loss of legitimate hunting privileges.

- #48 Reject - It is the jurisdictional authority of the state to make these determinations. State primacy in this matter is confirmed by ANILCA section 1314.



page 2

The maker of this proposal is wrong as a matter of federal law. 16 U.S.C. section 3 (part of the 1916 National Park Organic Act) specifies that "the Secretary of Interior shall make and publish such rules and regulations as he may deem necessary or proper for the use and management of the parks." It may be the current NPS policy to pursue a hands off natural approach to fish and wildlife, but the policy can always be trumped by statutory authority. There is no need for the BOG to cede the states authority under ANILCA section 1314 and disregard the 1916 Organic Act authority under 16 USC 3. This fact should apply to other proposals made by this same person which attempt to assert that separate rules and methods and means must apply within National Park Preserves.

#66 reject

67 reject

68 reject There are generally no biological justifications for these proposals. In many instances there is only a perceived disadvantages in allocation opportunity. for many hunts there are general resident seasons and subsistence seasons which afford additional opportunity for residents only. The BOG may only provide for a preference for residents over nonresidents in the case of Moose and Caribou. Sheep are not a subsistence species therefore it appears it would require a Tier II hunt for this species which would require a case by case finding to warrant these restrictions.

#71,72,73,74,75,76,78,79,80 through 90 Reject

These proposals are not warranted. They ignore the fact that sale of nonresident license and tags generate 70 plus % of the Division of Wildlife conservations budet. Many residents are asking for 90% of the allocation for 10% of the finacial support for management. Many regularly assert that nonresident hunting is all about the "trophy" and that meat is of no significants. This is incorrect. ALL THE MEAT from animals taken by my hunters is properly cared for and shared with members of our village communities many of which cannot afford to hunt the more remota regions of the state. The economic benefits for my family and guides who work for me are huge and community benefit as well. Nearly all of our hunting is done in



page 3

areas where general residents and subsistence hunter rarely if ever frequent.

Thank You for your consideration of these comments.

Sincerely,

Joe Klutsch

A handwritten signature in black ink, appearing to be 'JK' with a stylized flourish.

To Alaska Board of Game

Boards support section

To whom it may concern,

My name is David Scheidt. I have been a licensed falconer with the state of Alaska for over 30 years. I hold a Bachelors of Science degree in biology and work closely with the locale veterinarian here in Valdez, Alaska for the care of birds of prey. Dr Kathrine Hawkins holds a rehab permit for birds of prey and has listed me under this permit.

Each year I make multiple trips up the road from Valdez as far as Glennallen to rescue Eagles, Owls, Hawks and falcons. I get the birds back to Valdez and to Dr Hawkins. I have a 47 ft by 16 ft hawk house with a special room for rehab birds. As a falconer I also have the knowledge and experience to care for these birds until we can safely send them to TLC in Anchorage.

When asked to I also give presentations to the Schools and special events pertaining to birds of prey.

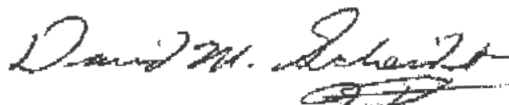
I really love doing this kind of service and in my talks I am always proud to point out the relationship of the falconers and the ADF&G and the Fish and Wildlife as it pertains to the rescuing of these beautiful birds.

"Please adopt proposal #38 as written by the Alaska Falconers Association"

I appreciate all the cooperation I have had with both departments over the years.

Thank you so much.

David Scheidt



Alaska Board of Game

Fax: 465-6094

December 30, 2011

This is to oppose non-resident take of falconry birds in Alaska. There are several reasons for my opposition.

Those who have lived here more than a few years have seen that most experiences once taken for granted, have been degraded to an extreme degree in recent years.

I took my father and 10 year old son fishing on the Deshka River in the sixty's and we were the only boat on the river. We caught a boat load of fish. Now you can't land on the river because there are too many boats to be safe unless you leave Anchorage in the middle of the night.

I took my boys sheep hunting for the first time when they were ten. We simply parked the car and hiked in . . . and we got our sheep.

These experiences are long gone. We don't need to make the same thing happen to falconry.


The result of establishing a non-resident take are far ranging and aren't hard to figure. Tens of thousands of falconers exist worldwide, and many of them dream of a wild taken Alaska bird. More biologists would be needed to keep track of populations across Alaska. Local restrictions on numbers allowed. More regulations will be required to regulate the sport. More enforcement personnel to regulate the regulations. Someone will have to pay for all of this and it'll be us through higher fees. And more strangers looking up at your favorite aerie when you go to take your bird. They'll find the easy ones first.

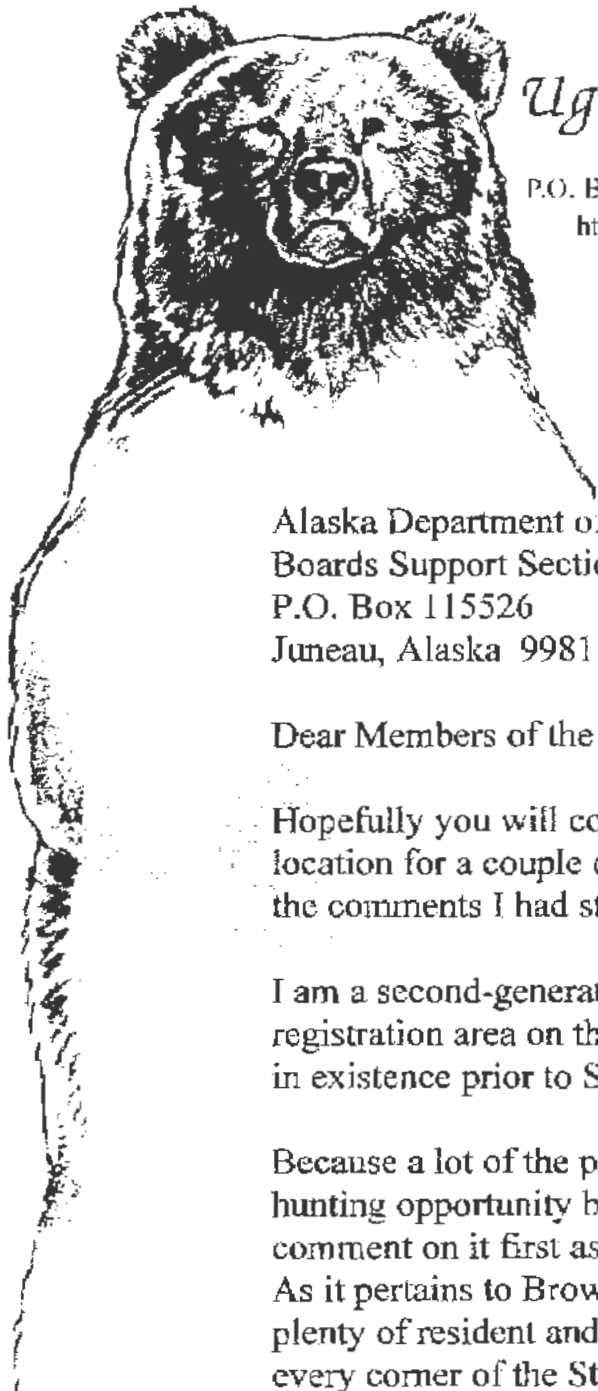
And most dangerous of all, more national attention toward a sport. Anyone remember PETA?? And how about the feds passion to regulate everything on federal land? The vast majority of Alaska is owned by the feds and the feds are possessive. A lot of political pressure from outsiders is from brocders, many with wealth and powerful political connections. They'll have way better access than any Alaskans to federal regulators and congress. The feds will very likely pluck many issues right out of our Game Boards prevue and take them to DC.

My hope is that you hold the line on non-resident take of falconry

Sincerely,

Burt Bomhoff





GUS LAMOUREUX'S

Ugashik Lake and Kodiak Bear Camps

Master Guide/Outfitter

P.O. Box 90444 Anchorage, Alaska 99509 ph 907-248-3230 fx 907-245-7338

<http://www.alaskafishandhunt.com> e-mail info@alaskafishandhunt.com

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

Dear Members of the Alaska Board of Game,

Fri, Dec. 30, 2011

Hopefully you will consider my late response. I was stuck out in a remote location for a couple days longer than I anticipated and had no way of finishing the comments I had started.

I am a second-generation hunting guide in a permit area on Kodiak Island and a registration area on the Alaska Peninsula. I run a family business that has been in existence prior to Statehood.

Because a lot of the proposals this season suggest eliminating non-resident hunting opportunity by limiting the amount of permit allocation I felt I should comment on it first as it would devastate my hunting business on Kodiak Island. As it pertains to Brown Bear permits, it should be considered that the State has plenty of resident and non-resident Brown Bear hunting opportunity in just about every corner of the State. Reducing non-resident permit allocation to 10 % will probably amount to each outfitter on Kodiak Island (example only) drawing about one client per two years if that. The viability of that is impossible and I for one would move on to greener pastures. The far reaching consequence of this would extend to the air taxi's that do my flying work, the economy of the city of Kodiak would be greatly impacted (non-residents spend way more than residents in local gift shops and often spend additional nights to take in a new place) and hotel and rental business will suffer incalculable losses.

Alaska is a huge State and monies derived from non-resident license and tags represents a tremendous amount of the ADF&G's Conservation budget. Take this away and every sportsman will suffer. Resident hunters will have to pay more to make up this shortfall or loss of revenue.



There are laws on the books that restrict interfering with other people hunting in the field.

Crowding will not be reduced with a 10% non resident allocation as transporters will quickly fill the void exercising much less respect for the resident hunter than a guide operation. My policy is for my people to avoid resident hunters at all costs unless they are experiencing an emergency.

I am opposed to every proposal that suggest a 10% allocation of permits to non-residents. Proposals #66, 67, 68.

Additionally, I am opposed to Proposals #71,72,73,74,75,76,77,78,79,80,81,82,83,84,85,86,87,88,89, 90,46,47 and 51. All hunters should be considered equals whether they are in the field or on a street, after all, we were all created equal. Why should one class of people exercise a right another cannot enjoy?

I do support proposals #99 which I believe will reduce crowding in many areas.

Support #106

Thank You for your consideration on these comments that could greatly impact the out come of my life.

Sincerely,

Gus Lamoureux



Roy & Charlene Huhndorf
PO Box 39248
Ninilchik, AK 99639
PH. (907) 567-3568
Email royhuhndorf@aol.com

December 30, 2011

Alaska Board of Game
Boards Support Section
PO Box 115526
Juneau, AK 99811-5526

SENT BY FAX to (907) 465-6094

Dear Members of the Board:

We are life long residents of Alaska and recent transplants to the Kenai Peninsula. We are not animal rights extremists as we believe in and have participated in fishing and hunting for food. We love and appreciate Alaska, its natural beauty and its plethora of wildlife.....all kinds. We sincerely hope you vote NOT to allow aerial wolf hunting on the Kenai Peninsula.

We have observed over the years the decline in the moose population but do not believe that wolves are the primary cause. While it is true that wolves take moose and bears take even more, we believe that overhunting, poaching, and car collisions cause an enormous rise in moose mortality. The last time we noticed, the road signs reporting moose/car collisions for the year on the Peninsula indicated the number was approaching 300! According to conversations we hear, poaching is rampant. If there is a critical shortage of an Alaskan animal, hunting should be allowed ONLY for Alaska residents and ONLY for food until the numbers rise to an acceptable level.

Alaska's wildlife is here for ALL of us....not just hunters, As you are all aware, the number of residents and tourists who travel the state to photograph animals and enjoy the privilege of watching them in their natural habitat is growing and will continue to grow. It is a huge industry in Alaska now and will get bigger every year.....unless you manage the "resource" only for hunters. It is unfortunate that the board membership does not reflect the large number of Alaskans who hunt with their cameras. Is there even one seat dedicated to that population?

Reflector lights were recently installed on the road near Ninilchik to help drivers see moose at night. They work. Last summer road crews removed trees and underbrush for a considerable distance on either side of the road so drivers could be aware of moose browsing near the road. It works. Please increase those projects and attempt to come up with other solutions before you allow the destruction of wolves from the air. It would be a travesty.

Thank you for your consideration of our comments.

Sincerely,

Roy Huhndorf

Charlene Huhndorf



Science Now Project Comments

Statewide Board of Game 2012

Att: Scott Cross
Public Comment
BOG Statewide
2012
RECEIVED

December 30, 2011

DEC 30 2011

Chairman Judkins and Board Members,

BOARDS
ANCHORAGE

Beginning in 2002 with the Murkowski administration the unprecedented political manipulation of Alaska's wildlife management entered its darkest period since statehood.

Since 2002, recognized scientific management principles are increasingly being marginalized. The situation has become so bad and science is now considered so "dangerous" to the special interest political beast, that the cornerstone of the foundation of our states management of its wildlife assets, the Alaska Department of Fish and Game (ADF&G), has been formally hijacked by political appointees in 2009, with the sole agenda of silencing any dissenting scientific voice in the department which challenges the political caucus currently sanctioned and supported by Governor Parnell.

Within a few months of the appointments under the Parnell administration, the political insurgents immediately implemented the departments first "gag" order Appendix A, which effectively silenced all dissenting opinions within the department's scientific staff.

The department's scientific staff can no longer represent the best science or promote management policies that benefit all Alaskans, now they are forced to be obedient lap dogs of the political machine and too speak with forked tongues when told to do so, and for the first time since statehood their very jobs are on the line if they disobey. The Director of the DWC, which once was a career biologist, is now nothing more than a hired executioner with no scientific degree at all. A politician controlling not only staff positions, but the distribution of scientific research funds within the department as well. Unbiased scientific inquiry for the maximum benefit of the resource is no longer an option.

Of course, this could not have pleased the current Board of Game anymore, a Board composed exclusively of political appointees whose membership includes three commercial guides of its seven voting members. Now that certainly shines a clear light on who funds the political caucus decimating the ADF&G does it not?

In this political landscape, the Board won't have to deal with the troublesome science that rebukes the political rhetoric now in control of the ADF&G. There will be no checks or balances, and most importantly, no discussion that the political beast does not approve of. The representative from the Department of Law (DOI), supposedly advising the Board representing the public, will sit quietly as the Board ignores state law when it benefits the "caucus" agenda. The blatant abuse of the Administrative Procedures Act which protects adequate public notice and equal public participation

(907) 223-0218 / sciencenowproject@gmail.com

Page 1 of 8



in the Board process is now a standard operating procedure for both the ADF&G and the Board of Game.¹

The downward spiral has yet to reach rock bottom it appears. At this meeting of the Board of Game the political beast is now attempting to set the bar at its lowest point by blatantly commercializing the harvest of wildlife and promoting a blind allegiance to financial profit at the expense of natural diversity on a scale unprecedented since statehood. Nature simply cannot be allowed to run wild, at least not when corporate profits are at stake, not when a game farm policy would “save” short term profits.

Alaska became a state primarily to ensure our wildlife resources were managed for the benefit of all the residents of Alaska, not an unsustainable game farm for unlimited nonresident trophy hunting.

When Alaska gained statehood, the framers of our constitution drafted a unique document compared to other states in the union. Our constitution provided the “equal access clauses”² which applied to **all residents** and guaranteed residents priority for their subsistence needs over any other consumptive take of wildlife.

Alaska’s constitution specifically “prohibited the state from granting to any person or group privileged or monopolistic access to the wild fish, game, waters, or lands of Alaska”.³ The framers of our State constitution also went to great lengths to shield the ADF&G from political manipulation. They were all too familiar with the abuse that the promise of financial gain created.

Unfortunately, the wholesale back door politics preferred by the current administration appears to have no concern for our states founding principles for wildlife management.

Short term financial profit is the overriding agenda. Management grounded in science with a goal of conserving the long term health and productivity of our states ecosystems on a landscape level, which demands cooperation with our federal land managing partners, is ignored. Instead, the promise of short term profits that satisfy the short term political demands of radical political special

¹ With no public notice at the 2010 Statewide BoG meeting the ADF&G amended a proposal in the last minutes of the meeting to allow the trapping of black bears. In the subsequent codification of the regulations, the ADF&G also included the legal sale of black bear meat, even though the BoG never discussed or approved of it. The legal sale of black bear meat is still on the books to this day despite multiple appeals to address the illegally adopted regulation at subsequent BoG meetings.

² Sections 3, 15, & 17 of the Alaska Constitution / <http://legis.alaska.gov/readdoc?services/alaskaconstitution.html>

³ In 2010, the BoG authorized commercial black bear hunting guides the right to have up to 10 bait stations, while the resident of Alaska is restricted to only less than half of that. This is just one of many abuses to the Alaska Constitution currently being supported by the Board.

Alaska Constitution Sec 3 “Common Use” states: “Wherever occurring in their natural state, fish, wildlife, and waters are reserved to the people for common use.”

This section enshrines in the Alaska Constitution the common law doctrine that natural resources must be managed by the state as a public trust for the benefit of the people as a whole, rather than for the benefit of the government or of specific individuals – specifically the profit driven commercial guiding industry.



interest groups trump long term conservation strategies for the next generation of not only Alaskan's, but all American citizens.

Alaska's most unique asset, its intact ecosystems are being frivolously and callously tossed aside for a game farm policy that promotes nothing more than the harvest of wildlife for financial gain.

Alaskan's are once again at the same gates of corporate hell that we stood at when statehood was first fought for and won. Politics has no memory.

With that in mind, I challenge the Board to consider our States founding constitutional principles and our Master Memorandums of Understanding with various federal land managers as you deliberate the monopolistic and unscientific proposals the Science Now Project is commenting on below.

Wade Willis
Executive Director
Science Now Project
sciencenowproject@gmail.com

Proposal 44: Modify ADF&G Discretionary Authority for Governor's Tags

OPPOSE

Reason: This proposal is a blatant attempt to promote privileged access to harvest wildlife in Alaska for the wealthy sponsors of pro hunting organizations that make up the political caucus that has hijacked the process in Alaska. If this proposal passes, the rich be allowed to pay for special access to Alaska big game resources, access denied to the residents of this state under the hunting regulations.

Currently the Director of the Division of Wildlife Conservation (DWC) is authorized to award "Governors Tags" to any applicant that meets the legislative criteria based on his personal preference. If more than one organization or group applies, the director has administrative authority to decide who receives the tag. Indeed, once Cori Rossi, the former statewide spokesman for Sportsmen for Habitat (SFH), and founding member of Sportsmen for Fish and Wildlife (SFW), was appointed to the position of director of the DWC, he immediately paid his political "debts" by awarding four of the eleven Governor's tags to SFW /SFH for the 2012 big game hunting season.⁴

This politically driven proposal, submitted by the ADF&G, would authorize the Director to allow any methods or means (including use of helicopters or same day airborne harvest), any season date

⁴ ADF&G Governor Tag Winner List: http://www.adfg.alaska.gov/state/decuse.html#decuse_pdt_2012_winner.pdf

See Also: A Disaster for Alaska's Department of Fish and Game / <http://www.themudflats.net/2011/11/16/a-disaster-for-alaskas-department-of-fish-and-game/>



(including authorizing Dall sheep hunts when the residents are not allowed to hunt), or allow harvest statewide (while residents are required to abide by regulations defined by game management unit).

The most astonishing aspect of this proposal is that the department justifies such “exclusive” tags to the rich to increase the financial incentive for the wealthy to pay more for the “special” tag. In reality, the ADF&G use these very funds to send ADF&G staff (up to four at a time) to places like Reno or Las Vegas to attend the conventions of these political caucus groups like SFW / SFH and Safari Club International receiving these Governors Tags. These tags are used as a constituent and membership building strategy for this special interest caucus with their strategy being “join us for special privileges to harvest game in Alaska”.

The department attends these conventions at the request of these radical groups which consumes the very funds paid for the current Director of the DWC claims are going to fund wildlife management projects. It’s a smoke screen.

Everything about this proposal is a lie and represents the most blatant attempt of the political appointees to the ADF&G to ignore Alaska’s Constitution.

Proposal 14, 18, 19, 35 & 36: Set Amount Needed for the Subsistence Needs of Alaska Residents

SUPPORT

Reason: It is required by law.

AS 16.05.258 (b) states:

“The appropriate board shall determine whether a portion of a fish stock or game population identified under (a) of this section can be harvested consistent with sustained yield. If a portion of a stock or population can be harvested consistent with sustained yield, the board **shall determine the amount of the harvestable portion that is reasonably necessary for subsistence uses**” (emphasis added)

The Board has abused this legal requirement for well over 20 years.

At the previous three Board meetings in 2011, the Science Now Project has petitioned the board to address this legal requirement.

In response, the Board has preferred to continue to abuse the legally binding statutes and intent of the Alaska constitution to set the Amount Needed for Subsistence (ANS) findings based on documented historical harvest rates of **all Alaskans**.



In each of the three previous meetings the Board has refused to recognize that 100% of all furbearer harvest, excluding areas the Board has a non subsistence finding, **must be considered as subsistence take** in the review of historical subsistence need for setting an ANS finding.⁵

In addition, the Board must include the historical subsistence harvest trapping harvest rates of urban residents. Alaska's constitution requires it in the equal access clauses (Alaska Constitution, art. VIII, sec. 3, 15 & 17) and the Alaska supreme court has upheld this determination in *McDowell vs. State*, 785 P. 2D 1 (Alaska 1989) which states:

"A requirement that one must reside in a rural area in order to participate in subsistence hunting and fishing, violates the Alaska Constitution, art. VIII, sec. 3, 15 & 17."

Of course, the DOL is fully cognizant of this fact. Yet the DOL has sat quietly as the Board has ignored its legal mandate for well over 20 to protect Alaska's subsistence resources for Alaskan's. The DOL has simply shrugged its collective shoulders as the Board lost multiple legal challenges regarding its abuse of the equal access clauses.

The Science Now Project assures the Board, if the historical harvest of all Alaskan's in areas of the state deemed necessary for subsistence take is not accounted for at this meeting, this Board will find itself back in court. Stop wasting the public's time and the ADF&G subsistence division resources by ignoring staff testimony⁶ and your constitutional and regulatory mandates.

All too often the Board likes to criticize the litigious actions of the public. This is a perfect example of how the Board leaves the public no choice. This Board's blind allegiance to ignore and marginalize the rights of Alaskan's to protect and conserve its subsistence resources will not be tolerated.

If Governor Parnell, and his administration, in particular the Lt. Governor, lacks the ability to ensure that the Board of Game conducts itself in a manner that adheres to state law, then his administration shall be at the mercy of the people's court in the next election.

⁵ Historical Amount Needed for Subsistence findings for furbearer harvest under a trapping license is 100% of the estimated harvestable surplus. The Board cannot find that any historical harvest under a trapping license by ANY Alaskan is not a subsistence take.

⁶ ADF&G Testimony / Proposal 13: On November 14, 2011, ADF&G Subsistence Division staff testified before the Board that 100% of resident harvest of furbearers must be considered as subsistence take when making a determination of ANS.



ADF&G "GAG" Order on Science

Political Appointments to the ADF&G Commissioners Office - a first since statehood:

- Cori Rossi and Pat Valkenburg: December 2009
- GAG Order Policy Issued: May 7, 2010

PURPOSE

The purpose of this policy is to establish guidance for Alaska Department of Fish & Game (ADF&G) employee participation in external reviews and membership on external panels and planning teams.

DISTRIBUTION:

Posted on the Administrative Information Center at the following web address:
<http://csadmin.adfg.state.ak.us/> (Note: Website Address is No Longer Valid)

ISSUE:

Alaska Department of Fish and Game employees are often requested to perform reviews of external documents or to serve on external panels or planning teams. Examples range widely from requests to perform blind reviews of journal articles to public reviews of proposed federal rule makings, or from participation on external panels such as Endangered Species Act (ESA) recovery teams to membership on any number of external planning processes.

In some cases, these requests come directly to employees, while in other cases they come to an employee's supervisor or to ADF&G headquarters. The requests also come under differing terms of reference; in some cases, the requests are made for "independent" reviews while in other cases they are for employees to participate as representatives of ADF&G or the state. In the past, there has been considerable variation in guidance given to employees by their supervisors regarding the employee's participation in these activities. There has also been some disparity in how employees engage in these activities, ranging from participation on state time, using state resources, using their state affiliation, and transmitting opinions on state letterhead to not using agency affiliation or state resources at all.

There are clear benefits to having ADF&G employees involved in many types of external reviews and planning processes. Often requests are made because of the employee's expertise and knowledge gained as a result of their employment with ADF&G, or because of the particular staff position that the employee holds in the department. The expertise of our employees is a valuable asset that should be used to inform and improve fish and wildlife resource decision making processes. To assure consistency in employee participation in such activities, it is necessary to establish clear and reasonable policy and guidance.

POLICY & GUIDANCE

These standards are not meant to hinder open internal debate over the development of departmental positions and policies; there is substantial value in such deliberative discussions. However, once a department position or policy is established, employees must present or adhere to such a position or policy when representing ADF&G, whether directly or through use of its affiliation or resources.



ADF&G Sanctioned External Review or Participation on External Panels

If an employee is requested to perform an external review or to participate on an external planning group or panel utilizing their department affiliation, the employee must inform their supervisor of the request. The supervisor should forward the request to the division director's office for consideration and approval. Requests involving controversial or complex topics should also be forwarded by the director's office to the commissioner's office for consideration.

A determination will be made by the division director's or commissioner's office as to which staff, if any, should conduct the review or participate on the external panel. As with other work products, any document or position statement is subject to review by the appropriate supervisory chain before release. Recommendations or positions to be provided to external panels may also be subject to supervisory review and approval.

Personal External Review

Sometimes staff may be requested to perform a review in their personal capacity and not as a representative of ADF&G. Employees have the right to participate in activities of their choosing and to express their personal views as a private citizen so long as they do not assert or imply that they speaking or acting as an official representative of ADF&G. Further, the activity must not violate personnel rules or other law, such as the Executive Branch Ethics Act bar on outside employment or services that are incompatible or in conflict with the proper discharge of official duties.

When an employee engages in a personal external review, the review activity must take place outside of working hours or when the employee is in personal/annual leave status. The employee may not use state time or resources for the activity. No product should be produced under ADF&G letterhead and the product must not state or infer that it is sanctioned by the department or that it represents the view of the department. It is important not to confuse the public or to jeopardize the employee's credibility and job effectiveness. Employees must not purport, and must be careful not to imply, that their personal views are held by the department.

Employees should consult with their work supervisor regarding the request and with their ethics supervisor regarding any disclosure of outside activities that may need to be submitted.

Employees should also understand that their personal positions may not be supported by ADF&G.

Personal Participation on External Panels

There may be cases where employees elect to participate on panels independent of the department. As stated with respect to personal external reviews above, employees have the right to act as private citizens and to express their personal views.

Any participation on an external panel must take place outside of working hours or when the employee is in personal/annual leave status; participation must be clearly segregated from duties and responsibilities that the employee has with the department. It is important not to confuse the public or jeopardize the employee's credibility and job effectiveness. Employees must not purport, or appear to imply, that their personal views are held by the department. It is the responsibility of the employee to make clear that any personal positions articulated are neither those of the department nor that they represent the views of the department.



Employees should consult with their work supervisor regarding personal participation on an external panel and with their ethics supervisor regarding any disclosure of outside activities that may need to be submitted.

Employees should also understand that their personal positions may not be supported by the department.





December 30, 2011

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

To Whomever:

Attached is Ahtna Tene Nene' Customary & Traditional Use Committee's written comments on the Alaska Board of Game 2011-2012 Statewide wildlife proposals.

Sincerely,

Gloria Stickwan

Gloria Stickwan,
Customary & Traditional Use &
Environmental Coordinator

Statewide 2012 Wildlife Proposals

Falconry, Other Permits

Proposal 38 5 AAC 92. 037. Permits for falconry. Modify the falconry regulations and the Alaska Falconry Manual to meet federal standards for certification by USF&WS as follows: By Alaska Falconers Association.

Comments:

We oppose Propose 38 and support Proposal 39.

Proposal 39 5 AAC 92. 037. Permits for falconry. This proposal changes state falconry regulations to comply with new federal falconry standards, eliminates a joint federal-state permit requirement and replaces it with a state-only permit and makes other adjustments regarding take, import/export, facilities and other aspects of falconry. By Alaska Department of Fish & Game.

Comments:

We support Proposal 39 to make federal and state falconry standards the same, eliminating joint federal-state permit requirement and change other parts of the regulation, such as requiring Alaska State hunting license, adding to list of birds, etc.

Proposal 40 5 AAC 92. 037. Permits for falconry. Allow nonresidents falconers to capture raptors. By American Falconry Conservancy.

Comments:

We oppose Proposal 40 to allow nonresidents falconers to capture 3 gyrafalcons, 3 Peule's peregrines, 2 anatum peregrines, 2 tundra peregrines, 3 merlins, 3 goshawks, 3 red-tailed hawks and 3 sharp-shinned hawks in the State of Alaska. We do appreciate written in Proposal 40 that Native Tribal lands were off limits to raptors capturing unless authorized by Native Corporation.

Proposal 41 5 AAC 92.034. Permit to take game for cultural purposes. By the Alaska Department of Fish and Game. Review the intended scope of this permit and amend as needed.

Comments:

We oppose Proposal 41 to take game for corporation meetings either in or outside of Alaska. The purpose of the cultural permit is to teach the younger generation at cultural camps to learn fishing and hunting skills, Native culture, values, customary and traditional uses of fish and wild game.

If wild game and fish is on the menu at corporation meetings in Alaska, corporations should he make provisions for it. We oppose fish and wild game being provided for under a cultural permit for corporation meetings outside of the State of Alaska. The cultural permit regulation was not intended to be on used for food at corporation meetings.



Proposal 42 5 AAC 92.033 Permit for scientific, educational, propagative, or public safety purposes. By Alaska Department of Fish and Game. Modify the current department authority for issuing public safety permits.

Comments:

We support Proposal 42 to have the Department change and update 5 AAC 92.033, Permit for scientific, educational, propagative, or public safety purposes. This will clarify and add language to the regulation to make it easier to read and understand and add necessary additions.

Proposal 43 5 AAC 92.041. Permit to take beavers to control damage to property. By Patricia O'Brien. Review and modify nuisance beaver permits to allow beaver flow devices.

Comments:

We oppose Proposal 43 to "Review and modify nuisance beaver permits to allow beaver flow devices". Joint Boards do not need to meet to discuss 5 AAC 92.041. We agree beavers are productive and protect the environment.

Proposal 44 5 AAC 92.052. Discretionary permit hunt conditions and procedures. By Alaska Department of Fish and Game. Add a new discretionary authority that would allow the department to define specific seasons and methods and means of hunting for recipients of Governor's tags.

Comments:

We oppose Proposal 44 to allow the Department to define specific seasons and methods and means of hunting for recipients of Governor's tags. Regular hunting seasons are on the books and allow for quality hunting methods and means. Recipients should not have seasons open outside of regular hunting season or have different methods and means allotted to them. Furthermore, Governor's tags should not be given to organizations, as recommended by the Department Heads. A governor's tag was recently given to an organization that currently has a lawsuit against the State of Alaska. The system should be done away with or at a minimum be open to all organizations in the State of Alaska.

Sale of Big Game and Big Game Trophies

Proposal 45 5 AAC 92.200. Purchase and sale of game. By Alaska Department of Fish and Game. Align state regulations on subsistence bartering with statutory authority.

Comments:

We support Proposal 45 to align state regulations on subsistence bartering with statutory authority, so that subsistence users will be in compliance with regulations, and will not inadvertently break laws.



Many residents will be able to barter wild game in a limited noncommercial way. Exchanging meat for store brought foods or other wild game foods could be legally done, if this regulation were passed by the Alaska Board of Game.

Proposal 46 5 AAC 92.200. Purchase and sale of game. By Fairbanks Advisory Committee. Allow the sale of big game trophies.

Comment:

We oppose Proposal 46 to allow the sale of big game trophies. We do not sell any part of caribou or moose. It is not customary and traditional to sell meat or parts of caribou and moose. Selling of trophy big game will encourage the public to hunt just for the trophy of wild game.

Proposal 47 5 AAC 92.200. Purchase and sale of game. Allow the sale of trophies acquired through legal action such as divorce. By Mary Jane Sutliff.

Comments:

See comments under Proposal 46.

Proposal 48 5 AAC 92.200. Purchase and sale of game. By Jim Stratton, National Parks Conservation Association. Prohibit the sale of bear parts harvested on National Park lands.

Comments:

No comments on Proposal 48.

Proposal 49 5 AAC 92. XXX. Provide authority to the Alaska Wildlife Troopers to inspect taxidermy businesses. By Alaska Wildlife Troopers.

Comments:

No comments on Proposal 49.

Discretionary Permit Conditions

Proposal 50 5 AAC 92.052. Discretionary permit hunt conditions and procedures. Review and potentially repeal discretionary hunt conditions and procedures applied to permit hunts across the state. By the Board of Game.

Comments:

We support Proposal 50 to remove number (22) "a permittee may transfer the permittee's Unit 13 subsistence permit to a resident member of the permittee's family, within the second degree of kinship; a person may not receive remuneration for the transfer of a permit under this paragraph". This regulation refers to a Tier II subsistence permit. Unit 13 does not have a Tier II hunting season. This regulation is confusing for the public and it should be removed from the regulations.



Proposal 51 5 AAC 92.052. Discretionary permit hunt conditions and procedures. By Alaska Department of Fish & Game. Allow the Department of Fish and Game to require the latitude and longitude of kill locations on a harvest report for drawing and registration hunts.

Comments:

We oppose Proposal 51. For people who draw permits or have Tier I permits, some people do not do not have the knowledge of how to read a map. It will also pinpoint where people hunt.

Proposal 52 5 AAC 92.052. Discretionary permit hunt conditions and procedures. By Alaska Department of Fish & Game. Clarifies department discretionary authority to require antler locking tags for certain permit hunts.

Comments:

We oppose Proposal 52 with modification to "require antler locking tags for drawing permit hunts and other State hunts". It would be burdensome to the hunters.

Archery, Crossbow Regulation

Proposal 53 5 AAC92.085. Unlawful methods and of taking big game; exceptions. Establish statewide standards for crossbow equipment used to take big game. By Alaska Department of Fish & Game.

Comments:

We oppose Proposal 53. We oppose any archery or crossbow hunts, especially, in Unit 11, Unit 12, and Unit 13.

Proposal 54 5 AAC 92.052. Discretionary permit hunt conditions and procedures. By Roggie Hunter. Expand the definition of bow to include crossbows.

Comments:

See comments under Proposal 53.

Proposal 55 5 AAC 92.990 Definitions. By John Frost. Create a regulatory definition for crossbow.

Comments:

See comments under Proposal 53.

Proposal 56 5 AAC 92.085. Unlawful methods of taking big game; exceptions. By Fairhanks Advisory Committee. Adopt crossbow standards and allow disabled hunters to use crossbows in archery hunts.

Comments:

See comments under Proposal 53.



Proposal 57 5 AAC 92.085. Unlawful methods of taking big game; exceptions. By Bob Ermold. Allow archers to use mechanical/retractable broadheads for all big game.

Comments:

See comments under Proposal 53.

Proposal 58 5 AAC 92.085. Unlawful methods of taking big game; exceptions. By Terry Marquette. Allow archers to use mechanical/retractable broadheads for all big game.

Comments:

See comments under Proposal 53.

Proposal 59 5 AAC 92.085. Unlawful methods of taking big game; exceptions. By Virgil Unphenour. Require the use of a lighted mock on the arrow for moose and bear hunting.

Comments:

See comments under Proposal 53.

Proposal 60 5 AAC 92.085. Unlawful methods of taking big game; exceptions. By Marvin Park. Clarify legal type of compound bow.

Comments:

See comments under Proposal 53.

Proposal 61 5 AAC 92.085. Unlawful methods of taking big game; exceptions. By Marvin Park. Modify the requirement for legal bow.

Comments:

See comments under Proposal 53.

Permits, Permit Allocations

Proposal 62 5 AAC 92.050. Required permit hunt conditions and procedures. By Valerie Baxter. Restrict the number of drawing permits a resident may apply for.

Comments:

No comments on Proposal 62, with the exception, that the regulation states that "a person may not apply for 3 different drawing permits for the same species".

Proposal 63 5 AAC 92.050. Required permit hunt conditions and procedures. By Alaska Department of Fish & Game. Increase the number of drawing permits for each species that a person may apply for:



Comments:

No comments on Proposal 63. Most of the Ahtna do not apply for drawing permits; we hunt under the Ahtna Tene Nenc' Customary & Traditional Use Copper Basin Subsistence Harvest Permit program hunt.

Proposal 64 5 AAC 92.050. Required permit hunt conditions and procedures. By Mark Masteller. Limit drawing permits to only two permits per year.

Comments:

See comments under Proposal 63.

Proposal 65 5 AAC92.049. Permits, permit procedures, and permit conditions; and 92.050. Required permit hunt conditions and procedures. Limit drawing permit winners to only two permits per year.

Comments:

See comments under Proposal 63.

Proposal 66 5 AAC 92.050. Required permit hunt conditions and procedures. By Paul Ferucci. Allow a maximum of 10 percent for the Alaska drawing permits to be awarded to nonresident hunters.

Comments:

See comments under Proposal 63.

Proposal 67 5 AAC 92.050. Required permit hunt conditions and procedures. By Mark Albert. Limit drawing permits to 10 percent for nonresidents permits if less than 10 permits available.

Comments:

See comments under Proposal 63.

Proposal 68 5 AAC, Chapter 85, Hunting Seasons and Bag Limits. By Vern Fiehler. Allow a maximum of 10 percent for the Alaska drawing permits to be awarded to nonresident hunters.

Comments:

See comments under Proposal 63.

Proposal 69 5 AAC 92.050. Required permit hunt conditions and procedures. By Eivind Brendtro. Establish bonus point/preference system for draw hunts.

Comments:

See comments under Proposal 63

Proposal 70 5 AAC 92.050. Required permit hunt conditions and procedures. By Lance Kronberger. Allow nonresident deployed military personnel to defer drawing permit.



Comments:

We support Proposal 70. If nonresident military personnel is awarded a drawing permit and is deployed, he/she should be able to defer the drawing permit to the following year. Military personnel who defend our country should be able to hunt via a deferred permit.

Statewide Big Game Seasons

Proposal 71 5 AAC Chapter 85. Seasons and bag limits. By Larry Dalrymple. Open resident season one week before nonresident seasons in all intensive management areas.

Comments:

We oppose Proposal 71. Unit 13 is an IM area and is an impacted statewide hunting area, allowing a longer statewide hunting season will only increase hunting pressure. Opening season one week earlier will not alleviate pressure or competition of hunting.

Proposal 72 5 AAC Chapter 85. Seasons and bag limits. By Terry Marquette. Open big game general seasons seven days earlier for residents, five day earlier in drawing hunts.

Comments:

We oppose Proposal 71. See comments under Proposal 71.

Proposal 73 5 AAC Chapter 85. Seasons and bag limit. By Vern Fiehler. Open all big game seasons one week earlier for residents than nonresidents.

Comments:

We oppose Proposal 73. See comments under Proposal 71.

Proposal 74 5 AAC Chapter 85. Seasons and bag limit. By Marty Laudert. Open all big game seasons one week earlier for residents than nonresidents.

Comments:

We oppose Proposal 74. See comments under Proposal 71.

Proposal 75 5 AAC Chapter 85. Seasons and bag limit. By Steve Hallsten. Open early youth hunt for all big game; ten days before other seasons; require hunter education.

Comments:

We oppose Proposal 75. See comments under Proposal 71.

Proposal 76 5 AAC Chapter 85. Seasons and bag limit. By Michael Dullen. Open early youth hunt (10-17 years) for all big game statewide and required accompanying adult to forfeit bag limit.

Comments:

We oppose Proposal 76. See comments under Proposal 71.



Proposal 77 5 AAC 92.051. Discretionary trapping permit conditions and procedures. Require hunters to use only one type of method; either firearm or bow; require a tag.

Comments:

We oppose Proposal 77. We do not support archery hunts, especially in Unit 12 and Unit 13. They wouldn't be able to shoot a wounded animal.

Statewide Sheep Seasons & Permit Allocations

Proposal 78 5 AAC85.055. Hunting seasons and bag limits for Dall Sheep. By Wayne Valcq. Open resident sheep seasons seven days earlier than nonresident seasons.

Comments:

No comment on Proposal 78.

Proposal 79 5 AAC85.055. Hunting seasons and bag limits for Dall Sheep. By Wayne Valcq. Open resident sheep seasons seven days earlier than nonresident seasons.

Comments:

No comments on Proposal 79.

Proposal 80 5 AAC85.055. Hunting seasons and bag limits for Dall Sheep. By Wayne Valcq. Change the nonresident season and amount of permits available.

Comments:

No comments on Proposal 80

Proposal 81 5 AAC85.055. Hunting seasons and bag limits for Dall Sheep. By Ethan Graham. Open resident seasons one week before nonresident seasons for Dall sheep hunting.

Comments:

No comments on Proposal 81.

Proposal 82 5 AAC85.055. Hunting seasons and bag limits for Dall Sheep. By Jake Sprinkle and James Von Hole. Begin the hunting season for Dall sheep seven days earlier than nonresidents.

Comments:

No comments on Proposal 82.

Proposal 83 5 AAC85.055. Hunting seasons and bag limits for Dall Sheep. By Sharon Swisher. Begin the resident sheep seasons ten day earlier than nonresident seasons.



Comments:

No comments on Proposal 83.

Proposal 84 5 AAC85.055. Hunting seasons and bag limits for Dall Sheep. By Leonard Jewkes. Open resident sheep seasons five days before earlier than nonresident seasons.

Comments:

No comments on Proposal 84.

Proposal 85 5 AAC85.055. Hunting seasons and bag limits for Dall Sheep. By Ray Huer. Begin resident Dall sheep seasons five days earlier.

Comments:

No comments of Proposal 85.

Proposal 86 5 AAC85.055. Hunting seasons and bag limits for Dall Sheep. By Jake Sprankle. Begin the youth hunting season for Dall sheep five days earlier than residents.

Comments:

No comments on Proposal 86.

Proposal 87 5 AAC85.055. Hunting seasons and bag limits for Dall Sheep. By James Von Holle.

Convert all nonresident sheep seasons to drawing permit hunts and limit to five percent of total permits.

Comments:

No comments on Proposal 87.

Proposal 88 5 AAC Chapter 85. Seasons and bag limits. By Tyler Freel. Convert all nonresident sheep seasons to draw permits and limit to 10 percent of total permits.

Comments:

No comments on Proposal 88.

Proposal 89 5 AAC85.055. Hunting seasons and bag limits for Dall Sheep. By Dour Lammers. Convert all sheep hunts to drawing only, 90% for residents.

Comments:

No comments on Proposal 89.

Proposal 90 5 AAC85.055. Hunting seasons and bag limits for Dall Sheep. By Ray Huer. Allocate two percent of all sheep drawing permits to nonresidents, close nonresidents season if harvestable surplus is less than 50.



Comments:

No comments on Proposal 90.

Proposal 91 5 AAC85.055. Hunting seasons and bag limits for Dall Sheep. By Lance Kronberger. Nonresident next of kin sheep tags come out of the resident pool in Units where there are a limited number of nonresident sheep tags.

Comments:

No comments on Proposal 91.

Proposal 92 5AAC 92.095. Unlawful methods of taking furbearers; exceptions. Allow only the use of traps and snares for taking wolf and wolverine and prohibit the use of firearms except for dispatching trapping animals. By Science New Project.

Comments:

We oppose Proposal 92 to "prohibiting the use of firearms except for dispatching trapping animals. If there is an opportunity to shoot a wolf or wolverine while a trapper is in the field, he or she should be able to shoot it. There isn't a population concern with wolves in Alaska. We have abundance in Unit 11 and Unit 13. Wolverine maybe free roaming, however, it is not possible to shoot at one without effort of walking a distance to high country to see a wolverine.

Proposal 93 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions. By Jim Stratton, National Park Conservation Association. Allow only the use of traps and snares for taking wolf and wolverine on National Park Service lands and prohibit the use of firearms except for dispatching trapped animals.

Comments:

We oppose Proposal 93. See cements under Proposal 91.

Proposal 94 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions. By Jim Stratton, National Parks Conservation Association. Prohibit the taking of wolf, fox, wolverine, or coyote during May, June and July on National Park Service Lands.

Comments:

We oppose Proposal 94. Predation on caribou and moose are depleting these wild games in Alaska and in Unit 11. wolves are preying upon calves or caribou and moose. There isn't a conservation concern for wolves in Unit 11 National Park Lands. Fox, coyote and wolverine trapping seasons and bag limits are liberal under Unit 11 NPS lands, there doesn't appear to be conservation concern for these species.

Proposal 96 5 AAC 92.075. Lawful methods of taking game. By Alaska Bowhunters Association. Open areas to archery hunting, if shotguns are allowed.

Comments:

We oppose Proposal 96. We do not support archery hunting.



Methods and Means

Proposal 97 5 AAC 92.080. Unlawful methods of taking game; exceptions; 92.085 Unlawful methods of taking big game; exceptions; 92.090 Unlawful methods of taking fur animals ; 92.095 Unlawful methods of taking furbearers; exceptions. By Jim Stratton, National Parks Conservation Association. Prohibit the use of artificial light for taking game on all lands managed by National Park Service.

Comments:

No comments on Proposal 97. Prohibition of artificial light use to take big game is already in regulation under number (7) of 5 AAC92.080. It is allowed for small game, such as coyotes.

Proposal 98 5 AAC 92.080. Unlawful methods of taking game; exceptions; By Marvin Park. Prohibit the use of hand held electronics in taking game.

Comments:

No comments on Proposal 98. It is already in hunting regulations. "You may not take big game by using an electronic control Taser-type device". The worst devices are already illegal.

Proposal 99 5 AAC 92.085(c)(i). Unlawful methods of taking game; exceptions; By Brian Peterson. Hunters using a licensed transporter cannot harvest on the same day transported.

Comments:

We oppose Proposal 99. It could exclude off road vehicles and boats. Transport by boat or ATV doesn't give an unfair advantage like aircraft.

Proposal 100 5 AAC 92.080. Unlawful methods of taking game; exceptions; By Delta Fish and Game Advisory Committee. Allow the use of laser sight electronically-enhanced night vision scope, or artificial light for taking coyotes.

Comments:

We oppose Proposal 100 to allow the use of laser sight, electronically-enhanced night vision scope to take coyotes from October 1 through June 30. It isn't necessary to use any light during the month of June. Utilizing electronically-enhanced night vision to take coyotes should not be allowed because it would create an unfair advantage.

Proposal 101 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions; and 92.090. Unlawful methods of taking fur animals; exceptions. By Delta Fish and Game Advisory Committee. Allow same day airborne taking of coyotes statewide.

Comments:

We support Proposal 101 of allowing of taking coyotes on the same day that a person is airborne. Coyote population studies haven't been done, but there seems to be more coyotes in Unit13.

Proposal 102 5 AAC 92.085. Unlawful methods of taking big game; exceptions. Prohibit the use of pack animals other than horses while hunting sheep or goat. By Daniel Montgomery.



Comments:

We support Proposal 102 with an amendment to dis-allow the use pack domestic sheep and goats.

Proposal 103 5 AAC 92.080. Unlawful methods of taking game; exceptions. By Alaska Department of Fish & Game. Prohibit the use of felt soled wading boots while hunting game.

Comments:

We support Proposal 103 to “prohibit the use of felt soled wading boots while hunting game”. Invasive species are spreading in Alaska, and are negatively affecting streams and lakes. Drying up of lakes will affect moose habitat.

Proposal 104 5 AAC 92.080. Unlawful methods of taking game; exceptions. By Alaska Department of Fish & Game. Prohibit the use of deer or elk urine for use in taking game.

Comments:

We support Proposal 104 to dis-allow use of deer or elk urine in taking game. Chronic Wasting Disease will be passed on to caribou and moose. It isn't a good method to take game. It is unnatural way of taking game.

Proposal 105 5 AAC 92.130. Restrictions to bag limit. By Alaskan Bowhunters Association. Clarify the definition of wounded as it applies to the restrictions to bag limits: Statewide, for any animal in which the Board of Game believes that a wounded animal should count against the bag limit for that species, simply insert the word MORTALLY in front of wounded in the regulation. So the new regulation would read **“any animal mortally wounded and not recovered must count against the bag limit”**.

Comments:

We oppose Proposal 105. Bowhunters are more likely to wound animals than hunters who use firearms. If they “superficially wound an animal it must be counted against their bag limit. A lot of abuse will occur and wild game will be wasted if animals are wounded and left in the field by bow hunters.

Proposal 106 5 AAC 92.130. Restrictions to bag limit. By Michelle Nifand. Count wounded muskox, bison, sheep and goat that are not recovered as the bag limit.

Comments:

We support Proposal 105 to count wounded muskox, bison, sheep and goat that are not recovered as the bag limit. Any wounded animal should count against a bag limit. Waste of wild game will take place if wounded animals are not counted against the bag limit.

Proposal 107 5 AAC 85.015. Hunting seasons and bag limits for black bear. By Steve Flory. Eliminate the statewide bag limit for black bear.



Comments:

No comments on Proposal 107.

Proposal 108 5 AAC 92.260. Taking cub bears and female bears with cubs prohibited. By Jim Stratton, National Park Conservation Association. Prohibit the harvest of cubs and sows accompanied by cubs on National Park Service (NPS) lands:

5 AAC 92.260 Taking cub bears and female bears with cubs prohibited

on lands managed by the National Park Service, a person may not take an adult dependent bear cub or a female bear accompanied by an adult dependent bear cub.

Comments:

No comments on Proposal 108.

Proposal 110 5 AAC 92.150 Evidence of sex and identity. By The Greater Alaska Black Bear Committee. Require the hunter to keep sex attached to the meat if it (the skull) needs to be sealed.

(d) In those areas where sealing is required, until the hide or skull has been sealed by a representative of the department, no person may possess or transport the **un-tanned** hide of a bear **taken in that area; or the meat of a bear taken in that area at times when only meat salvage is required;** that does not have the penis sheath or vaginal orifice naturally attached **to the hide or sufficient portions of the external sex organs remain attached to the meat** to indicate conclusively to the sex of the bear.

Comments:

No comments on Proposal 110.

Proposal 111 5 AAC 92.150. Evidence of sex and identity. Clarify the sex organs, or portions of, that must remain attached for proof of sex.

(b) If the taking of a bag game animal, except sheep, is restricted to one sex, a person may not possess or transport the carcass of an animal unless sufficient portions of the external sex organs remain attached to indicate conclusively the sex of the animal **(the penis sheath need not remain attached, but a testicle or the penis or the vulva must remain naturally attached)**, except that antlers are considered proof of sex for a deer if the antlers are naturally attached to an entire carcass, with or without the viscera; however, this section does not apply to the carcass of a big game animal that has been cut and placed in storage or otherwise prepared for consumption upon arrival at the location where it is to be consumed.

Comments:

We oppose Proposal 111. It is not customary and traditional to utilize sex organs. If enforcement inspects moose while in the field, antlers are sufficient proof of evidence. We oppose having to comply with this regulation, because it is burdensome to hunters and isn't necessary.

Proposal 112 5 AAC 92.150. Evidence of sex and identity. By John Frost. Eliminate the evidence of sex regulation.



Comments:

We support Proposal 112 to “eliminate the evidence of sex regulation”, but not to have the individual cover the cost of DNA evidence tests, which will be too expensive for the Ahtna people to pay for. The antlers for Bull Moose should be enough proof.

Proposal 113 5 AAC 92. 135. Transfer of possession. By Fairbanks Advisory Committee. Remove the reference to federal fish and wildlife agent under the transfer and possession regulation.

(c) A person giving, shipping, or receiving game or parts of game shall allow inspection of that game or parts of game upon request from a peace officer of the state [OR FEDERAL FISH AND WILDLIFE AGENT].

Comments

We are neutral on Proposal 113, which means we do not support or support Proposal 113.

Black Bear Baiting

Proposal 114 5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures. By Joe Schuster. Allow black bear to be taken same-day airborne within ¼ mile of bait station.

Comments:

No comments on Proposal 114.

Proposal 115 5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures. By Joe Schuster.

5 AAC 92.044(6) a person may not give or receive remuneration for the use of a bait station, including barter or exchange of good; however, this paragraph does not apply to a registered guide-outfitter, class-A assistant guide, or assistant guide, or assistant guide [WHICH PERSONALLY ACCOMPANIES A CLIENT] **if a signed guide-client agreement is used for each hunter that uses a site.**

Comments:

No comments on Proposal 115.

Proposal 116 5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures. By Smokey Don Duncan. In addition to the 10 bait sites in total, guides and assistant guides may also have two personal sites each; and assistant guides may hunt all sites for personal use without guide-client agreements.

A registered guide-outfitter may register 10 bait sites at the same time and the assistant guides may help place and maintain those 10 baits **in addition to the two baits each they may register for personal or business use. The guide or assistant guides may/or may not hunt the 10**



baits personally or with friends without a guide client agreement. (Take your pick but make it clear).

Comments:

No comments on Proposal 116.

Proposal 117 5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures. By Smoky Don Duncan. Remove the requirement for guides to personally accompany resident client at a black bear stations.

Comments:

No comments on Proposal 117.

Proposal 118 5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures. By The Greater Alaska Black Bear Committee.

Comments:

No comments on Proposal 118.

Proposal 119 5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures. By The Greater Alaska Black Bear Committee. Establish a codified location for permitted black bear bait stations and establish seasons for all of Alaska.

Comments:

No comments on Proposal 119.

Proposal 120 5 AAC 92.115 Control of predation by bears. Eliminate black bear baiting as a method requiring a predator control permit in predator control areas. By the Greater Alaska Black Bear Committee.

Comments:

No comments on Proposal 120.

Proposal 121 5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures. By Jim Stratton, National Park Conservation Association, Prohibit black bear baiting on all National Park Service Lands.

We oppose Proposal 121 to "eliminating black bear baiting on NPS Lands". Black bear baiting on National Park Service Lands helps with reducing the population of predators preying upon calves of moose and caribou. In Unit 11, black bears population is not a conservation concern, but calves of moose and caribou are a concern. Wolves and black bears have decimated the caribou population in Unit 11.

Proposal 122 5 AAC 92.085. Unlawful methods of taking bag game; exceptions. Fairbanks Advisory Committee. Allow the use of scent lures for black bear while floating.



Comments:

No comments on Proposal 122.

Proposal 123 5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures.by Roggie Hunter. Allow the use of scent lures for black bear baiting while floating.

Comments:

No comment on Proposal 123.

Trapping

Proposal 124 5AAC 92.095. Unlawful methods of taking furbearers: exceptions. By Jim Stratton, National Park Conservation Association. Require trap identification of all Units on lands managed by the National Park Service.

Comments:

We oppose Proposal 124 to “require trap identification of all Units on lands managed by National Park Service”. Trapper should not have to identify themselves by metal tags or sign. It is unnecessary and burdensome to trapper to do this. Additionally, posting personal license numbers or State ID could cause problems with identity theft, displaying these numbers for the public to see.

Proposal 125 5AAC 92.095. Unlawful methods of taking furbearers; exceptions. By Jim Stratton, National Park Conservation Association. Require a 72 hour trap check for all traps and snares on National Park Service lands.

Comments:

We oppose Proposal 124 to require trappers to check snares and traps in 72 hours. Trappers should not be burdened with more regulations than necessary. Trappers would be confused whether they are trapping on federal or state public lands, and what traps to check in 72 hours. Checking traps should be a decision left up to trappers, not NPS management.

Proposal 126 5AAC 92.095. Unlawful methods of taking furbearers; exceptions. Prohibit the trapping of black bears in all National Park Service managed lands. By Jim Stratton, National Park Conservation Association.

Comments:

We oppose Proposal 127 to dis-allow trapping of black bears on all National Park Lands for the same reasons mentioned in Proposal 121.

Proposal 127 5AAC 92.095. Unlawful methods of taking furbearers; exceptions. By Alaskans for the Environment. Prohibit the taking of black bear by trap or snare.

Comments:

See comments under Proposal 121.



Proposal 128 5 AAC 92.051. Discretionary trapping permit conditions and procedures. By Paxson Fish and Game Advisory Committee. Establish a tag and fee to allow trappers to retain incidental catch.

Comments:

We oppose Proposal 128 to make it mandatory to have trappers purchase a tag and fee for incidental catch. Trappers should not have to purchase additional tags or have fees imposed upon them. Incidental catch happens and it is not the fault of trappers, and they should not be cited.

Intensive Management

Proposal 129 5 AAC 92.001 Applications of this chapter. 92.110. Control of predation by wolves. 92.115. Control of bears. By Alaska Department of Fish & Game. Clarify responsibilities of Department of Fish and Game commissioner.

Comments:

We support Proposal 119 to clarify control of bears and wolves regulation so the Commissioner will have clear authority to take wolves and bears without ABOG's approval and action on intensive management.

Miscellaneous

Proposal 132 5 AAC 92.005. Policy for changing board agenda. By Alaska Department of Fish and Game. Modify the Agenda Change Request policy.

Comments:

We support Proposal 132 with an amendment to have changes prior to first ABOG meeting, so that the Board will have more time to process and act on ACRs, comply with public process notification, have more time to work with federal agencies, and additional words as written in the proposal.

Proposal 245 5 AAC 85.045(11). Hunting seasons and bag limits for moose. By Alaska Department of Fish and Game. Re-authorize the drawing permits hunts for antlerless moose in Unit 13.

Comments:

We oppose Proposal 245. This proposal will cause the moose population to crash. Taking cow moose will cause hunters to harvest too many cows and crash the moose population. This happened in the 1970s, when there was an open season for cow moose. Unit 13 is an impacted hunting area, and too many hunters will take advantage of this proposed cow moose hunt. Hunters may take cows that have calves by mistake.



Proposal 255 5 AAC 92.015. Brown bear tag fee exemption. By Alaska Department of Fish and Game. Reauthorize the brown bear tag fees for Region IV.

Comments:

No comments on Proposal 255.



Western Interior Alaska Subsistence Regional Advisory Council
c/o U.S. Fish & Wildlife Service
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503
Phone: (907) 787-3888, Fax: (907) 786-3898
Toll Free: 1-800-478-1456

NOV 09 2011

RAC WI014.MH

Mr. Cliff Judkins, Chairman
Alaska Board of Game
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Mr. Judkins:

The Western Interior Subsistence Regional Advisory Council (Council) met on October 4-5, 2011, in Aniak, Alaska. The Council took public testimony and addressed various subsistence-related management issues and addressed Alaska State Board of Game Proposals 50, 92, 93, 94, 102, 103, and 104.

The Council provided an opportunity for public testimony on these proposals and deliberated and took final action by unanimously opposing Proposals 50, 92, 93, and 94. The Council supports Proposals 102, 103, and 104.

Proposal 50 - Oppose

An integral part of the Koyukuk Moose Management Plan is the requirement to destroy the trophy value of the moose. This proposal promulgated by the Alaska Board of Game, if adopted, could lead to an inundation of thousands of additional hunters and may cause certain hunts to exceed sustainability. The Council opposed the repeal of this discretionary power that has been granted to the Alaska Department of Fish & Game (Department) and feels that it needs to remain in place.

Proposal 92, 93 and 94 - Oppose

These proposals would unnecessarily restrict trappers in rural Alaska who have an opportunity to take a furbearer legally with a firearm; there is no biological rationale for these proposed restrictions.



Proposal 102 - Support

Disease, primarily pneumonia, has caused major (80% to 100% of the total herd in some cases) die-off in wild sheep. These are introduced diseases that are brought by domestic pack goats and llamas.

Proposal 103 - Support

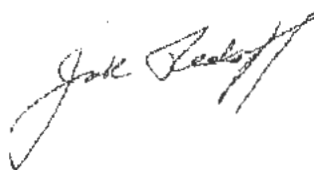
Felt-soled waders have been identified as the primary vector of transferring invasive species such as whirling disease, mud snails, and zebra mussels. Non-resident hunters come to Alaska from areas where these species exist and could transfer these species to local waterways. The introduction of these mussels and pathogens into our environment is a grave concern.

Proposal 104-Support

There is concern of Chronic Wasting Disease being vectored into wild populations within the Western Interior region. This disease would affect moose and caribou if it is extended from Kodiak and other areas of Alaska where ungulate urine is used in hunting. The Council is supportive of this proposal.

Thank you for the opportunity for this Council to assist the Department to meet its charge of protecting the resources and the opportunity to comment on the Department's proposals. We look forward for continuing discussions about the issues and concerns of subsistence users of the Western Interior Region. If you have questions about this correspondence, please contact me via Melinda Hernandez, Regional Council Coordinator, with the Office of Subsistence Management, at 1-800-478-1456 or (907) 786-3885.

Sincerely,



Jack Reakoff, Chair
Western Interior Subsistence
Regional Advisory Council

cc: Peter Probasco, ARD, OSM USFWS
Geoff Haskett, Regional Director, Region 7, USFWS
Federal Subsistence Board Members
Western Interior RAC members





United States Department of the Interior



FISH AND WILDLIFE SERVICE

1011 E. Tudor Road
Anchorage, Alaska 99503-6199

IN REPLY REFER TO:

FWS/OSM11097.CA

DEC 22 2011

Mr. Cliff Judkins, Chair
Alaska Board of Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Judkins:

The Alaska Board of Game (Board) is scheduled to meet January 13-18, 2012, to deliberate proposals concerning changes to Statewide regulations, Cycle "B" schedule. We have reviewed the 90 plus proposals the Board will be considering at this meeting.

The U.S. Fish and Wildlife Service, Office of Subsistence Management, working with other Federal agencies, has developed preliminary recommendations on those proposals that have potential impacts on both Federal subsistence users and wildlife resources. Our comments are enclosed.

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues. Please contact Chuck Ardizzone, Wildlife Liaison, at 907-786-3871, with any questions you may have concerning this material.

Sincerely,

Peter J. Probasco,
Assistant Regional Director

Enclosure

cc: Cora Campbell, ADF&G
Tim Towarak, Chair, FSB
Kristy Tibbles, Board Support Section
Jennifer Yuhas, ADF&G
Interagency Staff Committee
Chuck Ardizzone, OSM

**TAKE PRIDE
IN AMERICA** 



RECOMMENDATIONS

ALASKA BOARD OF GAME PROPOSALS

**Statewide Regulations
Cycle B Schedule
January 13-18, 2012
Anchorage, Alaska**

U.S. Fish and Wildlife Service Office of Subsistence Management (OSM)



PROPOSAL 50 – 5 AAC 92.052. Discretionary permit hunt conditions and procedures. Review and potentially repeal discretionary hunt conditions and procedures applied to permit hunts across the state.

Current Federal Regulations:

Currently there are no regulations requiring the nullification of trophy value in Federal hunting regulations.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal Subsistence users/wildlife: There should be no impact to wildlife. Discretionary authority requiring nullification of trophy value of animals taken under a subsistence permit has been used in a number of game management units to help limit hunters who wish to harvest an animal for its trophy value. Removing this discretionary authority could lead to increased competition as well as user conflicts in several of the areas where nullification of trophy value is required. Federally qualified subsistence users may be impacted if the discretionary authority is removed.

Federal Position/Recommended Action: The OSM recognizes that it is important to review discretionary authorities periodically; however, OSM would be **opposed** to the removal of the discretionary authority to require the nullification of trophy value from the Alaska Department of Fish and Game.

Rationale: The nullification of trophy value of animals taken is a valuable tool allowing managers to limit harvest in areas without initiating alternative hunt management strategies such as Tier II permits or drawing hunts when a wildlife population cannot support harvest from all user groups. Removing this discretionary authority could lead to increased competition as well as user conflicts in several of the areas where nullification of trophy value is required. Additionally, this tool has been used as the foundation of certain management plans (i.e., the Koyukuk River Management Plan) and, if eliminated, could invalidate these joint planning efforts.

PROPOSAL 102 – 5 AAC 92.085. Unlawful methods of taking game; exceptions. Prohibit the use of pack animals other than horses while hunting sheep or goat.

Current Federal Regulations: Currently there are no Federal hunting regulations restricting the use of pack animals while hunting sheep or goat.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal Subsistence users/wildlife: The proponent has provided substantial



evidence regarding the potential impacts to wild sheep and goat populations in Alaska. A recent risk assessment of the transmission of disease from domestic species to Dall's sheep and mountain goats in the Northwest Territories found "that contact between domestic sheep or goats and wild Dall's sheep or mountain goats would likely result in significant disease in the wild species with substantial negative and long term effects on population dynamics and sustainability."

Garde, E., S. Kutz, H. Schwantje, A. Veitch, E. Jenkins, and B. Elkin. 2005. Examining the risk of disease transmission between wild Dall's sheep and mountain goats, and introduced domestic sheep, goats, and llamas in the Northwest Territories. Other Publications in Zoonotics and Wildlife Disease. Paper 29. <http://digitalcommons.unl.edu/zoonoticspub/29>. Accessed 16 December 2011.

Federal Position/Recommended Action: The OSM recommendation is to support the proposal.

Rationale: The OSM recognizes the importance of protecting Alaska's resources and important subsistence species from the introduction of diseases and the effects of invasive species; however, this issue has not been assessed through the Federal regulation process.

PROPOSAL 103 – 5 AAC 85.080. Unlawful methods of taking game; exceptions. Prohibit the use of felt soled wading boots while hunting game.

Current Federal Regulations: Currently there are no Federal hunting regulations restricting the use felt-soled wading boots.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal Subsistence users/wildlife: The prohibition of felt-soled wading boots could impact subsistence users by requiring them to purchase new gear; however the use of felt-soled wading boots has been associated with the introduction of invasive species, such as didymo (*Didymosphenia geminata*), mycospores of the parasite that causes whirling disease (*Myxobolus cerebralis*), and New Zealand mudsnails into aquatic environments. Introductions of invasive species could result in significant impacts to habitats and subsistence resources in Alaska.

Federal Position/Recommended Action: The OSM recommendation is to support the proposal.

Rationale: The OSM recognizes the importance of protecting Alaskan environments and important subsistence species from the effects of invasive species; however, this issue has not been assessed through the Federal regulation process. It is recognized that field gear is a potential pathway for transmitting invasive species and therefore the OSM supports educating hunters who



spend time in aquatic environments about the risk of spreading invasive organisms and effective disinfection procedures.

PROPOSAL 104 – 5 AAC 92.080. Unlawful methods of taking game; exceptions. Prohibit the use of deer or elk urine for use in taking game.

Current Federal Regulations: Currently there are no Federal hunting regulations restricting the use deer or elk urine for taking game.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal Subsistence users/wildlife: The introduction of diseases, such as Chronic Wasting Disease (CWD), could negatively impact ungulate populations in Alaska. Natural hosts of CWD include deer (mule deer, white-tailed deer, and black-tailed deer) and elk. In 2005, CWD was also diagnosed in a free-ranging moose in Colorado. There is also potential for the disease to spread to other non-ungulate species, as mink and ferrets have been susceptible to experimental inoculations. Transmission of CWD is not fully understood, but exposure to an infected animal's urine and other body fluids has been suspected. It does not appear that CWD spreads to humans, but the Center for Disease Control recommends not consuming animals that may have CWD and taking extra precautions when field-dressing animals.

Federal Position/Recommended Action: The OSM recommendation is to support the proposal.

Rationale: The OSM recognizes the importance of protecting Alaskan resources and important subsistence species from disease, pathogens, and the effects of invasive species; however, this issue has not been assessed through the Federal regulation process.

PROPOSAL 107 – 5 AAC 85.015. Hunting seasons and bag limits for black bears.

Eliminate the statewide bag limit for black bear.

Current Federal Regulations: Under Federal regulations, you may not take a species of wildlife, including black bear, in any unit, or portion of a unit, if your total take of that species already obtained anywhere in the State under Federal and State regulations equals or exceeds the harvest limit in that unit unless specified in the regulations. In units with open Federal seasons for black bear, harvest limits are between 1 and 3 black bears per year.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal Subsistence users/wildlife: By eliminating the statewide bag limit for black



bears, subsistence users hunting under State registration permits in multiple units could harvest additional black bears.

Currently, under State and Federal regulations, a user cannot harvest a black bear in a unit with a more restrictive harvest limit if that limit has been reached in another unit or units (e.g., a user who harvested a black bear in Unit 11 cannot hunt black bear in Unit 6 because the Unit 6 bag limit is one black bear). By removing the statewide bag limit, overharvest may be more likely for some black bear populations in units with more conservative bag limits.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** the proposal.

Rationale: The elimination of the statewide bag limit for black bear may reduce the effectiveness of localized management strategies. While black bear populations appear healthy in many GMUs, bag limit restrictions may be necessary to better manage populations in some units. By removing the statewide bag limit, users would still be able to harvest black bear in units with more conservative bag limits if they already harvested black bears in other units. In addition, the proposed regulatory change would result in different State and Federal regulations which could increase confusion among Federally qualified subsistence users.

PROPOSAL 109 – 5 AAC 85.015. Clarify and remove complicated or excessively restrictive regulations and ADF&G discretionary provisions pertaining to black bear hunting.

Current Federal Regulations: Federal regulations for black bear vary among Units 6-26, where those units with open Federal seasons have harvest limits of 1 to 3 black bear and seasons are primarily year round (Jul. 1–Jun. 30), with exceptions in Unit 6 (Sept. 1–Jun. 30) and Unit 17 (Aug. 1–May 31).

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal Subsistence users/wildlife: Some units require Federally qualified subsistence users to use a State harvest ticket for harvesting black bears. Standardizing State black bear regulations to no closed season and a 3 bear bag limit in Units 6-26, except Units 6C, 6D, and 14C, would create misalignment between State and Federal regulations in some units. Modifying the State black bear regulations would liberalize bag limits and/or harvest seasons in some units, which could lead to the overharvest of black bears in some areas.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** the proposal.

Rationale: Generalized harvest regulations can reduce confusion, but may reduce the ability of natural resource managers to manage populations. While black bear populations appear healthy



in many GMUs, some units may require more conservative harvest regulations. Harvest management strategies for black bear include setting season dates to late fall to protect females and restricting bag limits to reduce overharvest. Standardized harvest regulations throughout much of the State, especially the proposed liberal bag limit and season length, could reduce the ability to effectively manage black bear populations at smaller scales.

PROPOSAL 112 – 5 AAC 92.150, Evidence of sex and identity. Eliminate the evidence of sex regulation.

Current Federal Regulations: Federal regulations require evidence of sex and identity for the following:

If subsistence take of Dall sheep is restricted to a ram, you may not possess or transport a harvested sheep unless both horns accompany the animal.

If the subsistence taking of an ungulate, except sheep, is restricted to one sex in the local area, you may not possess or transport the carcass of an animal in that area unless sufficient portions of the external sex organs remain attached to indicate conclusively the sex of the animal, except in Units 1-5 antlers are also considered proof of sex for deer if the antlers are naturally attached to an entire carcass, with or without the viscera; and except in Units 11, 13, 19, 21, and 24, where you may possess either sufficient portions of the external sex organs (still attached to a portion of the carcass) or the head (with or without antlers attached; however, the antler stumps must remain attached) to indicate the sex of the harvested moose. This does not apply to the carcass of an ungulate that has been butchered and placed in storage or otherwise prepared for consumption upon arrival at the location where it is to be consumed.

If a moose harvest limit requires an antlered bull, an antler size, or configuration restriction, you may not possess or transport the moose carcass or its parts unless both antlers accompany the carcass or its parts. If you possess a set of antlers with less than the required number of brow tines on one antler, you must leave the antlers naturally attached to the unbroken, uncut skull plate. This does not apply to the carcass of an ungulate that has been butchered and placed in storage or otherwise prepared for consumption upon arrival at the location where it is to be consumed.

In areas where scaling is required by Federal regulations, you may not possess or transport the hide of a bear that does not have the penis sheath or vaginal orifice naturally attached to indicate conclusively the sex of the bear.

Is a similar issue being addressed by the Federal Subsistence Board? No.



Impact to Federal Subsistence users/wildlife: The elimination of the evidence of sex requirement could result in the increased harvest of protected sex classes, which may negatively affect the sustainability of harvested populations under current regulations. Females of many game species are protected due to their higher reproductive value to populations. Without an evidence of sex requirement, enforcement of sex-restricted regulations are difficult to enforce.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** the proposal.

Rationale: The regulation to require users to keep the evidence of sex on harvested animals is an important tool to enforce harvest regulations, especially when certain sex classes are protected to maintain or increase harvested populations. The proponent's suggestion of using DNA analysis to determine the sex of harvested individuals is impractical due to the cost of processing tissue samples and the increased time associated with determining the sex of an animal.



Ms. Linda Feiler
PO Box 148
Anchor Point, AK 99556-0148
(907) 299-8333

Dec 24, 2011

Defenders Petitions

Subject: Anchorage Meeting

Dear Defenders Petitions,

Why is it you can refuse to look at the facts and still turn a blind eye on what is right . I am personally afraid of you men and have stopped going to the meetings for fear that someone might kill me after a meeting since I disagree with you. My 93 year old friend who accompanied me brought this to my attention . You are a bunch of killers and I fear all you enjoy is killing.

I am contacting you about proposals that will be considered at the Anchorage meeting from January 13-17th.

While I commend the Board of Game for holding off on a decision on Proposals 35 and 36 until residents that have a stake in the Kenai region could comment, I strongly urge you to reject these proposals. These proposals would allow for aerial gunning of wolves on the Kenai Peninsula, a highly visible area that is important for tourism and recreation.

The biological evidence presented by the Alaska Department of Fish and Game has demonstrated that predation was not the cause of moose population problems in the Peninsula in the first place.

I support proposal 48, 94, 97, 108, 121 and 126. These proposals all aim to prohibit controversial predator management techniques from being used on national park lands in Alaska. Intentionally manipulating wildlife populations on park lands is against National Park Service policy.

Proposal 109 puts forward several regulatory changes which would allow for year-round harvest of black bears and an increase in black bear bag limits throughout the state. While certain bear populations might be able to sustain increased hunting, Alaska's managers do not have enough data to make sure all bear populations would be sustained under the proposed regulations. Please reject Proposal 109.

Proposals 118 and 120 aim to clarify wildlife regulations. While clarification of regulations is usually beneficial, portions of these proposals would allow bear baiting as a general bear hunting tool and also allow same day aerial harvest of bears at bait stations. These proposals go too far, please reject proposals 118 and 120.

Finally, please reject proposal 130. The goal of this proposal is to authorize a brown bear Intensive Management Program to protect declining muskoxen in Unit 26B. Muskoxen are impacted by many factors



including disease, habitat and weather. To date, insufficient time has been dedicated to understanding the decline. The Intensive Management Statute was not meant to be used as a general conservation tool, and this proposal is not based on sufficient study.

Thank you in advance for considering my comments.

Sincerely,
Ms. Linda Feiler



Ms. Sheryl Prewitt-Ronan
5931 Beverly Dr
Anchorage, AK 99516-3103
(907) 345-7221

Dec 21, 2011

Defenders Petitions

Subject: Anchorage Meeting

Dear Defenders Petitions,

I am contacting you about proposals 109, 118, 120 and 130 that will be considered at the Anchorage meeting from January 13-17th.

What on earth are you folks thinking? This constant hammering away at the bears and wolves in this state is bordering on insanity. I am so tired of the aerial hunting that this Board continues to push on us. The idea of baiting bears is asinine and cruel. Don't you understand what NO means? It appears not. We want this Board to stop the bear and wolf killings. The hunters in this state yield a lot of power over this Board. You should be ashamed of yourselves. You may think you have fooled some of the people, but you haven't fooled all of us.

Sincerely,
Ms. Sheryl Prewitt-Ronan



Mr. Matteo Trivella
Longare
Vicenza, AK 00001

Dec 21, 2011

Defenders Petitions

Subject: Anchorage Meeting

Dear Defenders Petitions,

I am contacting you about proposals that will be considered at the Anchorage meeting from January 13-17th.

While I commend the Board of Game for holding off on a decision on Proposals 35 and 36 until residents that have a stake in the Kenai region could comment, I strongly urge you to reject these proposals. These proposals would allow for aerial gunning of wolves on the Kenai Peninsula, a highly visible area that is important for tourism and recreation.

The biological evidence presented by the Alaska Department of Fish and Game has demonstrated that predation was not the cause of moose population problems in the Peninsula in the first place.

I support proposal 48, 94, 97, 108, 121 and 126. These proposals all aim to prohibit controversial predator management techniques from being used on national park lands in Alaska. Intentionally manipulating wildlife populations on park lands is against National Park Service policy.

Proposal 109 puts forward several regulatory changes which would allow for year-round harvest of black bears and an increase in black bear bag limits throughout the state. While certain bear populations might be able to sustain increased hunting, Alaska's managers do not have enough data to make sure all bear populations would be sustained under the proposed regulations. Please reject Proposal 109.

Proposals 118 and 120 aim to clarify wildlife regulations. While clarification of regulations is usually beneficial, portions of these proposals would allow bear baiting as a general bear hunting tool and also allow same day aerial harvest of bears at bait stations. These proposals go too far, please reject proposals 118 and 120.

Finally, please reject proposal 130. The goal of this proposal is to authorize a brown bear Intensive Management Program to protect declining muskoxen in Unit 26B. Muskoxen are impacted by many factors including disease, habitat and weather. To date, insufficient time has been dedicated to understanding the decline. The Intensive Management Statute was not meant to be used as a general conservation tool, and this proposal is not based on sufficient study.

Thank you in advance for considering my comments.



Ms. Sharon Pinsley
Dr. Erlich 9/5
8029 Rosedale
Jaffa/Juneau, AK 99801

Dec 21, 2011

Defenders Petitions

Subject: Anchorage Meeting

Dear Defenders Petitions,

I am contacting you about proposals that will be considered at the Anchorage meeting from January 13-17th.

While I commend the Board of Game for holding off on a decision on Proposals 35 and 36 until residents that have a stake in the Kenai region could comment, I strongly urge you to reject these proposals. These proposals would allow for aerial gunning of wolves on the Kenai Peninsula, a highly visible area that is important for tourism and recreation.

The biological evidence presented by the Alaska Department of Fish and Game has demonstrated that predation was not the cause of moose population problems in the Peninsula in the first place.

I support proposal 48, 94, 97, 108, 121 and 126. These proposals all aim to prohibit controversial predator management techniques from being used on national park lands in Alaska. Intentionally manipulating wildlife populations on park lands is against National Park Service policy.

Proposal 109 puts forward several regulatory changes which would allow for year-round harvest of black bears and an increase in black bear bag limits throughout the state. While certain bear populations might be able to sustain increased hunting, Alaska's managers do not have enough data to make sure all bear populations would be sustained under the proposed regulations. Please reject Proposal 109.

Proposals 118 and 120 aim to clarify wildlife regulations. While clarification of regulations is usually beneficial, portions of these proposals would allow bear baiting as a general bear hunting tool and also allow same day aerial harvest of bears at bait stations. These proposals go too far, please reject proposals 118 and 120.

Finally, please reject proposal 130. The goal of this proposal is to authorize a brown bear Intensive Management Program to protect declining muskoxen in Unit 26B. Muskoxen are impacted by many factors including disease, habitat and weather. To date, insufficient time has been dedicated to understanding the decline. The Intensive Management Statute was not meant to be used as a general conservation tool, and this proposal is not based on sufficient study.

When I came to live in Juneau, I discovered that the wolf population



had all but been decimated and I was heartsick! To learn that further eradication of this important natural element of our ecological balance is too horrifying to contemplate! For generations upon generations, the wolf was a symbol of the vitality and beauty of Alaska, esp valued by the native peoples, but not just! Please, consider very seriously the requests being made in this letter.

Thank you in advance for considering my comments.

Sincerely,
Ms. Sharon Pinsley



Dr. Sharon Jardine
Xxxl
Xxxxl
Toronto, AK 88888

Dec 21, 2011

Defenders Petitions

Subject: Anchorage Meeting

Dear Defenders Petitions,

I am contacting you about proposals that will be considered at the Anchorage meeting from January 13-17th. There has to be a more humane way of dealing with things. Resorting to the gunning sounds like a sport to me, these poor animals have no choice in this matter, & we are invading their territory. We are suppose to be the educated mammal, surely we can all work together.

While I commend the Board of Game for holding off on a decision on Proposals 35 and 36 until residents that have a stake in the Kenai region could comment, I strongly urge you to reject these proposals. These proposals would allow for aerial gunning of wolves on the Kenai Peninsula, a highly visible area that is important for tourism and recreation.

The biological evidence presented by the Alaska Department of Fish and Game has demonstrated that predation was not the cause of moose population problems in the Peninsula in the first place.

I support proposal 48, 94, 97, 108, 121 and 126. These proposals all aim to prohibit controversial predator management techniques from being used on national park lands in Alaska. Intentionally manipulating wildlife populations on park lands is against National Park Service policy.

Proposal 109 puts forward several regulatory changes which would allow for year-round harvest of black bears and an increase in black bear bag limits throughout the state. While certain bear populations might be able to sustain increased hunting, Alaska's managers do not have enough data to make sure all bear populations would be sustained under the proposed regulations. Please reject Proposal 109.

Proposals 118 and 120 aim to clarify wildlife regulations. While clarification of regulations is usually beneficial, portions of these proposals would allow bear baiting as a general bear hunting tool and also allow same day aerial harvest of bears at bait stations. These proposals go too far, please reject proposals 118 and 120.

Finally, please reject proposal 130. The goal of this proposal is to authorize a brown bear Intensive Management Program to protect declining muskoxen in Unit 26B. Muskoxen are impacted by many factors including disease, habitat and weather. To date, insufficient time has been dedicated to understanding the decline. The Intensive Management



Statute was not meant to be used as a general conservation tool, and this proposal is not based on sufficient study.

Thank you in advance for considering my comments.

Sincerely,
Dr. Sharon Jardine



Ms. Valerie DeLaune
PO Box 3082
Homer, AK 99603-3082
(907) 435-7060

Dec 20, 2011

Defenders Petitions

Subject: Anchorage Meeting

Dear Defenders Petitions,

I am contacting you about proposals that will be considered at the Anchorage meeting from January 13-17th.

I am outraged by the wolf massacre taking place in Alaska through the practice of aerial gunning. More than 1,000 wolves have been killed in this barbaric state-sanctioned practice since 2003.

Numerous scientific studies show that wolves are beneficial to the overall health of natural ecosystems. They help keep Alaska's moose and caribou populations healthy and strong. Wolves are also important to Alaska's billion-dollar tourism industry.

I urge you to use your power to halt this brutal, unnecessary and unethical practice at once.

I have been an Alaskan Resident since 1984. In that time, twice, as a State, WE HAVE VOTED TO END THIS PRACTICE!!! Why does it continue??? The people have spoken! This practice got reinstated by the Palin Administration. It is not even good science – wolves keep the herds healthy by killing the weak and sick. Humans kill the healthiest, biggest animals, which weakens the herd, so in the long run, it is not even in the best interest of the hunters. I am begging you to stop this - it is one of my highest priorities as far as issues. We have to stop acting as though humans are the only life on the planet that counts. In the end, we will just be screwing ourselves in the long run if we destroy this planet bit by bit.

And by the way, I have a degree in Natural Resources/Forestry, so I am not just a "tree-hugger." Since AK is a "Red" state, and the majority of people voted twice to end this practice, this is not just greenies against the hunters. (And I do hunt and fish too.)

While I commend the Board of Game for holding off on a decision on Proposals 35 and 36 until residents that have a stake in the Kenai region could comment, I strongly urge you to reject these proposals. These proposals would allow for aerial gunning of wolves on the Kenai Peninsula, a highly visible area that is important for tourism and recreation.

The biological evidence presented by the Alaska Department of Fish and Game has demonstrated that predation was not the cause of moose population problems in the Peninsula in the first place.



I support proposal 48, 94, 97, 108, 121 and 126. These proposals all aim to prohibit controversial predator management techniques from being used on national park lands in Alaska. Intentionally manipulating wildlife populations on park lands is against National Park Service policy.

Proposal 109 puts forward several regulatory changes which would allow for year-round harvest of black bears and an increase in black bear bag limits throughout the state. While certain bear populations might be able to sustain increased hunting, Alaska's managers do not have enough data to make sure all bear populations would be sustained under the proposed regulations. Please reject Proposal 109.

Proposals 118 and 120 aim to clarify wildlife regulations. While clarification of regulations is usually beneficial, portions of these proposals would allow bear baiting as a general bear hunting tool and also allow same day aerial harvest of bears at bait stations. These proposals go too far, please reject proposals 118 and 120.

Finally, please reject proposal 130. The goal of this proposal is to authorize a brown bear Intensive Management Program to protect declining muskoxen in Unit 26B. Muskoxen are impacted by many factors including disease, habitat and weather. To date, insufficient time has been dedicated to understanding the decline. The Intensive Management Statute was not meant to be used as a general conservation tool, and this proposal is not based on sufficient study.

Thank you in advance for considering my comments.

Sincerely,
Ms. Valerie DeLaune



Mr. Jef Harvey
13145 S Old Glenn Hwy
Palmer, AK 99645-8290

Dec 20, 2011

Defenders Petitions

Subject: Anchorage Meeting

Dear Defenders Petitions,

I am contacting you, through services provided by the good people at Defenders of Wildlife, about proposals that will be considered at the Anchorage meeting from January 13-17th.

While I commend the Board of Game for holding off on a decision on Proposals 35 and 36 until residents that have a stake in the Kenai region could comment, I strongly urge you to reject these proposals. These proposals would allow for aerial gunning of wolves on the Kenai Peninsula, a highly visible area that is important for tourism and recreation. I personally know several people who would love to visit Alaska, but who will not do so specifically because of these policies. I don't know that many people, and so I can only conclude that there must be tens of thousands of intelligent potential tourists who will not be spending a dime here while these unscientific and completely ignorant "predator control" programs continue.

Oh, and also, the biological evidence presented by the Alaska Department of Fish and Game has demonstrated that predation was NOT the cause of moose population problems in the Peninsula in the first place.

I support proposal 48, 94, 97, 108, 121 and 126. These proposals all aim to prohibit controversial predator management techniques from being used on national park lands in Alaska. Intentionally manipulating wildlife populations on park lands is against National Park Service policy. It is also completely stupid and crazy.

Finally, please reject proposal 130. The goal of this proposal is to authorize a brown bear Intensive Management Program, with the goal of protecting declining muskoxen in Unit 26B. However, muskoxen are impacted by many factors including disease, habitat, and weather. To date, insufficient time has been dedicated to understanding the decline. The Intensive Management Statute was not meant to be used as a general conservation tool, and this proposal is not based on sufficient study.

Thank you in advance for considering my comments.

Sincerely,
Mr. Jef Harvey



Ms. Melissa Taylor
3839 Cope St.
Anchorage, AK 99503-5719

Dec 20, 2011

Defenders Petitions

Subject: Anchorage Meeting

Dear Defenders Petitions,

I am contacting you about proposals that will be considered at the Anchorage meeting from January 13-17th.

While I commend the Board of Game for holding off on a decision on Proposals 35 and 36 until residents that have a stake in the Kenai region could comment, I strongly urge you to reject these proposals. These proposals would allow for aerial gunning of wolves on the Kenai Peninsula, a highly visible area that is important for tourism and recreation.

The biological evidence presented by the Alaska Department of Fish and Game has demonstrated that predation was not the cause of moose population problems in the Peninsula in the first place.

I support proposal 48, 94, 97, 108, 121 and 126. These proposals all aim to prohibit controversial predator management techniques from being used on national park lands in Alaska. Intentionally manipulating wildlife populations on park lands is against National Park Service policy.

Proposal 109 puts forward several regulatory changes which would allow for year-round harvest of black bears and an increase in black bear bag limits throughout the state. While certain bear populations might be able to sustain increased hunting, Alaska's managers do not have enough data to make sure all bear populations would be sustained under the proposed regulations. Please reject Proposal 109.

Proposals 118 and 120 aim to clarify wildlife regulations. While clarification of regulations is usually beneficial, portions of these proposals would allow bear baiting as a general bear hunting tool and also allow same day aerial harvest of bears at bait stations. These proposals go too far, please reject proposals 118 and 120.

Finally, please reject proposal 130. The goal of this proposal is to authorize a brown bear Intensive Management Program to protect declining muskoxen in Unit 26B. Muskoxen are impacted by many factors including disease, habitat and weather. To date, insufficient time has been dedicated to understanding the decline. The Intensive Management Statute was not meant to be used as a general conservation tool, and this proposal is not based on sufficient study.

Thank you in advance for considering my comments.



please stop killing things just for the hell of it!!!! none of this is
nessissary at this time and it's just all about that alaskan desire to
destroy. jesus christ, find a new hobbie.

Sincerely,
Ms. Melissa Taylor



Ms. Alie D.
437 Fredricks Dr
Anchorage, AK 99504-1161

Dec 20, 2011

Defenders Petitions

Subject: Anchorage Meeting

Dear Defenders Petitions,

As A lifelong Alaskan hunting is well in my nature, but we hut to survive, and as i see people hunting wolves for and bears for sport just for their fur it makes me sick. Yes our wolf population has increased and there have been 3 reports on them over the past 5 years. That is no reason to hunt them! there is other options then to kill. People die in cars every day, do we sell less cars?? NO...people kill people ever day. do we get to kill hat person who killed them that easy? NO.. As a life long alaskan i have never had A bad encounter with ANY animal in this state, and ive seen and been very close to them all. Allowing to hunt 10 wolves every day is the most foul thing i have ever herd and whoever could make such a law is a very horrible person. The huntine of wolves and bears need to be put to an end. WE are the ones who come into and on their territory, if someone came on mine ide wanna bite them too. SO its not their fault, ITS OUR FAULT. SO LEAVE TIEM ALONE. people ehp get attacked should not of went o their land!!

thank you for letting me leave my opinion.
Alie D.

Sincerely,
Ms. Alie D.



Ms. Sherry Shafer
6110 E 12th Ave Apt 3b
Anchorage, AK 99504-2353

Dec 20, 2011

Defenders Petitions

Subject: Anchorage Meeting

Dear Defenders Petitions,

I am contacting you about proposals that will be considered at the Anchorage meeting from January 13-17th.

While I commend the Board of Game for holding off on a decision on Proposals 35 and 36 until residents that have a stake in the Kenai region could comment, I strongly urge you to reject these proposals. These proposals would allow for aerial gunning of wolves on the Kenai Peninsula, a highly visible area that is important for tourism and recreation.

The biological evidence presented by the Alaska Department of Fish and Game has demonstrated that predation was not the cause of moose population problems in the Peninsula in the first place.

I support proposal 48, 94, 97, 108, 121 and 126. These proposals all aim to prohibit controversial predator management techniques from being used on national park lands in Alaska. Intentionally manipulating wildlife populations on park lands is against National Park Service policy.

Proposal 109 puts forward several regulatory changes which would allow for year-round harvest of black bears and an increase in black bear bag limits throughout the state. While certain bear populations might be able to sustain increased hunting, Alaska's managers do not have enough data to make sure all bear populations would be sustained under the proposed regulations. Please reject Proposal 109.

Proposals 118 and 120 aim to clarify wildlife regulations. While clarification of regulations is usually beneficial, portions of these proposals would allow bear baiting as a general bear hunting tool and also allow same day aerial harvest of bears at bait stations. These proposals go too far, please reject proposals 118 and 120.

Finally, please reject proposal 130. The goal of this proposal is to authorize a brown bear Intensive Management Program to protect declining muskoxen in Unit 26B. Muskoxen are impacted by many factors including disease, habitat and weather. To date, insufficient time has been dedicated to understanding the decline. The Intensive Management Statute was not meant to be used as a general conservation tool, and this proposal is not based on sufficient study.

I would also ask that you respect the wishes of the citizens of Alaska. We have voted more than one time to stop aerial murder of our wildlife



- it's not hunting. This is our State and our resources. You need to respect our wishes. Do not mirror Congress and ignore us! Be responsible, do the appropriate studies using sufficient timeframes, only authorize FAIR hunting (no baiting, no aerial murder tactics, no year round hunts), and listen to the citizens of this state.

Thank you in advance for considering my comments.

Sincerely,
Ms. Sherry Shafer



Miss Cindy Koestler
PO Box 366
Tok, AK 99780-0366
(907) 883-0454

Dec 20, 2011

Defenders Petitions

Subject: Anchorage Meeting

Dear Defenders Petitions,

Really enough is enough, this state has been attacking wildlife and coming up with reasons that are not valid or true. Leave them alone, stop aerial hunting and do not allow bear baiting. Like Aerial hunting it is not fair hunting and it is cruel. I am contacting you about proposals that will be considered at the Anchorage meeting from January 13-17th.

While I commend the Board of Game for holding off on a decision on Proposals 35 and 36 until residents that have a stake in the Kenai region could comment, I strongly urge you to reject these proposals. These proposals would allow for aerial gunning of wolves on the Kenai Peninsula, a highly visible area that is important for tourism and recreation.

The biological evidence presented by the Alaska Department of Fish and Game has demonstrated that predation was not the cause of moose population problems in the Peninsula in the first place.

I support proposal 48, 94, 97, 108, 121 and 126. These proposals all aim to prohibit controversial predator management techniques from being used on national park lands in Alaska. Intentionally manipulating wildlife populations on park lands is against National Park Service policy.

Proposal 109 puts forward several regulatory changes which would allow for year-round harvest of black bears and an increase in black bear bag limits throughout the state. While certain bear populations might be able to sustain increased hunting, Alaska's managers do not have enough data to make sure all bear populations would be sustained under the proposed regulations. Please reject Proposal 109.

Proposals 118 and 120 aim to clarify wildlife regulations. While clarification of regulations is usually beneficial, portions of these proposals would allow bear baiting as a general bear hunting tool and also allow same day aerial harvest of bears at bait stations. These proposals go too far, please reject proposals 118 and 120.

Finally, please reject proposal 130. The goal of this proposal is to authorize a brown bear Intensive Management Program to protect declining muskoxen in Unit 26B. Muskoxen are impacted by many factors including disease, habitat and weather. To date, insufficient time has been dedicated to understanding the decline. The Intensive Management Statute was not meant to be used as a general conservation tool, and



this proposal is not based on sufficient study.
If you want to stop declining muskoxen in this state, keep the OUT OF
STATE HUNTERS IN THEIR OWN STATE.
Thank you in advance for considering my comments.

Sincerely,
Miss Cindy Koestler



Mrs. Lorin Clifford
ILB.
Palmer, AK 99645-

Dec 20, 2011

Defenders Petitions

Subject: Anchorage Meeting

Dear Defenders Petitions,

I am contacting you about proposals that will be considered at the Anchorage meeting from January 13-17th.

While I commend the Board of Game for holding off on a decision on Proposals 35 and 36 until residents that have a stake in the Kenai region--a highly visible area that is important for tourism and recreation--could comment. I strongly urge you to reject these proposals. The biological evidence presented by the Alaska Department of Fish and Game has demonstrated that predation was not the cause of moose population problems in the Peninsula in the first place.

I support proposal 48, 94, 97, 108, 121 and 126. Intentionally manipulating wildlife populations on park lands is against National Park Service policy.

Regarding Proposal 109, Alaska's managers do not have enough data to make sure all bear populations would be sustained under the proposed regulations; please reject Proposal 109.

Proposals 118 and 120 aim to clarify wildlife regulations. These proposals go too far; please reject proposals 118 and 120.

Finally, please reject proposal 130. Muskoxen are impacted by many factors including disease, habitat, and weather. To date, insufficient time has been dedicated to understanding the decline. The Intensive Management Statute was not meant to be used as a general conservation tool, and this proposal is not based on sufficient study.

Thank you in advance for considering my comments.

Sincerely,
Mrs. Lorin Clifford



Ms. Keri Stout
32280 Loki Rd # 3
Soldotna, AK 99669-8937
(907) 398-2848

Dec 20, 2011

Defenders Petitions

Subject: Anchorage Meeting

Dear Defenders Petitions,

I am contacting you about proposals that will be considered at the Anchorage meeting from January 13-17th.

While I commend the Board of Game for holding off on a decision on Proposals 35 and 36 until residents that have a stake in the Kenai region could comment, I strongly urge you to reject these proposals. These proposals would allow for aerial gunning of wolves on the Kenai Peninsula, a highly visible area that is important for tourism and recreation.

The biological evidence presented by the Alaska Department of Fish and Game has demonstrated that predation was not the cause of moose population problems in the Peninsula in the first place.

I support proposal 48, 94, 97, 108, 121 and 126. These proposals all aim to prohibit controversial predator management techniques from being used on national park lands in Alaska. Intentionally manipulating wildlife populations on park lands is against National Park Service policy.

Proposal 109 puts forward several regulatory changes which would allow for year-round harvest of black bears and an increase in black bear bag limits throughout the state. While certain bear populations might be able to sustain increased hunting, Alaska's managers do not have enough data to make sure all bear populations would be sustained under the proposed regulations. Please reject Proposal 109.

Proposals 118 and 120 aim to clarify wildlife regulations. While clarification of regulations is usually beneficial, portions of these proposals would allow bear baiting as a general bear hunting tool and also allow same day aerial harvest of bears at bait stations. These proposals go too far, please reject proposals 118 and 120.

Finally, please reject proposal 130. The goal of this proposal is to authorize a brown bear Intensive Management Program to protect declining muskoxen in Unit 26B. Muskoxen are impacted by many factors including disease, habitat and weather. To date, insufficient time has been dedicated to understanding the decline. The Intensive Management Statute was not meant to be used as a general conservation tool, and this proposal is not based on sufficient study.

Thank you in advance for considering my comments.

Sincerely,
Ms. Keri Stout

+ 170 signatories



December 28, 2011

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

Chuck Caldwell

From: Chuck Caldwell
P.O. Box 32196
Juneau, Alaska 99803-2196

RE: Proposal 43 on Beavers

I am a retired economist. Previously, I was the Chief of the Alaska Department of Labor's Research and Analysis Section for 15 years. Currently, I am a board member of the Juneau Trout Unlimited Chapter.

Pat O'Brien recently proposed beaver management should consider recent research which shows that beaver activity increases the size and number of salmon and trout in watersheds.

I read several recent studies which indicated that both growth and survival rates of salmon and trout were significantly improved when beavers were active in a watershed. Most studies were of cohos, though some showed similar benefits to sockeyes and trout. Apparently beaver ponds provide:

- slower water so that fry do not expend as much energy
- cover from predators
- increased depth for better survival during cold or low water periods
- higher nutrient levels

Studies specifically indicated that wood in the water was a factor which benefited fish habitat. So creation of small man-made dams would not be a suitable substitute.

In addition to the fisheries studies, there were many observations that populations of other wildlife increased, directly from the habitat created by beavers, and indirectly from the resulting increased salmon populations. Moose and waterfowl populations increased in areas where beaver trapping was eliminated. Other species, valuable to trappers, such as mink and otter were often seen near beaver ponds.

Prices for beaver pelts at the 2011 Western States Fur Auction (as reported by trappingtoday.com) averaged \$14.11. That web site also said "*Beaver prices have been lagging and don't look good going forward.*" Clearly the economic boost from increased salmon harvests would be much greater.

Groups that would benefit from increased beaver populations include:

- Those who subsist on salmon, moose, or waterfowl
- Commercial fishers, and processors
- Sports fishers
- Eco-tourism companies



I moved to the Kenai in July of 2009 and have seen an overall decline in the moose population. Specifically, the number of calves surviving to their first winter. Whether this decline is because of bears or wolves I'm not sure, but anyone who has spent any time in 15a can tell you there is plenty of habitat for the current populations of moose. At the trapping training put on by the refuge it was obvious that the wolve numbers are up and that can only mean that moose numbers are down. Is there any data on the brown bear populations, because the DLP count in 15a is sure up.

--

Tim Vlasak



Alaska Board of Game 2011/2012 Proposed Changes to Regulations

Comments submitted by:

Jake Sprankle, 2665 Monteverde Rd, Fairbanks, AK 99709

Email : jakesprankle@gmail.com

Proposals #78, 79, 80, 81, 82, 83, 84, 85, 86, 87, and 88 SUPPORT

A number of the proposals before you for this meeting deal with the management of our game resources for Alaska residents. Reading through the proposals submitted this year it is obvious that many Alaskans are frustrated with the way our game resources are being managed and with the decisions you and your predecessors have made in the past while serving on the Board of Game. I fully understand that being on the Board of Game is no easy task and requires a great deal of energy, time and commitment on your part. I also understand that many of the decisions you need to make can be difficult ones.

Nonetheless, many of your decisions should be “no-brainers”, but for some reason they are not and you and your predecessors have failed to uphold your duties to the State and to her residents. Our Alaska State Constitution clearly spells out how our game (and fish) resources are to be managed “for the maximum benefit of its people” and this should be the metric for any and all of your decisions while serving on the Board of Game. Our Constitution was written the way it was because its framers knew and understood that the best and highest use of our fish and game resources was feeding its residents. So I beg of you, read the proposals before you and evaluate them on what is best for first, the resource, and second, Alaska residents. For far too many times we have seen BOG decisions benefit the financial interests of a few and not the residents of this great State. Talk to any of the old timers that were in this country long before you and me and they will say to a person, that there was more game back then—not because of habitat, hunting pressure, or human population—but because of management. It is time for the Board of Game to step up to the plate and put the needs of its residents first and foremost in its decision process. You haven’t always done that in the past, and frankly, many of us are more than a little weary of that. We want healthy populations of game in our State and we want them managed for our benefit, our children’s benefit, and for future Alaskan’s benefit. Please remember this when you address these proposals. And know that though many of us cannot go to Anchorage to testify before you, we are watching, listening, and counting on you to do right for all Alaskans. Thank you for your time and for serving on the Board of Game

Proposals #57 and 58 SUPPORT.

Proposals #60 and 61 OPPOSE

Proposals #66, 67, 68, 69 and 70 SUPPORT

Proposals #71, 72, 73, 74, 75 SUPPORT

Proposal #77 Oppose

Proposals #78, 79, 80, 81, 82, 83, 84, 85, 86, 87, and 88 SUPPORT

Proposal 89 OPPOSE

Proposals #92, 93 and 94, 97, 102 OPPOSE

Proposals #133, 136, 137, SUPPORT

Proposal 138 OPPOSE

Proposal 139 Support



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

TO: Chairman Judkins and Board of Game Members
RE: Support of Regulation Proposal 43

December 28, 2011


Dear Chairman Judkins and Board Members,

I am in support of regulation proposal #43, which if adopted, would ensure that beavers are not trapped unnecessarily when flooding becomes apparent and causes property damage. This regulation would direct property owners to install beaver flow devices to mitigate or resolve flooding problems on their property. The ADF&G Commissioner could issue trapping permits only if such devices are determined not effective in alleviating the problem.

I strongly believe that the Joint Boards of Fish and Game need to update beaver management regulations concerning flooding and property damage. Regulation 5AAC.92.041 has been in place since 1989. Over the last 23 years there has been significant scientific research concerning the benefit of habitat created by beaver. This habitat is conducive for fish rearing and the promulgation of a variety of plants and wildlife.

Thank you for your time and attention to these important considerations regarding beaver management.

Respectfully Submitted,


Jenny Pursell



Dec. 23, 2011

Brian Okonek
P.O. Box 583
Talkeetna, AK 99676

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

Dear Board of Game,

I am totally against allowing the snaring of bears. I support proposals #127 Statewide and #142 Interior that would ban the use of snares for trapping bears. The heavy handed predator control regulations that have been adopted and are being proposed are taking this state back to the Dark Ages. Baiting and snaring are cruel and inhumane. Alaska can do much better than this.

This Fall I found a bear baiting station a quarter of a mile from my house. There were torn up plastic bags and food containers scattered all around and the station was unmarked. The hunter never returned to pick up the mess. I am very careful at my home to securely store all garbage, dog food, compost, etc. that may attract a bear. I use electric fencing around my house and shop when I am away. I object to the fact that it is legal to bait bears allowing people to take food out into the forest and attract the bears to them (the very thing we are told not to do around our homes). Bait station create a dangerous situation for other people that enjoy the forest for walking, berry picking and the pure pleasure of being out in the woods.

Sincerely,


Brian Okonek



STATE OF ALASKA

DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES

OFFICE OF THE COMMISSIONER

SEAN PARNELL, GOVERNOR

4111 Aviation Avenue
P.O. Box 196900
ANCHORAGE, ALASKA 99619-6900

PHONE: (907) 269-0730
FAX: (907) 269-0489
WEB: dot.state.ak.us

December 6, 2011

Mr. Scott Crass
Alaska Board of Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Mr. Crass,

I would like to comment on Proposal 43 – 5 AAC 92.041, Permit to take beavers to control damage to property.

We understand that this proposal would introduce a strong requirement to consider use of beaver flow devices to control flooding caused by beavers, and that the purpose of the proposal is to protect wildlife habitat created by beaver dams. While we recognize the value of wildlife habitat, our maintenance crews work hard to control wildlife activity on our airports and to minimize wildlife attractants. Taking measures to protect and increase wildlife habitat and activity on the airports will adversely affect safety of aviation. We strongly recommend the Board of Game not adopt this proposal.

We appreciate the excellent cooperation we receive from the Alaska Department of Fish and Game in keeping our airports safe for aviation. We know ADF&G considers alternate means of controlling beavers, and issues permits only when necessary. We would like ADF&G to continue to have a full range of options in helping us control wildlife activity on our airports.

Sincerely,



Steven D. Hatter, CM, PMP
Deputy Commissioner – Aviation



Patricia Cue
11903 Town Park Circle
Eagle River, AK ~~99603~~
97577

October 16, 2011
New Date: December 26, 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.



I am resending this letter as the Board of Game decided not to accept the original document sent to them in October. This is another example of their arrogance and their poor public persona. I cannot emphasize enough my desire to bring balance to this organization.

Patricia Cue 

cc Governor Sean Parnell



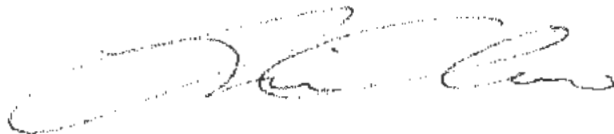
Lisa Climo
34268 Nugget St
Anchor Point, AK 99556

Alaska Board of Game
Boards Support Section
PO Box 115526
Juneau, AK 99811-5526

October 20, 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 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.



Lisa Climo
Anchor Point



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

December 26, 2011

To the Board of Game,

I am adamantly against adopting proposal 36 on the Kenai Peninsula for reasons as stated below.

1) ADF&G and many other biologists agree the decline in moose numbers in areas 15A and 15C is **not** a predation problem but rather a habitat problem. As requested, this testimony addresses only Proposal 36/area 15C, even though degraded habitat is a significant factor in both areas. Because proposal 36 does not address the problem of declining habitat in any way, for this reason alone, it **cannot be supported**. ADF&G states that in localized areas habitat degradation is high but not necessarily across the entire area. This is debatable. Other biologists feel the degradation of habitat throughout 15C is extensive and is having far reaching effects, not only on the game, which the Board seems to be concerned about, but the biological diversity that is integral in maintaining a balanced and healthy spectrum of wildlife from fish, waterfowl, land bird populations, and other land animals. Once the vegetative habitat that supports a spectrum of wildlife, including moose, is degraded, the long term affects take much longer to recover than any single predator or prey population. The effects will take decades rather than the short time it takes for the wolf population to come back. Degradation of the habitat due to what is occurring now (development, lack of fires, loss of spruce trees with the resulting succession of blue joint grass, extreme overbrowsing by 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 adjacent to the Homer Airport, as well as all 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 in the state established critical habitat in Homer, the winter 'habitat' is just about in name only. Increased off road motorized vehicle use in general presents another factor in stressing moose an already stressful time during the winter months, adding another factor to winter mortality. There is no regenerating moose browse to speak of in the southern peninsula habitat due to continual overbrowsing. 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.

The most recent survey measuring the twinning rate of moose in 15C is 30%, down from 71% when surveyed in the early 80's, is of concern and an indication that the current carrying capacity for moose is in decline. Considering 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 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 without having accurate information from which to act on. It is simply irresponsible, fiscally and biologically, to act this prematurely.

3) High numbers of year-round vehicular/moose collisions far outnumber wolf predation numbers.

4) Managing public lands for one species is short sighted, irresponsible and reckless. Managing public lands for high numbers of a single species of game, without consideration for the very habitat this single species needs to survive is short sighted, irresponsible and reckless. It will only result in more winter starvation. Proposal 36 (and proposal 35) fails to reflect a scientific/biologic understanding of balanced management on the State's behalf.

5) The logistics of carrying out proposal 36 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, or private pilots flying around in, and shooting from, helicopters or planes 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,

This looks like both proposals 35 and 36 are politically driven rather than biologically. They cannot be based in science because the science has not yet been done. These proposals are irresponsible and fiscally wasteful.

Sincerely,



Rika Mouw

Homer, Alaska

P.O. Box 4084
 Homer, AK 99603



December 29, 2011

Comments to the Alaska Board of Game 2012 Statewide Meeting

Proposal 88 – 5AAC, Chapter 85. Seasons and bag limits. Convert all nonresident sheep seasons to drawing permits and limit to 10 percent of total permits.

SUPPORT

This proposal (#88) speaks to problems that the Board of Game (BOG), the Big Game Commercial Services Board (BGCSB), the Department, and the guide industry lobby have spoken of for many years.

This Board called it “*uncontrolled guiding*” in their letter of support from 2008 for the Guide Concession Program (GCP), which would limit the number of guides that could work in certain areas. And I think it’s important that the Board reviews that letter, particularly the Resource Conservation concerns expressed at that time.¹ The Big Game Commercial Services Board (BGCSB) had similar concerns.²

The Alaska Professional Hunters Association, in stating four years ago why the GCP was necessary, had this to say: “*Currently, overcrowding of guides on State lands combined with decreasing wildlife populations is stimulating social disorder between hunter user groups and biological harm to our wildlife which leads to establishment of the restrictive drawing permit hunts.*”³

Nowhere does this “uncontrolled” or “unlimited” guiding have a greater negative impact in Alaska than the sheep hunting realm. I have participated in the BOG process during this time and have heard various sheep proposals before the Board that asked for a resident sheep hunting preference, or to limit nonresident sheep hunters. The Board’s response has been that the best way to deal with these issues is to hold off until the GCP is implemented. This was clearly stated by BOG member Spraker at a BGCSB meeting in 2010, as per the meeting minutes: “*Mr. Spraker stated that he is also disappointed in the DNR timeline delays, and that the board of game has held off making decisions based on the DNR concession program. Mr Spraker warns that the board of game will probably be forced to make more restrictions over the next few years.*”⁴

The GCP continues to be stalled, is fraught with a number of issues that unless fixed make it untenable, and the newest timeline for implementation (January 2014) is highly likely not to be met. If implementation does ever occur, it is probable it will land in court and be further delayed or possibly negated.

¹ http://dnr.alaska.gov/mlw/gcp/documents/january_11_2008_letter.pdf

² http://dnr.alaska.gov/mlw/gcp/documents/bgcsb_121909_letter.pdf

³ Letter from APIHA Executive Director Bobby Fithian to the Palin Administration December 2, 2008

⁴ http://www.dced.state.ak.us/OCC/pub/BGCSB_meeting_minutes_12_10.pdf



BOG Comments from Mark Richards PO Box 154 Eagle, AK 99738

Limiting nonresident sheep hunters in order to effectively limit guides has always been an option for the Board and a solution that will hold up to any legal scrutiny. And while not every single area on state and blm lands that still has open general season nonresident opportunity has problems, if we attempt to fix the problems subunit by subunit, as this board did in 13D/14A, that is going to just spread these problems to other still-open areas.

That is why I believe we need a regional or statewide "fix," as this proposal asks for.

The main arguments against Proposal 88 I am hearing seem to center on two positions:

- 1) There is no sheep resource concern thus we don't need to do anything.
- 2) Limiting nonresident sheep hunters will have devastating financial effects to the state and to Division of Wildlife Conservation (DWC) funding.

As to #1, whatever conclusions are drawn from any new study of past sheep harvest and age data, I would strongly posit that the vast majority of sheep hunters are looking for a full curl ram, not an "age legal" ram, and that in the last four years our overall sheep resource has not become more abundant. Some dall rams never get to full curl, some reach it later in age than others, and any claims that there are plenty of "age legal" sheep left on the mountain each year and thus we have no resource concern misses the reality of what sheep hunters are after, and how the Department itself conducts population compositions and makes decisions.

Since the Department cannot survey each area and we often lack current sheep composition data for many areas, I would put forward that this Board does not have to base a decision on all nonresident sheep hunts going to draw only with a capped allocation on a proven known resource concern at this time. The Board's past comments having to do with resource conservation concerns stemming from uncontrolled guiding, and what we see happening in areas like 20A North, should in and of themselves be a call to do something now on a wider scale.

As to #2, I think it's well past time that this Board and the guide industry lobby acknowledge and admit that the GCP if it ever did come into being is going to reduce the number of total guides in many concession areas, particularly having to do with sheep guiding. That means less nonresident sheep hunters and so we will see similar financial impacts to limiting nonresident opportunity as this proposal asks. In fact, if that isn't the case, then we have all been sold a bill of goods as to what the GCP would really do.

Another issue is that even when we do limit nonresident sheep hunting opportunities, it often does not correspond to a lowering of nonresident sheep harvests. The statewide nonresident sheep harvest average of 40% is, in the minds of many resident Alaskans, an injustice in that it has been allowed to continue for so long. The much higher nonresident sheep harvest rates well beyond 50% that we see in many areas are in my Alaskan resident opinion a travesty.

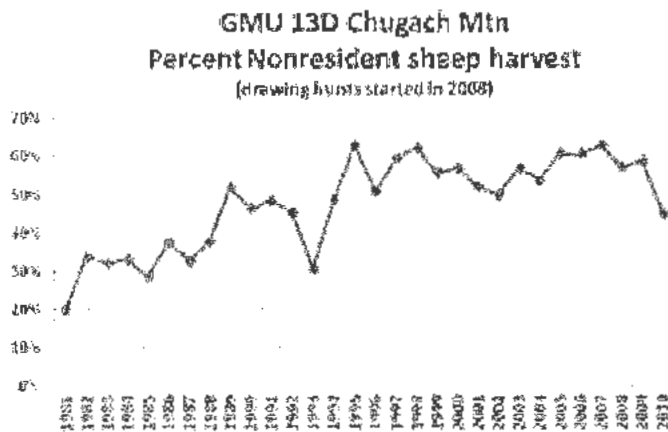


BOG Comments from Mark Richards PO Box 154 Eagle, AK 99738

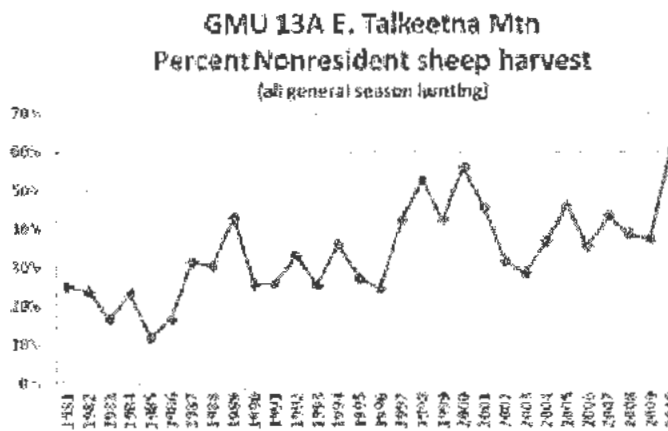
There are many reasons for these high nonresident harvest rates, of course guided hunters will be more successful than unguided hunters, and Alaska law mandates all nonresident sheep hunters hire a guide, but if we look at the growing disparity between nonresident and resident success rates in some of these areas, it speaks to other things going on in the field that negatively affect resident hunters and their success rates.

This is why so many support a resident only earlier sheep season, and I have to admit in looking over some of the statistics, there is a good case that may be the best way to show a clear resident harvest preference.

For example, when 13D went to draw only for all in 2008, this Board allocated 20% of permits to nonresidents. The graph below shows nonresident harvest rates over time. In the mid 1990s we saw an increase in nonresident guided sheep hunters, and ever since then their harvest rates were between 50 and 60 percent. Note that in 2008 (after going to draw only) that nonresidents took 58% of the sheep, in 2009 they took 59% of the sheep, and in 2010 they took 45% of the sheep. Averaged out, after going to draw only with a capped allocation nonresident harvest rates remained above 50%.



The next graph shows nonresident harvest over time for 13A E. Talkeetnas. Even though nonresidents only make up 10% of total sheep hunters there, in 2010 they took 60% of the harvest.



BOG Comments from Mark Richards PO Box 154 Eagle, AK 99738

These nonresident sheep harvest rates are unacceptable to a great many Alaskans. We see the same thing in other areas as well. So in thinking about nonresident allocation schemes, I would like the board to focus on something that results in nonresident sheep harvest rates going down, not staying the same.

If the Board is still reluctant to go to a regional or statewide "fix" and wants to continue to wait for the GCP solution, perhaps a sunset clause could be considered. The Board limits nonresident opportunity and caps allocation now regionally or statewide but inserts a sunset clause that when/if the GCP is implemented the draw only and capped allocation is sunsetted. And the Department, working with DNR, will provide estimates on what kind of guided sheep harvests in individual concession areas are acceptable. That seems like a fair compromise that could work, yet provide a solution now.

Again, I would stress that just looking at and dealing with the problem areas only pushes the pressures and conflicts elsewhere. This Board and other entities didn't propose a subunit by subunit fix for the "uncontrolled guiding" problem, they recommended and supported a statewide Guide Concession Program. In the same vein, since the GCP may not actually ever come into being, we need a regional or statewide fix to limit nonresident sheep hunters (and thus the guides).

Like many others, I want to ensure that my kids and grandkids have the opportunity to hunt sheep in the future. Right now one of the main impediments to ensuring that is the known problems we have with unlimited guiding on state and blm lands with still-open nonresident general season hunts. It's past time for the Board to act, we can no longer afford to wait for the GCP solution that may never come about. **Neither can we afford to defer this and other sheep proposals on the grounds we need more information.** All the information we need is summed up in letters going back four and more years from the guide industry lobby, the BOG, BGCSB, and in Department management reports.

I respectfully urge this Board to pass some version of Proposal 88 now.

Thank you for the opportunity to comment and for your service to the state of Alaska and all hunters and trappers.

Sincerely,

Mark Richards

50-mile Kandik River

PO Box 154

Eagle, AK 99738

kandik@starband.net



My name is Terry Marquette and I am a licensed Taxidermist in North Pole , and the owner of Black Bear Taxidermy for the past 14 years. I have commented on the original proposal previously and oppose proposal 220 for all of the reasons that have been mentioned. It is a violation of my Constitutional rights to privacy by subjecting my home and business to being searched without a warrant supported by cause. Since proposal 220 was tabled for further consideration it has been rewritten and resubmitted as proposal 49. I would like to submit a few comments related to this new proposal.

1. The new proposal still violates the Constitutional rights of the taxidermist. Records are searched without a warrant at the demand of a Wildlife Trooper.
2. The stated justification for allowing this action is to cut down on "the laundering and illegal sale of wildlife specimens". We have repeatedly asked for examples of this happening by any licensed Taxidermist in the past and no example has been given. There are only about 100 licensed Taxidermists in Alaska. I find it hard to believe that anyone would do this type of activity through their business. Personally I don't think there have been any businesses that have been apprehended being involved in this type of game "laundering".
3. The new proposal will do nothing toward stopping the selling of game animals and parts illegally. Of the thousands of animals that are harvested each year by hunters and trappers only a very small percentage is ever taken to a Taxidermist. I would guess around 5% of the total harvest at the very most. This leaves an awful lot of animals outside the Troopers plan to have a tracking source of animals and harvest records available for casual perusal to find an illegal harvest or sale. Anyone involved with the selling of game or game parts would simply stay away from the Taxidermy shop and pursue sales without setting up a record that can be trailed and traced.
4. It seems the Troopers are trying to set up a system of marking harvested animals so they can be kept away from the illegal sale of these critters after harvest. If this is what is desired then a massive system of tagging, plugging and sealing has to be created. I can't imagine the State implementing such a program, but the half baked attempt to do this by slamming Taxidermists will not work. The passage of proposal 49 will only create a clerical trap for a bunch of wildlife artists to get into trouble with. It will also result in several of us leaving the profession.

Terry Marquette

12/14/11

Comments for
Proposal 49



Ronald G. Clarke
P.O. Box 22372
Juneau, AK 99802-2372
(907) 723-6840

29 December 2011

Alaska Board of Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
Fax: (907) 465-6094

Dear Chairman Judkins and Members of the Alaska Board of Game,

Falconry and the birds of prey it employs have fascinated me since I was a child. I have been actively engaged in the sport of falconry in Alaska since 1977. Along the way, I have rehabilitated and released to the wild many sick or injured raptors; the unlucky ones had to be humanely euthanized, and there have been plenty of them, too. I have participated in field research on a variety of raptor species, and have visited innumerable classrooms, civic groups, and Pioneers' Homes with my trained birds in an ongoing effort to increase public appreciation for these valuable birds. I hold degrees in Fish and Wildlife Management (B.S., Montana State University, 1977) and Zoology (M.S., University of Alaska Fairbanks, 1984), and recently retired as Assistant Director of the Wildlife Conservation Division of the Alaska Department of Fish and Game ("Department").

Thank you for the opportunity to comment on proposals regarding regulation of falconry in Alaska.

Let me begin by observing a fact about hunting with birds of prey that all parties involved agree on: falconry in Alaska exerts no measurable impact on either wild raptors or their quarry. Even so, falconers operate under extensive and complex regulations, an odd situation for activities that are biologically non-existent. Scores of raptors are killed each year in Alaska. They are shot, trapped, hit by cars, trucks and trains, electrocuted, and crash into windows, fences, and power lines – yet falconers are the only ones restricted by many pages of regulations, all to control an activity that has no impact. Odd, indeed.

Still, legally and otherwise, we seem to be stuck with this regulatory overkill. I'm willing to live with it. Flying raptors at wild quarry is an exciting, addictive method of hunting, and I will tolerate complex, unnecessary regulations if that's what it takes to pursue my sport. It makes no sense biologically, and creates a lot of work for falconers and the Department, but so be it.

To save you some reading, let me simply say I support the Alaska Falconers Association's (AFA) views on Alaska's falconry regulations and the federal realignment that forced all the states to rewrite their rules. I endorse that organization's written testimony to you and will not reiterate it in detail here.



Briefly, I respectfully request that you 1) adopt Proposal No. 38 in its entirety; 2) reject Proposal No. 39, and 3) reject Proposal No. 40. If you see the need to make additions or amendments of your own, please use Proposal No. 38 as your starting point.

Briefly, the AFA's Proposal No. 38 1) was turned in on time, 2) was developed carefully over nearly two years with input from Alaska's falconers, the Department, and the U.S. Fish and Wildlife Service ("Service"), and 3) has been reviewed and approved by the Service as meeting their minimum requirements. The details of the Department's Proposal No. 39 were delivered seven months late, were crafted quickly and internally to the Department, and have not been reviewed by the Service.

Fortunately, falconers and the Department are not far apart in their views of the new federal regulations. There remain several minor differences that you may end up deciding on before adopting a final version of the new rules. Briefly, I ask that you adopt the AFA approach on these matters – which are all incorporated in Proposal No. 38 – namely, 1) a longer list of species available for use by falconers, 2) eliminating annual reporting requirements, and 3) not requiring sterilization of non-indigenous goshawk subspecies, or, at minimum, accepting behavioral sterilization in addition to surgical sterilization.

There is no reason to keep falconers from flying raptor species allowed by the federal regulations. Annual reports are redundant because falconers already have to and will continue to be required to file a federal form 3-186A every time they acquire, dispose of, transfer, or release a bird, any time a bird is lost or stolen, or when a bird dies. The Department doesn't do anything with the annual report information anyway. Surgical sterilization of non-indigenous goshawks is unnecessary, expensive, and potentially dangerous; simply imprinting birds on humans gives ample protection against the infinitesimally small possibility of a non-indigenous goshawk subspecies escaping to the wild and surviving long enough to breed with a local goshawk.

Finally, please reject Proposal No. 40. It has so many problems it isn't worth the Board's time to consider it seriously. If the Board wishes to develop a non-resident take scheme, I suggest you convene Alaska falconers and the Department in a work session after this meeting to discuss the many issues involved with non-resident take.

Thank you for your public service. The Alaska Board of Game process is a remarkable and valuable thing. We appreciate your time and attention to wildlife management in Alaska, even its unusual and esoteric aspects, such as the practice of falconry. The few of us that train and fly raptors at wild quarry appreciate your efforts to make it possible for us to engage in this happy addiction.

Thank you.

Sincerely yours,



Ronald G. Clarke



To the Board of Game

The current moose population on the Kenai Peninsula is in sad shape. As the chairman of the Kenai-Soldotna advisory committee I have heard testimony from countless Alaskan's about how it use to be. We have heard stories of their brown bear encounter's while moose hunting. I think you should see more moose than brown bears when you go moose hunting. This past summer in the city limits of Soldotna a police officer had to put down a very large bear when it charged him. As a resident just outside the city limits of Soldotna in a neighborhood bordering the Kenai River I have had numerous moose calves eaten by brown bears in my yard. The fact that even with an abundance of brown bear DLP's in the last decade the brown bear population seems to be thriving and growing. The moose population is declining. As a trapper I have seen the increase in wolf numbers and a drop in the numbers in moose I would see on my trap line. In GMU 15a there probably is a habitat issue if the moose population was what it should be. There seems to be an abundance of moose browse to me. The low calf survival rate can be directly attributed to predation. You cannot maintain a healthy heard with the calf survival rates we currently have. The fact that the Kenai National Wildlife Refuge will not work to help the situatiou is certainly a problem. When it was changed from the moose range to the refuge it was a sad day. I believe that they were to maintain a stable and thriving moose population. They have failed us in that regard. I think that the State of Alaska should not let up pressure on them to work on this problem. I hope that in the future both can work together on this issue. You will here lots of reasons not to pass proposals that would start a predator management program on the Kenai Peninsula. You will here that the real issue is habitat. We cannot do any thing about the habitat because of the refuge in 15a. We can address the predator issue off of the refuge. A perfect answer would be for a large fire in 15a in the near future. In the mean time WE MUST DO SOMETHING. We cannot just sit on the sidelines and hope something changes. I encourage you to pass proposal 35 and 36. I also encourage you to pass the agenda change request put in by the Kenai-Soldotna Advisory committee to open a registration hunt for brown bears on the Kenai Peninsula. The current draw hunt leaves a valuable resource under utilized. The residents of the peninsula had to swallow a large pill last fall with the new restrictions on moose hunting. Do not let us down by not doing something.

Sincerely,
Mike Crawford
Alaska Resident



Kim Busch
PO Box 20629
Juneau, Alaska 99802
(907) 500-9719
December 29, 2011

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

Proposal 43 on beavers

Dear Members of the Board of Game,

This is in support of Proposal 43 on beavers. In doing a little background searching I found the following on the DF&G web site regarding trapping of beavers:

- *"About 8,000 Alaskans buy licenses that enable them to trap, but it's hard to estimate the actual number who trap. There is a wide range of trappers, most are recreational trappers, and many trappers keep the fur. Some are fairly serious, and a few are very serious individuals who trap a lot of animals".*
- During trapping season, 21 units have "no limit" on the number of beavers that can be trapped. Three units allow 20-30 per season. Only two have no open season. Three have no closed season
- In the 2008-2009 Trappers Report (the most recent on the site) 1,283 beaver were reported killed. The number killed is under reported because statistics are taken from sealing records and not all units are required to seal beaver. We can conclude that a minimum of 1,289 beaver families were disrupted and, if the mother of nursing kits was taken, the kits would starve.
- The average price for a beaver pelt was \$14.04.

Given the research on the high value of beaver created habitat, especially to fisheries, but also to a wide range of other wildlife, the designation of "no limit" and "no closed season" on trapping beavers seems ludicrous. This is especially true because a "few very serious trappers" are gaining a small amount of money at great expense to the fishing industry. In addition we are losing prime habitat for moose and other ungulates, game birds, and more.

Please make the reasonable choice and adopt Proposal 43.

Thank you for considering this important issue.

Sincerely,


Kim Busch



Patricia J. O'Brien
PO Box 35451
Juneau, Alaska 99803-5451
(907) 789-9405
December 27, 2011

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

Proposal 43 on beavers

Dear Members of the Board of Game,

Alaska wildlife management practices do not reflect the value of beaver created habitat, critical to fisheries and providing for an array of birds, including waterfowl, mammals, including moose and other ungulates, small mammals like mink and otter, insects, and an range of plants that attract wildlife.

There is no avenue to address this concern outside of the schedule of regulations listed by the Board, so I drafted Proposal 43 in two parts, by piggybacking the habitat concern onto a trapping permit regulation that is on the board schedule. The following information was provided to the Juneau AC where the proposal passed by a vote of six to three.

1. Recommend the management of beavers be updated to reflect a decade of new research and growing appreciation for the beaver's habitat value to fisheries and wildlife. DF&G should be directed to obtain updated research (examples below). As a habitat issue affecting both fisheries and wildlife, this might best be handled by referring the matter to the Joint Boards. They could review the information and work toward resolution of the conflict between supporting high-value beaver-created habitat for fish and wildlife and excessively open beaver trapping regulations.

Examples of research findings on fish ungulates, and mammals:

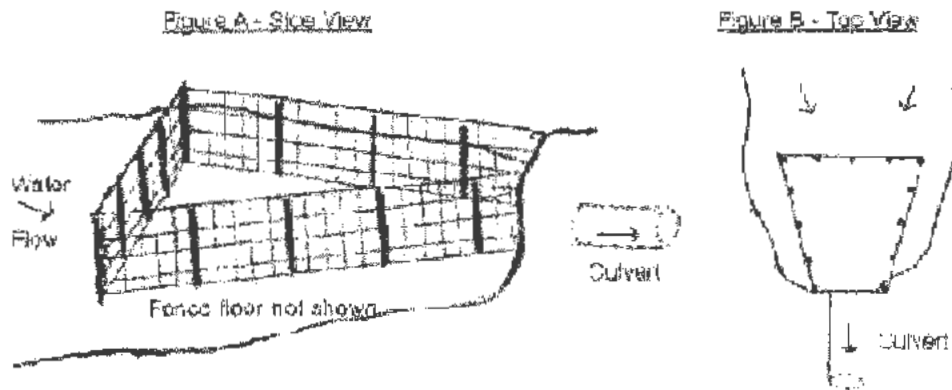
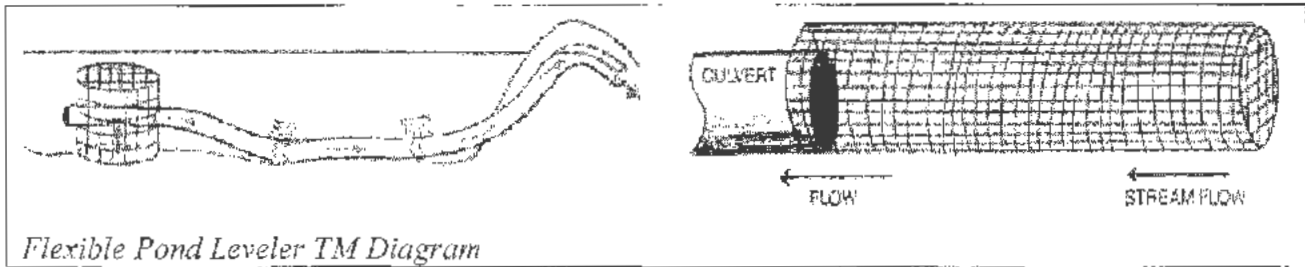
- *Of particular interest on the pacific Coast of North America is the rearing habitat that beaver ponds provide for juvenile salmonids, most notably coho salmon... at a higher density, are consistently larger, and have a greater overwinter survival rate than juveniles that use side channels... Beaver ponds also serve as important rearing areas in summer.* Pollock
- Researchers concluded that the primary physical limitation to coho salmon production in the study area was the lack of beaver ponds. They attributed this in part to trapping and advised any watershed restoration project that excludes beaver as a restoration tool will have limited success in restoring coho salmon populations. Pollock
- *Size and Growth. Juvenile sockeye were larger in beaver ponds than other habitats, indicating faster growth because of higher temperature.* Murphy
- *Moose and other ungulates. Studies from the NE in the lower 48 and parts of Canada indicate that moose numbers have rebounded following restrictions on beaver trapping and wetlands protection. Northern Woodlands. See also a UAF Science forum.*
- *From a compilation of research on beavers: Beaver create food for large mammals including ... deer, elk, and moose (Rosell et al. 2005). In forested areas, beaver meadows are important sources of succulent plants used by ungulates... (Kay 1994). Beaver ponds and meadows are important sources of aquatic plants for moose (Muller---Schwarze and Sun2003). The beaver--willow mutualism results in abundant riparian willows, which are used as browse by ungulates (Coady, Kay 1994, Kay1997, Baker et al. 2005)... During fall and winter ungulates make use of bark and branches from trees that have been felled by beavor (Rosell et al. 2005)...*



I am requesting that the BoG refer the habitat issue to the Joint Boards of Fisheries and Game to consider directing DF&G to update their research on beavers and to form recommendations for adapting the management of beavers based on updated knowledge.

- 2. Amend 5 AAC 92.041 dealing with a permit to trap or otherwise "take" beavers outside of the trapping season to protect property by considering beaver flow devices – a more effective and appropriate alternative, than killing beavers in most cases.

Following are diagrams of three flow devices used in the lower 48 and in Juneau Alaska. The flexible pond leveler is the most expensive of these devices. In Juneau that cost is \$267.



Research published by the MA Association of Wetland Scientists found that flow devices are demonstrated to be more effective at protecting property than trapping after five years.

Thank you for your time in reviewing this proposal and considering this important habitat issue.

Sincerely,


Patricia O'Brien



Patricia J. O'Brien
PO Box 35451
Juneau, Alaska 99803-5451
(907) 789-9405
December 29, 2011

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

Proposals 35, 36, and 127

Dear Members of the Board of Game,

I have lived in Alaska for 43 years and hunted when I first moved here. It is with deep concern that I have watched some of the policies move away from science based knowledge toward numerous short term practices that do not bode well for the future of Alaskan wildlife.

I **oppose Proposals #35 and #36**. These proposals would ignore ADF&G science that habitat is the limiting factor for moose in this area, not wolves. Killing the wolves will not produce the habitat moose need for sustenance. The adoption of these proposals has statewide implications. Please do not set this bad precedent for Alaska.

I **support Proposal # 127**. I have closely followed this cruel and indiscriminant "experiment" adopted from Canada over the last three years. It is time to stop the experiment and prohibit black bear snaring. Proposal # 127 is well done and should be adopted.

Thank you for your time in considering my views.

Sincerely,



Patricia O'Brien



December 27, 2011

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

Dear Game Board members:

My name is Timothy Sell. I am an active falconer in Alaska and have been since 1985. I volunteered for several seasons for the non-game section of ADF&G doing raptor surveys in the northwestern part of the state and in Prince William Sound after the 1989 oil spill. All volunteer.

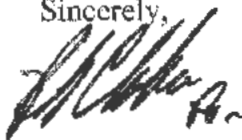
Thank you for the chance to comment on the current falconry proposals before you, the Alaska Falconers Association's version, #38 and the State's version #39. I would prefer the #38 version. It is better thought out, having gone through many rewrites, and has been approved as meeting the standards set by the USF&WS. The state's version was hastily put together and turned in late (12/2011). The state's has a lot of errors and is in question as to whether or not it could actually pass the USF&WS's minimum standards.

Falconry has been overregulated for many years. Time and time again everyone has agreed that we as falconers have no impact on either the raptor populations we acquire hunting partners from or the prey population that we pursue. Overregulation loads the AGF&G with more paper work for no reason. Let's streamline the regulations! Please approve #38.

On proposal #40, I would prefer that this subject be broached at a later date. I do believe that a nonresident take on Alaskan raptors will eventually be a good idea, but we have enough on our plates with the revised falconry regulations. Let's approach this at a later date.

Thanks very much and good luck with your hectic schedule.

Sincerely,



Tim Sell
1441 Rocky Road
Anchorage, AK 99516
907-242-8654



VALESA LINNEAN

Associate Broker, CRS, e-PRO

Cliff Judkins, Chairman, and all Members
Alaska Board of Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
Fax: (907) 465-6094

Dear Chairman Judkins and Members of the Alaska Board of Game,

As a life long Alaskan and a falconer for nearly 20 years, I wanted to write to you regarding the AFA (Alaska Falconer's Association) proposal #38. This has been carefully constructed and reviewed by many who are active in the ancient and historical art of falconry in this state, and it is a biologically sound proposal. I have been a very active falconer, successfully hunting geese with gyrfalcons as well as hunting hares and ducks with goshawks, so I understand exactly what is at stake with this proposal.

Many more raptors are killed each year – by illegal shooting, accidental trapping, vehicle collisions, window strikes, and power line accidents, to name a few – than are taken by falconers in Alaska in ten years. Yet, falconry is the activity restricted by extensive and complex regulations. There are so few of us that this ancient art is in danger of dying out.



As one of the very few female falconers in Alaska, I strongly support proposal #38, and I want to respectfully ask you to consider and adopt proposal #38 as written.

Thank you for taking the time to consider my request.

Sincerely,

Valesa V. Linnean

(907) 865-6440 • AKRealEstateGuide.com • email: homes@valesa.com

   101 W. Benson Blvd. Ste 503 Anchorage, Alaska 99503


KELLER WILLIAMS
REALTY

ALASKA GROUP
Each office independently owned and operated



8685 Dudley Street
Juneau, AK 99801
December 30, 2011

RECEIVED
DEC 30 2011
BOARDS

Alaska Board of Game
Board Support Section
P.O. Box 15526
Juneau, AK 99811-5526

Dear Chairman Judkins and Board Members:

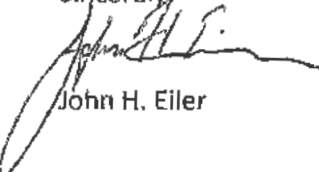
Thank you for the opportunity to comment on the proposed Alaska falconry regulations. I respectfully request that you adopt Proposal 38 in its entirety, and reject Proposal 39 and Proposal 40. Proposal 38 was developed by the Alaska Falconry Association (AFA) based on extensive discussions with falconers throughout the state (representing years of collective experience) and discussions with state and federal biologists. In addition to being sportsmen, Alaska falconers are very concern about the health and stability of wild raptor populations. The AFA proposal establishes sound guidelines for the practice of falconry that also incorporate sound conservation principles. The U.S. Fish and Wildlife Service has reviewed and determined that Proposal 38 meets their minimum requirements.

Proposal 38 is similar in many respects to the position taken by the Alaska Department of Fish and Game ("Department"). Some minor differences exist. Proposal 38 includes 1) an extended list of species approved for falconry that mirrors federal guidelines, 2) elimination of annual reports, and 3) accepting behavioral "sterilization" of non-indigenous goshawk subspecies (requiring these individuals to be imprinted on humans). With regards to the first item, there is no reason to prohibit falconers from flying raptor species native to Alaska that are allowed by federal regulations. The impact on raptor populations by falconry is negligible, and the AFA would be the first to support restrictions if raptor populations were threatened. Second, the annual report requirement is redundant, since falconers are required to file federal forms (Form 3-186A) whenever a bird is acquired, lost, or transferred. If this element is important to the Department, simplifying the process (for example, making it possible to submit reports electronically) would be acceptable. Finally, although the threat of invasive species is an important issue, requiring non-indigenous goshawk subspecies to be human imprints would address this concern without the problems and potential dangers associated with surgical sterilization.

I have lived in Alaska since 1982, and have been involved with birds of prey and falconry since the mid-1970s. I have degrees in wildlife biology (B.S., University of Montana 1976; M.S., University of Tennessee 1981), and have over 30 years experience as a research biologist. In addition to falconry, I have also worked on raptor field studies, assisted with raptor rehabilitation, and given educational presentations to school and adult groups on birds of prey. Please contact me (Phone: 789-5053, email: eiler4@alaska.net) if you need additional information.

Thank you for considering this request. I appreciate the time and effort you devote to providing sound wildlife regulations within Alaska.

Sincerely,



John H. Eiler



TO: Alaska Board of Game, Boards Support Section

P.O. Box 115526

Juneau, AK 99811-5526

Dear Chairman and members of the Board of Game,

RECEIVED
DEC 30 2011
BOARD

Prop 36 – Support 15C and 15A wolf control

Moose populations are currently struggling on the Kenai Peninsula. Bull:cow ratios are extremely low, as of fall 2010 the ratio was reported as 9:100. Wolves are very hard on bulls after the rut when they are weak from not eating for nearly a month. Especially with bulls on the Kenai Peninsula that are probably going to be even more stressed due to the fact that there are more cows per bull than there should be, so that means more cows will go through the first rut un-bred. Leading to bulls trying to breed more cows in November and December when they need to be eating and replenishing their fat stores. This fact along with a flourishing wolf population on the Kenai Peninsula has led to what I believe is low winter survival of the mature breeding bulls. With the mature bull population already very low, more wolves need to be taken out of the population in order to increase winter survival of bulls and improve the low bull:cow ratio.

Calf:cow ratios are also much lower than they should be; probably due partially to the low bull:cow ratio causing more cows to not get bred, but also due to high brown bear and black bear populations along with healthy wolf populations. Due to high calf predation in the spring from bears, more of the yearling calves need to be saved in the winter to increase calf recruitment and increase bull:cow ratios. Calf:cow ratios in fall 2010 in the Caribou Hills survey area in 15C were reported as 5:100. This is terrible and is impossible to have a growing or healthy moose population from ratios that bad. Since calf:cow ratios are so poor more adult cow moose need to be saved so that they can survive annually and be around to produce more calves.

Hunters sacrificed the amount of bulls harvested dramatically from an average of over 200 the previous 5 years to a preliminary harvest of 12 bulls in 15C this year. It is not fair to reallocate moose from human harvest so more can be eaten by wolves and bears. It is time to



reduce the wolf population and also the bear populations on the Kenai Peninsula in order to have healthy moose populations.

Prop 258 – Support Registration brown bear

The brown bear population has continually increased over the last 15 years due to lack of any substantial brown bear hunting seasons and harvest opportunity. 2010 fall calf to cow ratios in the Caribou Hills, a remote portion of 15C was reported as 5:100. This year I flew this area 3 times during the fall trying to look for moose and get a feel for the population to see if any of these ratios will change from what was reported from Fish and Game aerial surveys in 2010. From what I saw I don't expect bull:cow ratios or calf:cow ratios to improve by any substantial amount, if at all. Flying on the dates Sept. 2nd and Sept. 8th I can say that I saw anywhere from 50 to 70 cows on both of those days and the highest amount of calves I counted on one of those days was 3. Representing a calf:cow ratio that is approximately one calf per 20 cows, which is about the same ratio as fall 2010. In 10 days of hunting this area covering a lot of ground with both binoculars and on a horse I never did see a single calf. Ratios this low will not support a growing or healthy moose population.

Flying the area a third time after moose hunting season on Sept. 27th I saw approximately 30 cows this day and only one cow had a calf with it, and this cow and calf were getting chased by a large brown bear. The pilot and I circled for about 10 minutes while this brown bear pursued this calf and showed no signs of giving up on his mission of bringing down the calf when we left the area.

Low bull:cow ratios are probably influencing calf:cow ratios, but I don't believe this impact is near as big as the impact of brown bear predation on moose calves. My reasoning for this is the fact that along the main highway and near populated areas I would estimate the calf to cow ratio as probably 1 calf to 3 cows, and a fair amount of these cows have twin calves. Back in the Caribou Hills and other remote areas that are away from human populations there are hardly any calves. Twin calves are almost nonexistent in these areas and seeing a cow with a calf is a surprise, because the overwhelming majority of cows don't have a calf with them. If it wasn't for brown and black bear predation the calf:cow ratios should be close to matching between remote areas and areas closer to human populations. Especially since there are more mature breeding



bulls in the remote areas meaning that a higher portion of the cows should be getting bred in these areas than those areas closer to human populations.

Over the last 10 years the overwhelming majority of the bear harvest has occurred around the highways and human population centers because of DLP's and hunting opportunities offered. This is likely why calves are surviving better in these areas because bears are actually being removed from the population and therefore bear concentrations are not as high. Bear concentrations in remote areas like the Caribou Hills, Tustumena Lake, Skilak Lake, and Resurrection Pass areas are much higher because of lack of hunting opportunities in these areas and reduced incidence of DLP's. Calf survival is pitiful in these areas and the only way to increase calf survival is to get an adequate brown bear hunt. The current draw permit hunt has not done a good enough job of harvesting brown bears in these areas due to lack of permits offered. 3 permits are awarded each year for the Tustumena Lake and Tustumena Ridge areas, and the portion of the KNWR that extends into 15C (DB307). This would be the best brown bear hunting area on the Kenai Peninsula, but due to lack of hunting opportunities bear harvest has been none to minimal at best. Over the course of the last 2 falls while moose hunting I have seen 15 brown bears on the ground in the DB307 hunting area, but due to lack of hunting opportunities offered I can't ever get a permit to harvest one of these brown bears. **Something must be done** other than the current draw hunt in order to increase brown bear harvest, and therefore increase calf survival. Healthy moose populations **will not be** obtained by wolf control only, the increasing brown bear population on the Kenai Peninsula needs to be addressed or we may not see anything but the current antler restrictions for a long time on the Kenai Peninsula.

Prop 84 – Support as Amended

Residents sheep season --- Aug. 10th – Sept 20th

Nonresident sheep season – Aug. 12th – Sept 20th

Currently there is very little Alaskan resident preference when it comes to sheep hunting when compared to other game animals such as moose, caribou, black bear, and brown bear to name a few. This has led to nonresidents harvesting about 40 percent of the annual take of Dall rams in Alaska and in some areas higher than 50 percent of the annual take of rams. The only areas that show a residential preference are the areas that have gone to draw hunts and offer more



resident tags than nonresident tags. Residential preference for sheep hunting should mirror more closely to other big game species in Alaska like moose and caribou.

If the board feels that Prop. 88 is not the best way to address the growing take of nonresident sheep harvest and the fact that residents are being crowded out of certain areas by high amounts of guides **then** prop. 84 is a good solution to give a residential preference for sheep. I don't like the idea of extending sheep season but would rather see nonresident seasons start two days later on Aug. 12. Where as resident hunters would get the chance to start on the current date of August 10th.

Prop 88 – Support

Currently nonresidents are taking about 40 percent of the annual take of Dall rams in Alaska. This seems unfair to resident hunters to not offer them a residential preference for sheep hunting as seen in other Alaskan big game species seasons, bag limits, antler restrictions, etc. The 14A/13D GMU's going to draw hunts is a good example of what can happen if actions are not taken in appropriate timing. People were complaining about high sheep harvest and overcrowding between heavy guide use and resident hunters, and nothing was done until the area needed to go to draw hunts. Currently many of Alaska's sheep mountains are open for general harvest tickets and should remain this way as long as possible. Heavy guiding activity along with resident pressure has led to certain areas seeing a decrease in mature full-curl rams on the mountain. An unlimited number of nonresidents can hunt in Alaska as long as they hire a guide, and this system seems to not be working because too many full curl rams are being harvested and residents are being forced out of productive areas by heavy guiding activity. Some areas with heavy guiding are even seeing nonresidents take more than 50 percent of the annual harvest of rams. This doesn't seem right to offer nonresidents such an advantage by allowing them to go with a guide that can stake out a good area, scout it, and keep air transporters from dropping resident hunters off in that area.

It is time for the BOG to address the high rate of nonresident harvest of rams and the overcrowding of hunters occurring in certain areas before it is too late and more of Alaska goes to draw hunts for sheep. There is new information being circulated that half of "age-legal" rams



are left on the mountain after each sheep season. The data collection and conclusions behind this theory is suspect to me, and the misleading part of this information is the fact that counting annuli on rams is dangerous and can lead to a higher chance of taking an illegal ram by trying to count annuli through a spotting scope or binoculars. It is much easier to tell full curl or broomed tips through optics and therefore nearly every resident hunter is going to look for these trophy attributes. Many hunters are reporting decreasing amounts of full curl rams in different areas of Alaska and this should be addressed before more areas of Alaska goes to draw hunts for sheep.

Nonresidents should be the first out of the pool of hunters to take the hit before it is too late. 10 percent of the historical amount of hunters in a specific GMU will still allow for many nonresident hunters to continue hunting in Alaska, will keep many guide outfits still in good financial shape, and will still allow for nonresidents to take a good share of the portion of rams in Alaska. This proposal will help address overcrowding of hunters, competition between resident hunters and guides, decreasing populations of full curl rams, and address the lack of residential preference when it comes to sheep hunting in Alaska. Nonresidents taking 40 percent of the annual harvest of rams is unacceptable in my opinion and the opinion of many other Alaskan hunters.

Prop 86 – Oppose

This proposal will likely turn into adults taking their kids so that the adults themselves can get a jump on everyone else, and then will likely shoot the sheep themselves rather than the actual youth hunter.

Prop 91 – Oppose

A nonresident is a nonresident. Alaska already caters to the nonresident sheep hunter more than enough. Nonresidents harvest around 40 percent of the rams in Alaska, which is already a high percentage. Resident sheep draw hunts already have low enough odds, most if not all are below a 5 percent chance of drawing and this would just reduce that chance.



Prop 63 – Oppose

I oppose allowing an opportunity of 6 draw hunts per species for all animals. Some animals such as sheep, caribou, certain bull moose hunts, etc. already have low enough draw odds. Increasing the number of hunts per species a person can apply for will only decrease these small draw odds and make many draw hunts almost impossible to win a permit.

The only way I would support this proposal is if a person applying for hunts could apply for 6 different draw hunts for moose so long as only a maximum of 3 draw permits were allowed for bull moose hunts. Meaning that the person could use the other 3 hunt choices to apply for cow hunts if they choose, which was the author's intent was to allow more entries to meet the increasing opportunities for cow moose permits so these hunts wouldn't go undersubscribed.

Support only as amended

For moose draw hunts **only** a person is allowed to apply for **Six** [three] different hunt numbers, **as long as** only a maximum of three of these hunt choices are allowed for bull moose draw hunts.

Prop 65 – Support

By limiting winners to no more than two different permits, it would increase odds for other people to win a draw permit. Draw odds in Alaska are already extremely low in many hunts and by limiting multiple hunt winners it will allow more people to successfully win a draw hunt.

Prop 73 and 74 – Oppose

No need for a special resident season because for many species such as moose and caribou a resident preference is already in place through special seasons, bag limits, more liberal antler restrictions, and etc. The only species that doesn't have an identifiable Alaskan resident preference is Dall Sheep, and this should change. There should be some kind of identifiable resident preference for Dall Sheep.



Prop 102 – Support

Prop 118 – Support

Can't hurt things or make regulations harder to understand, could give bear baiters a back-up source of identification if their sign gets ripped off by a bear.

Thanks for reading and giving any consideration to my recommendations on some of the proposals.

Sincerely,

Brian Blossom



12/30/2011

ATTN: Board of Game Comments
Alaska DF&G
Boards Support Section
P O Box 115526
Juneau, AK 99811-5526

Dear Board of Game:

I wrote to you in October 2011 and presented my reasons for being **VERY OPPOSED TO PROPOSALS 35 and 36.**

I urge you again to oppose 35 and 36.

As Rich Sinnott, the retired state wildlife biologist says, Alaska appears to the world as a practitioner of aerial wolf killing in a medieval, non scientific way: "Kill as many as you can." And to me it appears that the special interest commercial hunting organizations are the ones who benefit. Clearly a small powerful subset of the Alaskan population reaps financial rewards from their hunting clients, while us regular Alaskans shake our heads and hearts in disbelief at the so-called rationale for these killing ways. The aerial wolf killing is expanding to new parts of the state, and it is documented that the mass killing is clearly not based on science and research. Instead special interests are promoting their financial gain. This self-serving attitude harms the health and integrity of our ecosystems.

Research by ADF&G clearly shows that the moose in GMU 15A are suffering from lack of food. Killing the wolves will not increase browse food for the moose. There is a habitat problem not a wolf problem. But it is easy to blame the wolves, and it gives beginner hunters new target practice venues. Additionally, research shows that 15A has a huge hare population, and the wolves primarily eat hares. Killing the wolves will allow the hares to eat the willows, and the moose need those tasty willows for their survival. Same for GMU 15C, aerial wolf killing is not well thought out since these moose will also have food scarcity.

I also strongly support Proposals 43 and 127.

Proposal 43: Recent research indicates the very positive role that beavers play in creating healthy ecosystems for fish, birds and other wildlife. This was not clearly known before. Therefore it is important to update the regulations regarding the trapping of so-called nuisance beavers. Many dedicated Juneau people worked on a several year project that made important discoveries. Biologists and other scientists were part of the Beaver Patrol. ADF&G appreciated the hard work and research on beavers. **Thank you for your Yes vote on this proposal.**



l.

Proposal 127: It is extremely important to prohibit the unnecessary, unscientific and inhumane practice of snaring bears. Our ability to have healthy bear populations is endangered by this cruel practice. This non-sportsmanlike practice is expanding, and it gives all Alaskans a black eye for animal abuse and waging war on wildlife. Thank you for your Yes vote.

Thank you for opposing 35 and 36 and supporting 43 and 127.

Politics, not sound science and research, controls the aerial killing of wolves and snaring of bears. These practices are expanding despite more evidence that many of the game management units lack enough moose food to support additional moose. Plus many areas have not had effective or accurate moose census reports, and some preliminary moose data indicates that other GMU's already have their target number of moose and no predator control is needed. The headlong rush into aerial killing and snaring is revealed as poorly thought out.

Thank you very much for considering these points.

Sincerely,



Lin G. Davis
3099 Nowell Ave
Juneau, AK 99801



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.

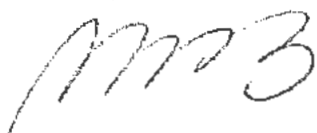
Also I am concerned that 35 and 36 have not been carefully thought out. If the moose populations are not declining in Unit 15c, why kill the wolves? If the reason for moose decline in Unit 15a is poor habitat, why kill the wolves? Apparently prior hunters over-harvested bull moose and that may be why 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 unpractical.

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



maureen Longworth

From: Lin Davis [molin@gci.net]
Sent: Friday, October 28, 2011 12:01 PM
To: info@akwildlife.org
Cc: Maureen Longworth; Maureen Longworth
Subject: Strongly oppose Proposals 35 and 36

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
Sent from my iPad



Roy & Charlene Huhndorf
PO Box 39248
Ninilchik, AK 99639
PH. (907) 567-3568
Email royhuhndorf@aol.com

December 30, 2011

Alaska Board of Game
Boards Support Section
PO Box 115526
Juneau, AK 99811-5526

SENT BY FAX to (907) 465-6094

Dear Members of the Board:

We are life long residents of Alaska and recent transplants to the Kenai Peninsula. We are not animal rights extremists as we believe in and have participated in fishing and hunting for food. We love and appreciate Alaska, its natural beauty and its plethora of wildlife.....all kinds. We sincerely hope you vote NOT to allow aerial wolf hunting on the Kenai Peninsula.

We have observed over the years the decline in the moose population but do not believe that wolves are the primary cause. While it is true that wolves take moose and bears take even more, we believe that overhunting, poaching, and car collisions cause an enormous rise in moose mortality. The last time we noticed, the road signs reporting moose/car collisions for the year on the Peninsula indicated the number was approaching 300! According to conversations we hear, poaching is rampant. If there is a critical shortage of an Alaskan animal, hunting should be allowed ONLY for Alaska residents and ONLY for food until the numbers rise to an acceptable level.

Alaska's wildlife is here for ALL of us....not just hunters. As you are all aware, the number of residents and tourists who travel the state to photograph animals and enjoy the privilege of watching them in their natural habitat is growing and will continue to grow. It is a huge industry in Alaska now and will get bigger every year.....unless you manage the "resource" only for hunters. It is unfortunate that the board membership does not reflect the large number of Alaskans who hunt with their cameras. Is there even one seat dedicated to that population?

Reflector lights were recently installed on the road near Ninilchik to help drivers see moose at night. They work. Last summer road crews removed trees and underbrush for a considerable distance on either side of the road so drivers could be aware of moose browsing near the road. It works. Please increase those projects and attempt to come up with other solutions before you allow the destruction of wolves from the air. It would be a travesty.

Thank you for your consideration of our comments.

Sincerely,



Roy Huhndorf

Charlene Huhndorf





BACKCOUNTRY HUNTERS AND ANGLERS ALASKA CHAPTER



AK BHA

www.alaskabackcountryhunters.org

December 29, 2011

Comments to the Alaska Board of Game
Statewide Regulations, Cycle B Schedule
January 13-17, 2012

Proposals we support – 53, 55, 88

Proposals we oppose – 44, 50, 113, 125

Proposal 44 – 5AAC 92.052 Discretionary permit hunt conditions and procedures.

OPPOSE

We oppose allowing the recipients of Governor's tags for any species having their own special season or any modifications to the methods and means allowed in the general hunting regulations. We are specifically concerned with the authority to change the methods and means allowed for hunting a Governor's tag.

It's a very slippery slope and we don't want to see special treatment given to the wealthier hunters who can bid on these Governor's tags. We don't need more division within the hunting ranks. Stick with the seasons and methods and means all hunters must abide by for each specific hunt.

Proposal 50 – 5 AAC 92.052 Discretionary permit hunt conditions and procedures.

OPPOSE



We strongly oppose taking away the discretionary authority of the Department to manage permit hunts in ways designed to protect the resource. We can see no logical rationale for the Board to propose this.

Proposal 53 – 5 AAC 92.085. Unlawful methods of taking big game; exceptions. And proposal 55 – 5 AAC 92.990. Definitions

SUPPORT

We fully support minimum standards for crossbows used for hunting big game, as outlined in proposal 53. We also support a regulatory definition of crossbows per proposal 55

Proposal 88 – 5 AAC, Chapter 85. Seasons and bag limits.

SUPPORT

We support the intent of proposal 88. Currently, Alaska Backcountry Hunters & Anglers has a similar proposal (Proposal 137) before the Board for the March 2012 Region III meeting. We refer you to that proposal for our position and rationale.

Proposal 113 – 5 AAC 92.135. Transfer of Possession.

OPPOSE

Alaska Wildlife Troopers and federal law enforcement officers often work together, and depend on one another, to enforce our fish and game laws. And in fact, the state of Alaska offers a course to federal officers whereby they can enforce our fish and game laws outside federal lands, and many federal officers have that dual enforcement authority.

Attempting to revoke federal authority to enforce our fish and game laws may be a popular populist notion, but in the end it hurts the overall enforcement of our fish and game laws.

Proposal 125 – 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.

OPPOSE

There are many reasons why a mandated 72 hour trap check time are unwarranted, dangerous, and imprudent, but as we were told that this proposal was pulled by the National Parks Conservation Association we won't go into the rationale of our opposition. However, since it is in the published proposal book we wanted to make clear we strongly oppose this proposal.

Thank you for the opportunity to comment and for your service to all Alaskans.

Alaska chapter Backcountry Hunters & Anglers – AK BHA
Mark Richards – Co-chair
Dave Lyon – Co-chair
www.alaskabackcountryhunters.org
alaskabha@starband.net



THE ALASKA WILDLIFE ALLIANCE
LETTING NATURE RUN WILD

December 30, 2011

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

Hand-delivered to Anchorage ADF&G

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 meeting for **Statewide Regulations**, January 13 -17, 2012 in Anchorage.

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,

Connie Brandel
Office Manager

RECEIVED

DEC 30 2011

BOARDS
ANCHORAGE

Attn: Scott Cross
Public Comments
BOG Statewide 2012



**AWA's Comments on the Alaska Board of Game Proposals
Statewide Meeting**

(Missing proposal numbers indicate "no comment")

**PROPOSAL
#**

COMMENT

35, 36

OPPOSE At present, there is no scientific justification for predator control in GMUs 15A and 15B. At the very least, the ability of the areas involved to provide sufficient nutrition for increased moose populations, the objective of this Intensive Management suggestion, is highly questionable. Data from ADF&G as of March, 2011, strongly indicates the areas under question are probably incapable of further support for greater moose numbers. Additionally, the regional ADF&G biologist has expressed doubts such a program would be viable due to regulations regarding national refuge lands and Intensive Management in 15A.

Additionally, by holding these proposal hearings so distant from the area under consideration, the Board of Game is purposefully inhibiting possibly useful commentary by residents of 15A and 15C. There is no justification whatsoever for such an action on the Board's part.

43

SUPPORT This proposal calls for a review and modification of nuisance beaver permits to allow the use of beaver flow devices.

The current regulation was last updated in 1989, and is based upon outdated information. Since 1989, scientific research has proven that beavers are a part of healthy ecosystems. Allowing the use of beaver flow devices provides an alternative to removing and/or killing beavers, thus allowing them to continue to contribute their benefits to fisheries and wildlife habitat.

This proposal does not call for the elimination of other options, but instead provides a new option that is inexpensive, easy to use, and beneficial.

285



48 **SUPPORT** Failure of this proposal will create an egregious scenario given the long history of prohibition against the sale of bear parts in Alaska. Given the prolific nature of the illegal trade in bear gall bladders, this proposal would close an avenue by which illegally obtained bladders would become salable. If it is not approved, the increase in poaching would be both predictable and widespread.

94 **SUPPORT** The quality of pelts at this time of the year is questionable, and denning is also taking place. To bring such intense pressure on breeding pairs it is unwarranted as is the possible lack of value to their furs. Such a proposal could easily lead to wasted resources.

97 **SUPPORT** Use of lights to "jacklight" wildlife for hunting purposes goes against the very heart of fair hunting practices and suggests how little ethics would play a part in the activity if it is allowed.

108 **SUPPORT** The unwarranted destruction by one action of two generations of bears is unconscionable and without any scientific merit. NPS lands should act as refuges for wildlife, not killing fields to satisfy a few unethical hunters.

109 **OPPOSE** This proposal calls for standardizations of black bear seasons and bag limits that would result in (1) no closed season for much of the state; (2) an increase in the statewide bag limit for black bear; (3) no bag limit for all intensive management areas in which black bears are viewed as contributing to the decline of a prey species. No hard data are presented to substantiate these recommendations.

The recommended standardizations disregard the fact that the state of Alaska, approximately one-fifth the size of the continental US, consists of many different ecosystems that require different types of wildlife management techniques, and the residents and visitors in these areas have different needs. Additionally, different areas of Alaska have different levels of hard data that must be taken into account when managing wildlife.

Harvesting of black bears at times when cubs are dependent upon sows is an example of poor wildlife management.

We are concerned that the Greater Alaska Black Bear

AWA

3 of 5



Committee does not identify itself. Who are the members? Whom do they represent? What type of organization is this? The BOG process is public.

118 **SUPPORT** sections 1A, 1B, and 7
OPPOSE sections 4, 10, and 13.

This proposal calls for the clarification and modification of the permit for hunting black bears with the use of bait and scent lures.

Because we support the clarification of regulations when it promotes wildlife conservation and/or improved law enforcement, we **SUPPORT** sections 1A, 1B, and 7 of this proposal.

Because we oppose bear baiting, we **OPPOSE** sections 4, 10, and 13 of this proposal. Bear baiting is a tremendously controversial practice that many Alaskans oppose. It violates the principles of fair chase and endangers members of the public who happen upon bears habituated to human food from baiting stations.

120 **OPPOSE** This proposal calls for the elimination of the requirement of a predator control permit for black bear baiting in predator control areas.

As stated in our comments for Proposal 118, bear baiting is a highly controversial practice that many Alaskans oppose. It violates the principles of fair chase and endangers members of the public who happen upon bears habituated to human food from baiting stations.

121 **SUPPORT** The purpose of NPS land should not be chiefly that of providing consumptive uses over all other concerns. Bear baiting represents a danger to non-consumptive users, the vast majority of people apt to travel these areas. Enough of Alaska is open to this questionable activity without exposing NPS lands to it as well.

127 **SUPPORT** This proposal calls for a prohibition of the taking of black bears by trap or snare, but there are no studies to support that an increased take of black bears results in more moose, and there is no hard evidence proving that black bear trapping/snaring provides more moose to harvest.

4 of 5



Trapping/snaring bears requires bait stations, and as stated in our comments to Proposals 118 and 120, we oppose bait stations. This method of take does not adhere to principles of fair chase and is extremely controversial among Alaskans.

Trapping/snaring bears is a safety concern to the public and to other unintended victims.

Permitting a black bear trapping season near national parks & preserves endangers bear populations in those parks and preserves.

Wildlife tourism is a large and growing industry that must be considered in wildlife management decisions. Many tourists come to Alaska to view wildlife and many Alaskans make a living by providing opportunities to view wildlife. The State Constitution states that Alaska's wildlife belongs to ALL Alaskans.

Bear snares target all bears, including sows with cubs, bear cubs, and brown bears. This is poor wildlife management. Additionally, bear snares do not just snare bears; they are as indiscriminate with other wildlife as they are with bears.

Bear snares also pose a public safety hazard when allowed within 1/4 mile from residences, roads, and trails, particularly since the public cannot know where bear snaring is occurring.

130

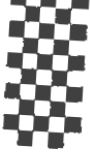
OPPOSE This proposal seeks to authorize a brown bear predator control program in unit 26B to reduce predation on muskoxen. This contradicts the reasons for which the Arctic Refuge was established by ANILCA; brown bears in the refuge are to be maintained in their natural diversity. It also appears that this population does not even qualify for Intensive Management.

Additionally, the BOG has not set up population and harvest objectives for these muskoxen; in fact, a population assessment has not yet been completed and until the causes of the herd's decline have been discovered, no action can reasonably be taken. For example, climate change, disease, and parasites could be major factors in the herd's decline.

###

585





PROPOSAL 114-5AAC92.044

PERMIT FOR HUNTING BLACK BEAR WITH THE USE OF BAIT OR SCENT LURES

RECEIVED
DEC 19 2011

STRONGLY IN FAVOR OF THIS PROPOSAL

Why

I HAVE A CABIN IN UNIT 20A ACCESSABLE ONLY BY AIR AND HAVE BLACK BEAR ^{HUNTING} OVER BAIT THEIR FOR YEARS. BECAUSE THOSE OF US THAT MUST WORK A 5-DAY WORK WEEK HAVE NEEDLESLY ^{BEEN} RESTRICTED FOR YEARS TO A VERY SMALL WINDOW OF HUNTING OPPORTUNITY, NOT TO MENTION THE FACT THAT POOR FLYING CONDITIONS ALSO CONTRIBUTE TO LOSS OF EVEN MORE HUNTING TIME.

PASSING THIS PROPOSAL WOULD BROADEN HUNTING OPPORTUNITIES AND WOULD NOT EFFECT ANY BODY.

JOE ZAPOTOSKY
P.O BOX 55033
NORTH POLE, AK 99705
907-488-6724 (H)
907-451-1259 (W)

RECEIVED TIME DEC. 19. 1:17PM

PRINT TIME DEC. 19. 1:18PM



RECEIVED

DEC 29 2011

Al Barrette

380 Peger Rd.

Fairbanks, AK. 99709

452-6047

BOG COMMENTS STATEWIDE MEETING 13-17 JAN, 2011

Proposal 49 Do not adopt.

This proposal has many allegations, complications and question to be answered.

ALLEGATIONS

AWT has alleged that a minority of taxidermists/tanneries is involved in illegal actives, and that not having the authority to inspect records without the permission of the owner hiders and investigation, and prolongs illegal active.

But AWT has not shown one example of this. Instead they gave 2 examples of how and investigation did work and warrants were used. 1 example of how concern individuals contacted AWT and AWT was able to pursue tips and found out that a particular individual was found not to have a required taxidermy license. Another example was of clearly just a civil issue. The last was unfounded allegations. AWT never cited any wrong doing on the part of taxidermist.

None of these example provide a time frame of how often violations occur within the taxidermy industry. And does not address how this regulation would have prevented such illegal active. I will concede though it may have helped in the civil matters. But AWT is not on any regular bases getting involved in civil issues. Nor do I believe they will, or want to.

If this proposed regulation is as important to them as they pertain it to be. They would have shown clear cut examples of why they needed this, and how often this has been needed. And how many times a business was able to conduct illegal actives and because they could not inspect records AWT was not able to prosecute the taxidermist.

COMPLICATIONS

According to the memorandum from legislative legal it was their opinion that the BOG would have to tie all the regulations pertaining to game to the industry of taxidermy. In my opinion this who would be a very hard task, if even possible.

The Board of Game's main role is to conserve and develop Alaska's wildlife resources. This includes establishing open and closed seasons, areas for taking game, setting bag limits; and regulating methods and means. The board is also involved with setting policy and direction for the management of the state's wildlife resources. The board is charged with making allocative decisions, and the Department of Fish and Game is responsible for management based on those decisions.



AWT and others have alleged that the taxidermy industry is like commercial fish, the guiding industry, and charter operations. This is not an accurate comparison. Unlike all these industries that have been mentioned. They receive allocations from the appropriate boards. ie. Commercial fish receives an allocation of fish, and special seasons and gear restrictions and are allow to sell the state's resource. The guiding industry receives allocations of permits, and are allowed to sell a hunt for an opportunity to harvest/take a state resource. The same for fish charters, they provide transportation to the resource for an opportunity to take a state resource, and all of these industries could impact the resource, and commercial fishing has in the past impacted the state's resource.

None of this is true of the taxidermy industry. The facts are, the business of taxidermy is not allocated any resources, have no special seasons, cannot take or guide anyone under a taxidermy license. Also the industry of taxidermy could never impact the resource. This is valid because there are less than 100 licensed taxidermists in the state, and it would take the entire industry to be corrupt to do so. The only action the BOG has taken on the industry of taxidermy is to allow the sale of prepared trophies. They gave the industry a way to recoup the cost of a game trophy that a customer has not completed a contact. The BOG had made this provision only because we have a regulation that prohibits the sale of prepared trophies for all Alaskans.

According to the Division of Occupations and Licensing. The agency who issues the license is in control of the license. And if any conditions need to be added or removed from that license it is the responsible of the issuing agency. The BOG has never issued one taxidermy license. Nor can they currently.

QUESTIONS THAT TO BE ANSWERED.

1. What is a trophy? This is used in the statue definition of Taxidermy. (As a trophy is the key wording)

(35) "taxidermy" means tanning, mounting, processing, or other treatment or preparation of fish or game, or any part of fish or game, as a trophy, for monetary gain, including the receiving of the fish or game or parts of fish or game for such purposes;

The BOG has defined what a trophy is.

(42) "trophy" means a mount of a big game animal, including the skin of the head (cape) or the entire skin, in a lifelike representation of the animal, including a lifelike representation made from any part of a big game animal; "trophy" also includes a "European mount" in which the horns or antlers and the skull or a portion of the skull are mounted for display;

Since the state has no definition (other than the common use of the word) of trophy and the BOG used their authority to define what a trophy is. One could make the conclusion that only a person who dose taxidermy/tanning to big game is in need of a taxidermy license. If this is true, AWT's proposed language will have to be changed to reflect this. And or the BOG will have to make or amend a definition or definitions to reflect the intent of the proposer. Or it may take legislations.

2. "As a trophy" again. If a tannery were only tanning skins that are used for skin sewing or crafts would an individual need this license?



3. AWT has contradicted themselves in the proposed language. They are asking to inspect for compliance of this section.

(e) Department of Public Safety is authorized to conduct inspections for compliance with this section during normal business hours or between 9 a.m. to 5 p.m.

That suggests making sure that the taxidermist has recorded all the information correctly and maintain it for the required time. But in AWT's newest amended proposal they state their clear intent.

If passed, this regulation will provide AWT with a tool to inspect records kept by a taxidermist which reflect the game they possess for taxidermy purposes. The ability to inspect these records will allow AWT to look for specific animals that AWT suspects have been taken illegally and document that they are located at the taxidermy shop so we can take additional investigative steps.

So it is very clear to me. That the proposed language only allows for an inspection of compliance of record keeping, but AWT is saying they are also searching for specific persons and or game.

4. How will AWT know taxidermist generated a receipt and retained it? The only way this could happen is AWT will have sting operations or try to set up taxidermists. To see if they are really stored records for the required amount of time.

5. Currently a taxidermist has the right to refuse and inspection by AWT without a warrant. Where does the right come from? The Alaskan Constitution. Specifically Article 1 sec. 14

- **Searches and Seizures.**

The right of the people to be secure in their persons, houses and other property, papers, and effects, against unreasonable searches and seizures, shall not be violated. No warrants shall issue, but upon probable cause, supported by oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized.

This is the commentary out of a "citizen's guide" that most all legislators have and use. That reflects the above constitutional rights of Alaskans.

Here is the search-and-seizure article of the U.S. Bill of Rights (Article IV), with the addition of the words "and other property" and altered punctuation. Although this constitutional protection has at times resulted in popular outrage when felons have gone free because evidence of their guilt was obtained illegally by the police, it is one of the bulwarks of personal freedom. People living under totalitarian regimes who fear a knock on the door in the middle of the night readily grasp its significance. "The primary purpose of the constitutional guarantees furnished by this section is the protection of personal privacy and dignity against unwarranted intrusion by the state" (Woods & Rohde, Incorporated v. State, 565 P.2d 138, 1977).



Many criminals have, not surprisingly, appealed their convictions on the grounds that the evidence used against them violated this constitutional safeguard. Thus, the provision has undergone a great deal of judicial interpretation over the years to define such subjective concepts as “probable cause” (even the meaning of “search” has had to be established) and to balance the practical demands of police work with the underlying principle of personal privacy.

Evidence which has been seized unreasonably may not be used in court. This is the “exclusionary” doctrine that has thwarted many criminal convictions. The doctrine is not meant to protect against conviction of innocent people; it is rather, in the words of the Alaska Supreme Court, “a prophylactic device to curb improper police conduct and to protect the integrity of the judicial process” (*Moreau v. State*, 588 P.2d 275, 1978).

To obtain a search warrant from the court, or to arrest (seize) a criminal suspect, the police must have more than good intentions: the facts and circumstances known to the officer “must be sufficient to warrant a man of reasonable caution to believe that an offense has been or is being committed” (a federal standard cited in numerous state cases, for example *Keller v. State*, 543 P.2d 1211, 1975).

The courts have delineated several exceptions to the general rule that a warrant must be in hand before the police may search a person or a person’s belongings. These exceptions are for a search of abandoned property, a search in hot pursuit of a fleeing felon, a search to avoid destruction of a known seizable item, a limited pre-incarceration “inventory” search, a search undertaken with voluntary consent, a search in the rendition of emergency aid, a “stop and frisk” search, and a search incident to arrest. At the Alaska constitutional convention, the delegates seriously considered, but finally rejected, an additional clause that would have extended this protection from unreasonable searches and seizures to include freedom from electronic surveillance and wiretapping.

In the end, the delegates decided not to risk unnecessary restriction of legitimate law enforcement activities, and they trusted the legislature to establish safeguards against official abuse of electronic surveillance. However, the lingering apprehension of threats to personal privacy from modern technology found expression in the “right to privacy” amendment (Section 22, below) adopted in 1972. This amendment became a partial basis for the Alaska Supreme Court’s adopting a rule requiring police to obtain prior court approval for many electronic monitoring situations (*State v. Glass*, 583 P.2d 872, 1978).

So how can one conclude from the information above that if this proposal would to pass that a taxidermist would not be losing a granted right? Or have to waive that right?

Should a board or agency put a condition of acceptance on a license that an individual will have to decide to voluntarily have to waive his constitutional right so he could make a living?

Article 1 sec. 14 does not give exceptions to persons holding a license that their “personal property” and “papers” are subject to searches/inspections, nor even applies it. In fact it protects those effects.



6, if I am correct in what I have been lead to believe, that the sale of any Alaskan big game "trophy" is illegal to be sold(besides those exception in codified),why do I see countless web sites advertising such sales? Are not these the violators AWT should be concerned with? AWT already states Alaskan taxidermist comply with the laws, with only an exception now and then with no frequency.

7. Does the BOG have the authority to regulate the "business of taxidermy"? The BOG does not regulate any other businesses not even fur dealers. Taxidermists have no more responsible than any other persons to make sure they are not in possession of unsealed, tagged or plugged game outside the legal requirements. Taxidermists have no more responsible than any other persons to knowling be in possession of illegally taken game.

Proposals 38 adopt. But realize that falconers may obtain a permit to catch wild Alaskan birds, breed them and sell them for thousands and or tens of thousands of dollars. Resident or not.

Proposal 46 adopt. This is no new idea. The BOG should discuss when does the game legal harvest become personal property. This is just like the sale of blk. Bears. The presumption that allowing the sale of legally harvest bears would encourage unlawful harvest for profit has been proven wrong so far. Also if the BOG decides to allow the sale of offspring from raptors harvested in the state for an incredible amounts of money. You should really consider the sale of legally harvest "trophies".

Proposals 50 amend and adopt. BOG needs to sit down ADF&G and eliminate any discretional authority that is controversial with the public. As though ADF&G own testimony any condition to a permit that the public may have issue with. The dept. submits a proposal to the BOG to get approval for. This was exactly why the broad had giving them the authority so the dept./BOG would not have address ever condition to permits and create extra paper work for both staffs.

Proposal 51 do not adopt. This is exactly what I was talking about in the prior proposal; the dept. already has the authority to require this. Part (14) the harvest reports already require specific locations.

Proposal 104 do not adopt. This is really over restrictive. Urine purchased comes from deer farms which are certified by state vets. Most Alaskan use the urine only as a cover sent. And little to no use as a lure, in a way that the animal will ingest it. This is a huge industry. I believe if there was any evidence of such a transferal of CWD though commercial urine we would have seen evidence of this in other states.

I also have included some correspondence with AWT. A memorandum from legislative legal. And please take time to research the internet for all the Alaskan trophies for sale outside Alaska.



LEGAL SERVICES

DIVISION OF LEGAL AND RESEARCH SERVICES
LEGISLATIVE AFFAIRS AGENCY
STATE OF ALASKA

(907) 465-3867 or 465-2450
FAX (907) 465-2029
Mail Stop 3101

State Capitol
Juneau, Alaska 99801-1182
Deliveries to: 129 6th St., Rm. 329

MEMORANDUM

February 8, 2011

SUBJECT: Proposed game regulation regarding taxidermy
(Work Order 27-LS0503)

TO: Senator John Coghill
Attn: Josh Banks

FROM: Brian J. Kane
Legislative Counsel

You have asked the following question: Are there any constitutional issues raised with regulations Proposal 220, regarding the Department of Public Safety inspections of taxidermy businesses?

According to the information you have provided, the proposed regulation reads as follows: "Representative of the Department of Public Safety shall have free and unobstructed access to all taxidermy businesses licensed through the department to inspect fish, game, sealing paperwork, and operational compliance with AS 16, AS 08, and regulations promulgated thereunder." It appears that this regulation was modeled after 5 AAC 39.140(a), which gives the Department of Public Safety similar powers relating to fishing vessels, canneries, salteries, and other land-based or floating processing establishments. The regulation found at 5 AAC 39.140 lists AS 16.05.251 and AS 16.05.180 for the statutory authority to implement them. AS 16.05.251 states the general regulatory powers of the Board of Fisheries, but AS 16.05.180 is the statute of interest for your question. That statute states:

Sec. 16.05.180. Power to search without warrant. Each peace officer designated in AS 16.05.150 may without a warrant search any thing or place if the search is reasonable or is not protected from searches and seizures without warrant within the meaning of art. I, sec. 14, Alaska State Constitution, which specifically enumerates "persons, houses and other property, papers and effects." However, before a search without warrant is made a signed written statement by the person making the search shall be submitted to the person in control of the property or object to be searched, stating the reason the search is being conducted. A written receipt shall be given by the person conducting the search for property which is taken as a result of the search. The enumeration of specific things does not limit the meaning of words of a general nature.



AS 16.05.180 was discussed in some detail in an opinion from the attorney general from 1984. In general, the opinion commented that the Department of Fish and Game could inspect without a warrant when it was necessary to ensure compliance with a permit. 1984 Inf. Op. Alaska Att'y Gen. (May 1; 166-346-83). The opinion goes on to state, citing Woods and Rohde, Inc. v. State, 565 P.2d 138 (Alaska 1977), that "the court suggested that, because of the pervasive regulation of fisheries, warrantless searches in connection with that industry may be valid."

The broader scope for inspection without a warrant found in 5 AAC 39.140 appears to be closely tied to fishing permitting and the tight regulation of the industry, even going so far as to include canneries and salteries. The attorney general even defended in the opinion the warrantless inspection on the basis of the fishing industry having pervasive regulation. The same cannot be said for taxidermy. In statute, taxidermy only appears thrice -- in AS 16.05.330 stating simply that a license is needed, in AS 16.05.340 listing the price for a license, and in AS 16.05.940 defining taxidermy. Additionally, taxidermy only appears three times in regulation as well. (Note: I also searched "taxidermist" without getting any more results.) However, there may be certain conditions of which I am unaware that are tied to obtaining a taxidermy permit in the first place. If there are a number of rules that go along with getting this type of permit, then perhaps the level of regulation would rise to the amount needed to allow for an inspection of this kind. Further, one can argue that taxidermy is merely an extension of fish and game, or even under the broad umbrella of fish and game. Under this argument, one can then consider taxidermy to be highly regulated since fish and game are highly regulated.

Generally speaking, Alaska has adopted a two-part test regarding Fourth Amendment privacy considerations, requiring (1) a person to first exhibit an expectation of privacy and (2) that the expectation is one that society would consider to be reasonable. Woods, 565 P.2d at 149. I am not sure that the records of a taxidermy business would fall under the category of being completely protected under the above test. The Supreme Court of Alaska had occasion to comment on the expectation of privacy in a fishing scenario in Nathanson v. State, 555 P.2d 456 (Alaska 1976). In that case, a man was convicted of fishing for king crab before the legal opening, and Fish and Game officials pulled his pots out of the water when he was not around. Id. In deciding that the Fish and Game officials did not overstep their bounds, the Court determined that part of the reason the person had little privacy interest was due to the great degree of fisheries regulations. Id. Thus, a warrantless search as is allowed by 5 AAC 39.140 is backed by the fact that the fishing in the state is so highly regulated. And as far as I know, there have not been any major disputes regarding the warrantless inspection fishing regulation (and the proposed regulation mirrors that regulation very closely).

The type of a warrantless inspection for a taxidermy business in the proposed regulation is allowed in states such as Washington (RCW 77.15.096), Wyoming (Wyo. Stat. 23-6-111), and Pennsylvania (Pa. Code 147.1(b)). In each of those, the language is somewhat similar to the proposed Alaska regulation, but the search is usually limited to administrative inspections. Also, the administrative inspection cannot be used as a pretext for a broader search of a business for things other than records and making sure



regulations are followed. In a case from Pennsylvania, the court stated that "one of the well recognized exceptions to the warrant requirement -- administrative inspections pursuant to regulatory regimes -- may in fact be implicated if taxidermy is recognized as a highly regulated business." Showers v. Spangler, 182 F.3d 165, 172. Further, the court noted what was required of a taxidermist and commented on a general search of a business:

In this instance, the text of the Inspection Statute, on which Spangler relies, makes three demands of taxidermy permittees: (1) they must "keep accurate records" and "other information" as required; (2) these records must be "kept for a period of three years"; and (3) these records shall be "open to inspection by any officer of the commission." In turn, from these same provisions, an officer of the Commission is vested with the power to inspect said same records and information. We see nothing in the Inspection Statute that may be read to confer a general search power. Indeed, all of the obligations and rights created by the statute are tied to the duty to keep and ability to inspect a permittee's *records*. (Emphasis in original.)

Id. at 172 - 173. I do not know if a licensed taxidermist in Alaska is charged with the duties listed above, though keeping accurate records seems a likely requirement of any business. And, of course, there are numerous rules on the books regarding what a hunter or fisherman can do to take the animal in the first place.

The proposed Alaska regulation may be broad in its scope. The inspecting of fish and game mentioned in the regulation does not appear to be tied to records of any kind. There is a later mention of sealing paperwork and operational compliance, but I am not sure how far "operational compliance" goes. That being said, the Washington statute mentioned earlier does allow for inspection of "the premises, containers, fishing equipment, fish, shellfish, and wildlife, and records required by the department." RCW 77.15.096.

In the end, there is precedent around the country for agents to inspect a taxidermist's business without a warrant. However, I am unsure of what weight case law or statutes from outside Alaska will carry within the state, and Alaska does not have any case law on this type of a situation involving taxidermy. Conditions being tied to a taxidermy license or permit would also tie in with a warrantless inspection based on the Alaska attorney's general's opinion. It seems that the administrative inspection of a taxidermist's business can be allowed if the inspection is limited and the field is well regulated already. If taxidermy is considered part of fish and game in general, then it would certainly seem that a warrantless inspection would be allowed due to the extensive regulation of matters involving fish and game.

If I may be of further assistance, please advise.





Representative Scott Jiu Wo Kawasaki

Alaska State Legislature

District 9 Fairbanks

February 14, 2011

Commissioner Joseph Masters
Department of Public Safety
P.O. Box 111200
Juneau, AK 99811

Dear Commissioner ~~Masters,~~ ^{JOE}

Thank you for the contributions you make as the chief public safety officer for the state. I appreciate the sacrifice and hard work your public safety officers and troopers do to keep all Alaskans safe. The work of the Alaska Wildlife Troopers is critical not only to the safety of Interior Alaskans but also fish and wildlife enforcement preserves our state resources for generations to come.

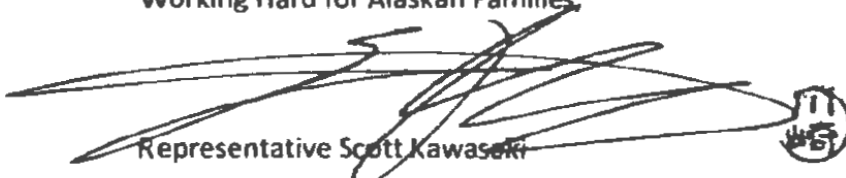
I have concerns regarding a proposal submitted to the Board of Game for consideration at the spring 2011 meeting. Proposal 220, proposed by the Alaska Wildlife Troopers, would provide authority to the Alaska Wildlife Troopers to inspect taxidermy businesses licensed within the state. While I understand some of the potential the difficulties involved with inspections and enforcement of game laws, I have some concerns that the proposal may become a nuisance to businesses that operate within the confines of the law.

My personal philosophy is that a state must have a compelling reason to make a restrictive law. To help me understand the request, I would like a little more information on the request.

- Explain precisely how the proposal would help in the apprehension of violators compared and why the traditional issuance of a search warrant doesn't work?
- How many taxidermists are currently licensed within the state?
- How many violations have been issued as a result of discovering illegal activity in a license taxidermy business?
- What is the official position of the Department on the proposal?

Thank you for providing me with answers to these questions. I look forward to working with you on these very important issues. Please let me know if there is anything I can do to assist you in the future.

Working Hard for Alaskan Families.



Representative Scott Kawasaki 





State of Alaska

Department of Public Safety

Division of Alaska Wildlife Troopers

Sean Parnell, Governor
Joseph A. Masters, Commissioner

March 2, 2011

Representative Scott Kawasaki
District 9
State Capitol Building Room 430
Juneau, Alaska 99801

Re: Board of Game Proposal 220

Honorable Representative Kawasaki,

I write in response to your February 14th, 2011 letter seeking information regarding proposal 220 scheduled to be heard at the March 2011 Region Two, Board of Game meeting. Specifically, your request asks several questions pertaining to inspection authority by the Department of Public Safety at licensed taxidermy businesses. To assist you in some of these questions, I have provided a copy of our division's comments to the Board of Game on this proposal, it is attached.

Currently, Alaska Department of Fish and Game is the licensing agency for taxidermists. These licenses are required to be renewed bi-annually at a cost of \$200 for residents and \$500 for non-residents. In 2009, ADF&G sold 53 taxidermy licenses. In 2010, ADF&G sold 56 taxidermy licenses. ADF&G estimates that there are about 100 licensed taxidermists statewide.

With regard to your two part question asking how this proposal would help in the apprehension of violators and why a traditional search warrant would not work, I offer this explanation. One of our primary mandates is the enforcement of wildlife and fisheries laws in the state. From time to time, these laws need to be updated or improved upon. As I am sure you are aware, this primarily occurs within the Board of Game and Board of Fish process. Proposal 220 addresses a specific need for enforcement to have limited inspection authority on a commercially licensed business which utilizes Alaska's wildlife and fisheries resources. This authority is not new to public safety. It can also be found in the commercial fisheries industry and to some extent through other licenses such as; fishing, hunting or trapping. The Department of Public Safety has identified three areas where we would seek inspection authority:

- 1) The creation of a log sheet to be kept by the taxidermist.
- 2) Authority to inspect State of Alaska, Department of Fish and Game sealing records (if applicable).
- 3) Inspection of game or parts of game held by the taxidermists for taxidermy purposes.

Most taxidermists operate within the confines of the law. While the state regulations that govern how a taxidermist may operate are few, taxidermists take delivery of game and fish that is highly regulated and highly prized in the state for its economic and subsistence status. Public Safety has dealt with cases where taxidermists receive game from hunters and do not keep track of it within their business operations. Specifically hunters do not receive the same animal back as they bring into the taxidermist. An even larger problem are cases where taxidermists launder animals through their business that are not able to be sold in the State of Alaska and shipped to the lower 48 or beyond where the sale may be legal. Some of the examples provided in our written comments to the board address specific cases where the consumer is



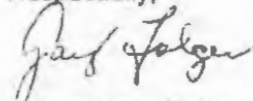
harmful. In fact, one of the benefits of this proposal would be increased consumer protection through inspection. The hunting industry spends millions of dollars per year in Alaska and some seek the services of a licensed Taxidermist. These consumers want the best service possible. Finally, this proposal would actually protect the legal taxidermist from some liability. The normal course of our investigations leads us to the hunters. Sometimes, it is difficult or impossible to get probable cause to find where the illegal animal is located. While most taxidermists are cooperative with law enforcement when requested, we do encounter some who do not cooperate at all. By having authority to inspect the log sheet, sealing paperwork and the animals, enforcement would be better situated to catch the hunter who has violated. Unless we can show that the taxidermist was involved with the violation or was conspiring with the hunter to commit a violation, the taxidermist has no liability in this situation.

With regard to your question asking how many violations are issued as a result of discovering illegal activity in a licensed taxidermy business, that is a difficult question to answer. AWT visits multiple taxidermists annually during the course of official investigations. Some of these investigations result in citations to the taxidermist, but the majority of the citations in these investigations go to the hunters. These cases tend to be very complicated and intertwined with other wildlife cases. Generally, when Wildlife Troopers discover illegal activity in a taxidermy business it is on a large scale. While these cases are few, with inspection authority, we feel that most of these large scale cases would be discovered well before they got to this level.

Your final question asks "What is the official position of the Department of Public Safety on this proposal". We feel that this proposal, while adding some additional burden to taxidermists, provides a balance between industry, consumers and law enforcement. The additional cost to taxidermists will be negligible, as the log sheet and sealing paperwork will be state issued documents. Some additional time may be required by taxidermists to comply with the regulation. Finally, the Department of Public Safety supports the concept of this proposal and realizes that the board process is a public vetting of this concept. Through this public discussion we hope to address everyone's concerns and ultimately arrive at a version of the proposal that the board will vote on.

Thank you for your questions and concern on this issue. Like you, we are here to serve the best interests of the people of Alaska. Please do not hesitate to contact me if you have any further questions.

Respectfully,



Colonel Gary Folger
Director, Alaska Wildlife Troopers

Cc: Commissioner Joseph Master, Department of Public Safety





Trout Unlimited Alaska

December 13, 2011

Dear Mr. Johnstone and Mr. Judkins:

Given the emerging science on the fisheries values of habitat created by beavers, the Trout Unlimited Alaska Program supports the acquisition of this information, especially Alaska-specific information, by the Alaska Department of Fish and Game. We encourage the joint Boards of Fisheries and Game to direct the department accordingly in this regard.

Thank you,

Mark Kaelke
Southeast Alaska Project Director
(907) 789-5550



Comments for Statewide BOG Meeting in Anchorage 1/13-17, **2012**

#46 and 47—Support—Big Game trophies, once harvested, are private property, and as such should be able to be disposed of as the owner wishes.

#49—Support—I believe the State Wildlife Troopers are stretched thin as it is, and any tool we can give them to help enforce our wildlife regulations, especially poaching, we should do it. As far as the businesses being in private residences, that is a choice the taxidermist made. If they do not want the records inspections in their home then can move the business out of the home.

#51—Support—I think the department is severely handicapped not having the latitude and longitude of kill sites for all hunts. The aerial surveys are taken in November after the migrating moose have already moved to their winter grounds, yet the Department must set up hunt zones for a September hunt. It is a difficult process. If they knew where the moose were being taken in September they could more accurately set up those zones for the next year.

#66, 67 ,68—Support—Every western state except Alaska has a resident preference when it comes to their big game tags. Additionally, every western state except Alaska and New Mexico have either a Preference Point or Bonus Point System. New Mexico is a “straight draw”, but limits non-residents to 6% of the tags if not signed up with an outfitter, and 10% if on an outfitted hunt. I have been applying in several Western states for several years, using their preference point or bonus point systems, and they work to all hunters advantage.

#71—Support—this proposal is a little different than 72, 73, and 74 in that it is based on Intensive Management Law. IM law specifies that in Intensive Management areas Alaska residents must have a preference to the harvesting of all big game prey populations of animals (moose, caribou, deer and/or elk). While the Department does apply those concepts in some cases, i.e. only residents may apply for GMU 20A any bull and antlerless hunts, it is not applied in all cases. A good example is the caribou herd in GMU 20A that has been decimated by predators. The Department has a drawing for 150 permits for that herd, and the draw is open to residents and non-residents alike, with no preference for resident hunters.

#72, 73 and 74—Support—Once again, Alaska is the only western state that does not provide for a resident preference for all of its big game hunts.

#75 and 76—Support with an amendment—Every recent poll has indicated that hunters of all ages are declining, which is a real shame. One way to encourage more youths to get involved in that activity is to have youth hunts at a time when they can be good quality hunts, without having to compete with literally thousands of other hunters. I agree with



the one proposal that mandates that the adult hunter with the youth would sacrifice their harvest ticket for that species if the youth is successful. The amendment that I would propose is to have the youth hunts be a draw hunt, with the hunt units and number of tags per unit specified by the Department.

#78,79,80,81,82,83,84,85,86—Support—Especially for Dall Sheep, Alaska residents deserve a season preference for this species. It is one of the premier hunts in Alaska, and the residents who live here year around, spend their money in this state, and endure it's harsh winters should be able to have a quality sheep hunting experience, without to battle (and it is a battle) the hoards of guides, and assistant guides all vying for the same small number of landing areas, ridge tops and draws while hunting and stalking the same sheep.

Last August my son-in law and a friend, both experienced sheep hunters, decided to try a hunt in the Brooks Range. They flew scheduled and charter flights into Kavik, arriving on August 8—two days before the season opener. The weather had not been good for flying the two days prior to their arrival, so many of the aircraft there had been grounded—unable to drop off hunters. He sent me a picture from there, showing 16 aircraft parked on that small strip. They could not get flown out for a day, so he had time to talk to individuals there, and discovered that all but two of the aircraft belonged to guides, assistant guides, or were air taxis flying clients out for guides! By the time they could be flown out on the 10th, the air taxi they had arranged to fly them out, told them than nearly every gravel bar, ridge top, and/or drainage in the eastern Brooks Range had an aircraft, hunter or “ghost camp” set up on it. So, they opted to be dropped off in an area with not hunters, but very few sheep, and a very low chance of getting sheep. They hunted for 14 days, covering many miles, and only saw one sheep that was even close to legal, which they decided not to take. What they did see, was 7 predator killed rams in the area they were hunting, so the predators are doing quite well up there.

At the recent Fairbanks AC meetings I listened to several guides testify that if these proposals were to be adopted many more sheep would be killed. Their rationale was that there would be “hundreds of assistant guides, who never get to sheep hunt, would hunt not only their guide areas, but the areas that others are guiding in” in that 7 day period before non-residents could hunt. For starters, I say, more power to them. If resident assistant guides want to go sheep hunting during that timeframe, then they deserve a quality hunt, the same as any Alaska resident. That all being said, that and similar statements made by the guides were just about the most ridiculous thing I have heard in all of my 64 years! So, let's see, all these assistant guides are going to go out and shoot all the legal rams in the same area(s) where they are planning to guide non-residents who have paid \$10,000-\$20,000 for a sheep hunt!

The other thing we heard over and over, was about all the money that non-resident sheep hunters bring into the Departments budget. It's true that non-residents pay \$450 for a sheep tag, while residents pay \$5. Additionally, some of them pay for a hotel stay, and possible a charter fare, however, a majority of that \$15,000 goes into the guide's pocket. There would be a small number of non-resident hunters who would decide that they do not want to follow the residents on a hunt, but that would be a small number. These



proposals do not limit the number of non-resident hunters—it just allows resident hunters to hunt before non-residents.

We also heard from retired sheep biologist Wayne Heimer, and big game guide Joe Want. The thrust of their “research” was that hunters are only taking approximately 50% of the legal rams during the regular season. In fact, Mr. Want indicated that a majority of the very large rams are taken in the last part of the season. So, as far as I am concerned, the data that the two of them presented fully supports these proposals to open the season 7-10 days early for resident hunters.

Once again, Alaska is the only western state that does not give it’s residents a preference for sheep hunting—either in the form of restricted number of non-resident tags, or an early season. My research of western states shows the following:

Western State Non-Resident Restrictions

New Mexico

Has a straight draw system (no bonus or preference points) Only 6 % of big game tags go to non-resident hunters doing self-guided hunts—10 % to hunters who have contracts with a outfitter.(NR sheep tag=\$3,180)

Montana

Has a Bonus Point System. Non-Residents are limited to 10% of the moose, sheep and goat tags.(NR sheep and moose tags-\$800)

Wyoming

Has a Preference Point System for Non-Residents for deer and elk. The non-resident draw odds average 6%.(NR sheep=\$2,266/moose=\$1,146)

Colorado

Has a Preference Point System. In most “trophy areas” non-residents are limited to 20% or less of the available tags in the drawing. In many of the hunts, the points needed get raised every few years, so in many cases a non-resident will wait 10-15 years to draw a tag, or never draw one.(NR sheep and moose tag=\$1,800)

Utah

Has a Bonus/Preference Point System. It currently takes approximately 8-14 years for a non-resident to draw a good elk tag, and 4-17 years for deer.(NR sheep and moose tags=\$1,500)

Nevada

Has a Bonus Point System. Certain elk and deer tags are not available to non-residents at all. Non-residents have a shorter season.(NR sheep/elk=\$1200)



California

Has a Preference Point System. Non-residents oftentimes only get one tag (or none), especially for elk and antelope. (NR elk=\$1200)

Oregon

Has a Preference Point System, except for sheep. Non-res must pay a non-refundable \$140 to apply. (NR sheep tag=\$1300)

Arizona

Has a bonus point system. Non-residents pay a non-refundable \$151 to apply. Non-residents are limited to 10% of the sheep tags. (NR sheep tag=\$1407)

Kansas

Has a Preference Point System. Although they have mule deer, whitetail, elk and antelope, non-residents may only hunt whitetail and mule deer.

So, it is obvious from the above, that every state but Alaska has decided to give their residents a preference when it comes to hunting their big game. Additionally, they have figured out how to fund their game departments, by charging non-residents a lot for their tags.

One last thing—we also heard testimony at those AC meetings, over and over, that these are not “anti-guide” proposals—they are “Pro-Resident” proposals, and it is high time the Board recognize that it is time that Alaska residents get a preference for hunting sheep.

#87, 88, and 89—Support—Of all of these three proposals I prefer #88, as I think it is the most biologically sound approach to this issue.

#100—Support, with amendment—There is no reason to not allow hunters to take both coyotes and **wolves** at night, using a night vision scope. For starters the opportunities to do so are extremely limited, so when the opportunity arrives, hunters should be able to reduce predators by this method.

#101—Support—The coyote population is exploding statewide, and this would increase the chances of more of them being taken, allowing more moose and caribou calves to live.

#113—Do not adopt—The state needs all the help it can get to reduce illegal hunting activities. There are far too few State Wildlife enforcement personnel as it is.

#114—Support—As a general rule, bears do not come into a bait station until right at dark, or early the next day, so there is no reason to not allow same day airborne for black bear bait stations. Additionally, we are talking about a small number of black bear bait stations that are accessed by aircraft. I know the Board is reluctant to open the door on



same day airborne, but this is one case where there should be an exception, as it makes sense, and may allow more predators to be taken.

Larry Dalrymple
767 Chena Hills Drive
Fairbanks, Alaska 99709
907-456-1922



I, too, strongly protest this method of "wolf control."

How about darting the males and neutering the number that "should" be neutered. If neutering should not be done, how about some sort of birth control for either sex.

Pat Bock
PO Box 240322
Douglas, AK 99824



Alaska Department of Fish and Game,

In regards to Proposal 36-Unit 15c, I am against this proposal. Let me express my reasons.

Proposal 36/Unit 15c:

- Near Homer and Anchor Point, the general moose population has been healthy, with a 30 percent increase from 1992 to 2010. The moose population is in the middle of the objective number of moose, indicating there is no emergency need for such heavy-handed methodology. See above highlighted comment on ADF&G brochure.
- BOG implemented a change to Unit 15C removing spike, fork, and 3 brow tine from harvestable moose population and there has not been time to see the effects of these changes. So an aerial wolf kill program is premature.
- Biology does not support this intense management program as moose population concerns in 15C are not driven by wolf predation but the result of an insufficient harvest strategy which has been exacerbated by illegal harvest and moose-motor vehicle collision.
- Unit 15c has an abundance of other food source including fish, organic beef, and great gardening climate. Unit 15c is on the road system, which increases the hunting pressure on moose.
- The human population has increased so that there will never be enough moose for everyone who wants to kill one and realistically there never will be.
- In a 9-1 vote, the Homer Fish and Game Advisory Committee recommended that the Board of Game not approve this intensive management.
- The ADF&G brochure notes that predator control isn't done until biologists have studied the causes of declining game populations and the impact of predators and tried other methods, such as improving habitat, reducing hunting and easing predator trapping and hunting regulations.
- ADF&G did receive funding to conduct moose studies in Unit 15A and Unit 15C and plans to do that next March, as well as wolf research. That would be after aerial wolf control starts in January, if approved.

Please consider these facts before it is too late,

Cindy Birkhimer



Dear Sir/Madam:

I am vehemently opposed to Proposals 35 and 36 and am supporting Proposals 43 and 127.

Please do the morally right and economically wise thing.

Thank you,

Dr. Maria Proietti



Dear BOG:

I am writing to ask that you oppose proposals 35 and 36. The thoughtless killing of these animals is simply not based on scientific evidence nor is it in the best interest of population control of ANY of the species, wolf or prey animals. Wolves balance the animal populations, keeping animals such as hares in check when their numbers increase too much. They also keep disease out of moose and other large animals as they concentrate on those animals and keep the herds healthier. This type of 'control' is neither focused nor efficient, it is simply barbaric.

I would also ask that you support proposals 43 and 127. Beavers play an important role in their habitats, keeping the ecosystems healthy. The snaring of black bears is simply another 'control' that is random and beyond cruel.

Alaska is a land filled with wildlife, a treasure that much of the rest of the U.S. has lost due to unbridled human greed and indifference. Do not let this happen in a state so rich with land and animals that need our protection.

Respectfully,

Sondra Meyerhoff
Maryland



Oppose 35, 36

Killing wolves is not the solution to the problem of low moose population. I would look to habitat issues as the source of the problem, and probably over-hunting. Considering that trophy kills of moose mean that the biggest and strongest are taken, the entire moose population is weakened because the genetic pool is weakened by those biggest, strongest moose being taken out of the gene pool.

Gentlemen, pay better attention in science class. Further, the invasion of the habitat by all of the hunters destroys the habitat in ways you wouldn't believe. Damaged habitat can't support large numbers of moose. Wolves aren't the problem, once again, it is people. People blame everything and everyone for their mistakes instead of taking responsibility for what they have done. Messing with the gene pool and messing with the habitat are to blame and that spells MAN!

Get real. Blame the real destroyer of ecosystems and wildlife.

Karen Dettmann
Teacher, Biologist, Wildlife Rehabilitator
Florida Keys



Please oppose Proposals 35 and 36. The ADF&G's own research clearly shows that in GMU 15A habitat is what is limiting moose populations, and even if wolves are killed the moose will still have far too little to eat. In GMU 15C, moose population goals have been met and the killing of wolves would constitute a blatant attempt at game farming. The result would be significant negative impacts on the integrity of the ecosystems.

It is time for the State of Alaska to act in accordance with 21st century scientific knowledge, and cease the pandering to narrow special interests who would destroy Alaska's wonderful wildernesses.

Thank you.

Bill Zager



I support Proposal 43 asking the BOG to update regulations regarding trapping "nuisance" beavers to control property damage. **Current regulations are outdated and fail to recognize the important role beaver habitat plays in healthy ecosystems for fish, birds and other wildlife.** Specifically, current regulations fail to consider the installation of beaver pond flow devices as a method of preventing or alleviating property damage. There are alternatives to trapping and killing the beavers!

--

Take care,

Terry Traveland
Traveland Law
P.O. Box 865057
Plano, Texas 75086



Dear Alaska Board of Game Members,

Although it has been many years since I called Alaska home, my heart still lives up there. The wildlife is what, in part, makes Alaska so special, and I continue to share the state I love so dearly with others, bringing small groups of people to the state to experience its magic and to view wildlife. I urge you to consider the following requests in your upcoming votes:

First, I implore to you to **OPPOSE Proposals 35 and 36**, which authorize airborne killing of wolves on the Kenai Peninsula. Not only is aerial killing inhumane, it is "anti-science," and is counterproductive, and is contradictory to the lifestyle & economy of the area.

Second, I urge you to **SUPPORT Proposal 43 and 127**, in order to maintain healthy ecosystems and healthy black bear populations, among other ethical and relevant reasons to support these proposals.

Thank you for taking my views into consideration.

Beth

Beth Davidow
3455 W. Sparks Trail
Prescott, AZ 86305
and
439 Cahle Bay Heights
Far Northland, New Zealand



Dear Sirs:

I am asking you to vote against proposals 35 and 36 which would allow the aerial killing of Kenai wolves. I am a Maryland resident, but I have traveled to Alaska nearly every year since 1995, and twice before that. I come to Alaska to see the wildlife. I am an amateur wildlife photographer.

The killing of these wolves is wrong for three environmental reasons, besides letting these great creatures live just for our enjoyment.

1. The lack of proper food is what is limiting populations of moose, not wolves.
2. The proposed action is just game farming. Nature needs to do what is necessary.
3. There has been a large hare population recently, and they feed on willows, a main moose food. If there are not enough wolves to kill the hares, the moose will suffer from loss of food.
4. People like me come to Alaska for the wildlife. Destroy that, and you will not have the same amount of tourism. And I have spent thousands there over the years!

Thank you.

Kaleen Vaden
26583 Lawrence Adams Drive
Mechanicsville, MD 20659



TO WHOM IT MAY CONCERN:

I am asking for the opposition to not pass Proposition #35 & #36

These proposals provide authorization for the airborne killing of wolves in two Game Management Units on the Kenai Peninsula. They are simply an anti-science "gift" to the special interest commercial hunting organizations, and were requested by the BOG itself, not Alaska Department of Fish and Game biologists.

- The ADF&G's own research clearly shows that in GMU 15A habitat is what is limiting moose populations, and **even if wolves are killed the moose will still have far too little to eat.**
- In GMU 15C, moose population goals have been met and the **killing of wolves would constitute a blatant attempt at game farming.** The result would be significant negative impacts on the integrity of the ecosystems.
- Another issue in 15C is the well-documented sustained peak in the hare population. When the hare population is this high they constitute a major part of the wolves' diet. Therefore, **killing wolves would be counter-productive because hares feed on the same willows which are a staple food supply for moose.**
- The Kenai Peninsula is a world-renowned, year-round recreation area for Alaskans and visitors alike, and supports several population centers. **Indiscriminate aerial wolf hunting would be contradictory to the lifestyle and economy of this area.**

I am also asking for your **support** of two additional proposals:

Proposal 43 asks the BOG to update regulations regarding trapping "nuisance" beavers to control property damage. **Current regulations are outdated and fail to recognize the important role beaver habitat plays in healthy ecosystems for fish, birds and other wildlife.** Specifically, current regulations fail to consider the installation of beaver pond flow devices as a method of preventing or alleviating property damage.

Proposal 127 would prohibit black bear snaring. The Alaska Center for the Environment submitted this well-researched proposal that we ask you to support for the following reasons:

- **Hundreds of bears have been killed over the past three years after being caught in a snare,** including black bears, brown bears, sows and sows with cubs in this ADF&G "experiment".
- This indiscriminate and cruel practice is spreading throughout the state, and **if the BOG approves this, anyone will be able to apply for a permit to snare bears.**
- A recent scientific report shows **independent scientists are concerned that Alaska is headed down the same path** as every other state which once boasted healthy bear populations.

Please know that these steps will preserve the wildlife at the present state and not have these animals risk the chance to be added to the endangered list that has continually grown larger in every passing year.

Best Regards,

Daniel Gross
Philadelphia, PA



Please OPPOSE proposals 35 and 36.

- The ADF&G's own research clearly shows that in GMU 15A habitat is what is limiting moose populations, and even if wolves are killed the moose will still have far too little to eat.
- In GMU 15C, moose population goals have been met and the killing of wolves would constitute a blatant attempt at game farming. The result would be significant negative impacts on the integrity of the ecosystems.
- Another issue in 15C is the well-documented sustained peak in the hare population. When the hare population is this high they constitute a major part of the wolves' diet. Therefore, killing wolves would be counter-productive because hares feed on the same willows which are a staple food supply for moose.
- The Kenai Peninsula is a world-renowned, year-round recreation area for Alaskans and visitors alike, and supports several population centers. Indiscriminate aerial wolf hunting would be contradictory to the lifestyle and economy of this area.

These proposals are counter-productive and senseless!

Thank you for your consideration of my opinion on this matter'

Mary W. Traveland
407 W. Lookout Dr.
Richardson, Texas 75080



December 29, 2011

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

Re: Proposals 35 and 36

Please accept the following comments from Wolf Haven International concerning the Alaska Board of Game's adoption of Proposals 35 and 36 allowing the aerial killing of wolves on the Kenai Peninsula. Wolf Haven International is a non-profit wolf sanctuary and education center located in Tenino, Washington. We represent over 6,000 supporters, and are visited by over 12,000 people annually. We have supporters from every state and over 30 countries, and therefore follow and comment on issues involving wolf management throughout the United States and internationally.

We strongly urge the Board of Game to **reject Proposals 35 and 36** that will allow aerial killing of wolves on the Kenai Peninsula. There are many, many reasons justifying rejecting these two proposals:

- The Alaska Department of Fish and Game's own research clearly shows that in GMU 15A habitat is what is limiting moose populations, and **even if wolves are killed the moose will still have far too little to eat.**
- In GMU 15C, moose population goals have been met and therefore there is no justification for killing more wolves. If more wolves are killed, the integrity of the ecosystem would be significantly negative.
- Another issue in 15C is the well-documented sustained peak in the hare population. When the hare population is this high they constitute a major part of the wolves' diet. Therefore, killing wolves would be counter-productive because hares feed on the same willows which are a staple food supply for moose.
- The Kenai Peninsula is a world-renowned, year-round recreation area for Alaskans and visitors alike, and supports several population centers. Indiscriminate aerial wolf hunting would be contradictory to the lifestyle and economy of this area.

p. 1/2



We would also like to express our **support for Proposal 43 and 127**. We support Proposal 43 because it recognizes the critical role that beaver play in maintaining healthier ecosystems on which all wildlife and humans depend. We support Proposal 127 which prohibits black bear snaring because we are adamantly opposed to inhumane methods of killing wildlife, and because it will prohibit the indiscriminate killing of bears, including grizzly bear sows with cubs.

Thank you for your consideration of our comments,

Linda Saunders
Director of Conservation
Wolf Haven International
Tenino, Washington

p. 2/2



Dear Board of Game,

I am requesting that you please consider **opposing** proposals 35 & 36.

Some of the issues that have been brought to my attention by the Alaska Wildlife Alliance include:

- The ADF&G's own research clearly shows that in GMU 15A habitat is what is limiting moose populations, and **even if wolves are killed the moose will still have far too little to eat.**
- In GMU 15C, moose population goals have been met and the **killing of wolves would constitute a blatant attempt at game farming.** The result would be significant negative impacts on the integrity of the ecosystems.
- Another issue in 15C is the well-documented sustained peak in the hare population. When the hare population is this high they constitute a major part of the wolves' diet. Therefore, **killing wolves would be counter-productive because hares feed on the same willows which are a staple food supply for moose.**
- The Kenai Peninsula is a world-renowned, year-round recreation area for Alaskans and visitors alike, and supports several population centers. **Indiscriminate aerial wolf hunting would be contradictory to the lifestyle and economy of this area.**

I am also requesting that you please consider **supporting proposals 43 & 127.**

Some of the issues that have been brought to my attention by the Alaskan Wildlife Alliance include:

Proposal 43 asks the BOG to update regulations regarding trapping "nuisance" beavers to control property damage. **Current regulations are outdated and fail to recognize the important role beaver habitat plays in healthy ecosystems for fish, birds and other wildlife.** Specifically, current regulations fail to consider the installation of beaver pond flow devices as a method of preventing or alleviating property damage.

Proposal 127 would prohibit black bear snaring. The Alaska Center for the Environment submitted this well-researched proposal that we ask you to support for the following reasons:

- **Hundreds of bears have been killed over the past three years after being caught in a snare,** including black bears, brown bears, sows and sows with cubs in this ADF&G "experiment".
- This indiscriminate and cruel practice is spreading throughout the state, and **if the BOG approves this, anyone will be able to apply for a permit to snare bears.**



- A recent scientific report shows **independent scientists are concerned that Alaska is headed down the same path** as every other state which once boasted healthy bear populations.

I am the president of my university's chapter of the Wildlife Society. We live in New England and yet are still impacted by these proposals. Our love of animals, and wolves and bears in particular, inspires us to advocate for them. We are deeply concerned for the future of these animals, as well as the health of the ecosystem that they are so deeply a part of. Please consider helping to protect Alaskan wildlife.

Thank you,

Adam Markey & the University of Rhode Island Wildlife Society
16 Whispering Pines Road
Richmond, R.I. 02898

P. 2/2



December 28 2011

Written comment on the BOARD OF GAME PROPOSALS

Proposal number 48: **PURCHASE AND SALE OF GAME**
I SUPPORT THIS PROPOSAL AND STRONGLY URGE THE BOARD TO SUPPORT PROPOSAL 48

The sale of black bear meat is just an incentive to promote the killing of more black bears and increase the moose and caribou populations and is inconsistent with NPS management policies.

Proposal number 94: **UNLAWFUL METHODS OF TAKING FURBEARES**
I SUPPORT THIS PROPOSAL AND STRONGLY URGE THE BOARD TO SUPPORT PROPOSAL 94

This prohibits the taking of wolf, fox wolverine or coyote during May, June or July. Pelts are not prime and animals are denning with young.

Allowing this practice will have as a consequence: **starving pups.**

This is not an image that Alaska needs. Tourism is a growing industry and many Alaskan businesses depend on it.

Proposal number 97: **UNLAWFULL METHODS OF TAKING GAME**
I SUPPORT THIS PROPOSAL AND STRONGLY URGE THE BOARD TO SUPPORT PROPOSAL 97

The use of artificial light is not consistent with fair chase ethics.

Proposal number 108: **TAKING CUB BEARS AND FEMALE WITH CUBS PROHIBITED**
I SUPPORT THIS PROPOSAL AND STRONGLY URGE THE BOARD TO SUPPORT PROPOSAL 108

Killing cubs and female black bears with cubs is unethical and wrong.

This is not an image that Alaska needs. Tourism is a growing industry and many Alaskan businesses depend on it.

Proposal number 121: **PERMIT FOR HUNTING BLACK BEAR WITH THE USE OF BAIT OR SCENT LURES**
I SUPPORT THIS PROPOSAL AND STRONGLY URGE THE BOARD TO SUPPORT PROPOSAL 121

Baiting of bears is a dangerous practice.

Bait stations target all bears, young and old and trophy bears. Only the trophy bears will be killed.

It creates a dangerous situation for other recreational users.

Johanna Bakker
Auke Bay Alaska



December 29, 2011

Written comment on the BOARD OF GAME PROPOSALS

I SUPPORT THIS PROPOSAL AND STRONGLY URGE THE BOARD TO SUPPORT PROPOSAL 127

Bear snaring and trapping has been allowed since 2010 and is a practice that concerns me and many Alaskans greatly. To have bear snaring stations as close as 1/4 of a mile from residences, roads and trails is unsafe for people and their pets. If a cub gets caught the sow poses an unacceptable threat.

Many tourists that come to Alaska want to see bears, wolves, eagles and any kind of wildlife. For many Alaska is a trip of a lifetime.

These extreme snaring and trapping practices for bears do not create an image that we as Alaskans want.

The tourism industry is still growing and many Alaskan businesses depend on it.

So please stop this program and respect our wildlife.

Johanna Bakker
Auke Bay, Alaska



Written comments on the BOARD OF GAME PROPOSALS

Proposal number 43: **PERMIT TO TAKE BEAVERS TO CONTROL PROPERTY DAMAGE**

I SUPPORT THIS PROPOSAL AND STRONGLY URGE THE BOARD TO SUPPORT PROPOSAL 43

Research from the last decade or more has been showing the beneficial effects of beaver habitat.

They create ponds that benefit moose, birds, fish, semi-aquatic animals, like mink and otter and many other living organisms

It is time to update the management of beavers based on the latest research.

Therefore I support proposal 43.

Johanna G Bakker
Auke Bay, Alaska



December 28 2011

Written comment on the BOARD OF GAME PROPOSALS:

Proposal number 35: **INTENSIVE MANAGEMENT GAME MANAGEMENT UNIT 15A**

I OPPOSE THIS PROPOSAL AND STRONGLY URGE THE BOARD TO REJECT IT

In GMU 15A the forest has matured with the result: less browse for moose.

Therefore the habitat in GMU 15A can not support the numbers of moose from 20 years ago.

Shooting wolves will not improve the habitat. It will not increase the numbers of moose.

Proposal number 36: **Intensive Management Implementation Plan Unit 15C**

I OPPOSE THIS PROPOSAL AND STRONGLY URGE THE BOARD TO REJECT IT

In GMU 15C, moose population goals have been met.

In GMU 15C the hare population is at a sustained peak and is a major part of wolves' diets.

Since hares feed on the same willows as moose, killing wolves would leave more hares to feed on the willows.

Less willows will be left for moose to feed on.

No predator control is necessary.

Johanna Bakker
Auke Bay Alaska



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 so 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.

--Two polls taken on the Kenai Peninsula, while not scientific, clearly show the residents of the Kenai Peninsula overwhelmingly oppose aerial hunting.

-Lastly, on the 10 miles of the Kenai Spur Highway (running between Soldotna and Kenai), between August 10 and Oct 24, 2011, twelve 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



Please do not let the wolves be killed in this manner. These noble animals are the cousins of our canine friends. I can't imagine something happening to our loving pets.

Please OPPOSE Proposals 35 and 36. Help keep our wildlife safe.

Cathy Leonard



URGENT! Help Us Stop Airborne Wolf Killing on the Kenai!

I OPPOSE 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 over-harvest of bull moose.

The ADF&G's own research clearly shows that in GMU 15A habitat is what is limiting moose populations, and even if wolves are killed the moose will still have far too little to eat.

In GMU 15C, moose population goals have been met and the killing of wolves would constitute a blatant attempt at game farming. The result would be significant negative impacts on the integrity of the ecosystems.

Another issue in 15C is the well-documented sustained peak in the hare population. When the hare population is this high they constitute a major part of the wolves' diet. Therefore, killing wolves would be counter-productive because hares feed on the same willows which are a staple food supply for moose.

The Kenai Peninsula is a world-renowned, year-round recreation area for Alaskans and visitors alike, and supports several population centers. Indiscriminate aerial wolf hunting would be contradictory to the lifestyle and economy of this area.

I also SUPPORT Proposal 43:

That asks the BOG to update regulations regarding trapping "nuisance" beavers to control property damage. Current regulations are outdated and fail to recognize the important role beaver habitat plays in healthy ecosystems for fish, birds and other wildlife. Specifically, current regulations fail to consider the installation of beaver pond flow devices as a method of preventing or alleviating property damage. (See the in-depth article in the Summer 2011 issue of Alaska Wildlife Echoes entitled "Beavers, People and Officialdom: the evolution of cooperation in Juneau" for more information about the Beaver Patrol's extensive work with beaver habitat.) This proposal was submitted by AWA-SE Board member and Beaver Patrol member Patricia O'Brien.

I also SUPPORT Proposal 127:

p. 1/2



Which would prohibit black bear snaring. The Alaska Center for the Environment submitted this well-researched proposal that we ask you to support for the following reasons:

Hundreds of bears have been killed over the past three years after being caught in a snare, including black bears, brown bears, sows and sows with cubs in this ADF&G "experiment".

This indiscriminate and cruel practice is spreading throughout the state, and if the BOG approves this, anyone will be able to apply for a permit to snare bears.

A recent scientific report shows independent scientists are concerned that Alaska is headed down the same path as every other state which once boasted healthy bear populations.

Sincerely,
Cherish Bahr

p. 2/2



Sirs,

This is yet another request from myself and many other concerned and informed citizens that **OPPOSE proposals number 35 and 36**. The proposed aerial killing of Kenai wolves is a crime against nature not to mention wolves! As a retired military officer, physician, and former biologist I am appalled and disgusted by the anti-science and corrupt stance the BOG is taking and the relentless and sneaky way they are trying to defy even the Alaska Department of Fish and game biologists database. It is very clear that special interest groups i.e. commercial trophy hunters, and Wolf haters in general are behind this outrageous effort.

The data from the Department of Fish and Game clearly indicates that habitat and food supply is what is limiting the moose populations in the respective areas not to mention overhunting. Indeed, a major part of the Wolf diet in that area consists of hares.

Killing wolves would boost the hare population to the point where it would affect the food supply for the Moose which is the same as the hares; namely, Willows!...thus destruction of willows [what comes to mind is the field mice scourge in Oregon years ago when the coyotes were exterminated. The end result was a destroyed crop due to the infestation of field mice] thus the anticipated action and results by the BOG makes no ecological sense and in fact are very destructive.

The killing of wolves would constitute a blatant attempt at game farming and the result will be significant negative impacts on the integrity of a large part of that ecosystem.

The Kenai Peninsula is a year-round recreation center and indiscriminate aerial wolf hunting would be repulsive and contradictory to the lifestyle and tourist business in this area.

Finally, this type of unethical and indiscriminate action sets a very bad example to the rest of the world as to how we manage and conduct ourselves in wildlife management. Long and the short of this, it's disgraceful shameful and disgusting. Please stop this slaughter!!

p 1/2



In addition to the above commentary I'm also requesting that beavers be given a fair shake so to say. They to play an important role in a healthy ecosystem. Indiscriminate thoughtless killing without addressing alternative methods such as installation of beaver pond flow devices is contrary to sound and ethical judgment.

In closing I also am is strong opponent against bear snaring... a cruel and vicious practice which is threatening healthy bear populations.

It makes me wonder how Asian populations view us (trafficking of bear gallbladders etc) when we engage in this idiotic rhetoric and senseless killing of wildlife and admonish them for their cruel animal practices. How hypocritical!!

Thus I **support proposal 43 and 127.**

Thank you for your time and attention to my concerns,

Dr. I. de Baintner MD
Boston MA

p. 2/2



2030 Mary Allen Ave.
Homer, Alaska 99603
27 December 2011

Dear Board Members,

I'm a marine biologist who's studied predators – killer whales – for the last 24 years. I received my MS in marine biology at UAF in 1993. I am writing to **oppose Proposals 35 and 36** that would institute aerial wolf control in Units 15A and C on the Kenai Peninsula.

My grounds for opposition are scientific. These measures appear to be a way to deal with “public pressure” rather than to address the real causes of lower moose numbers: declining moose habitat in Unit 15A due to lack of fire, and recent low bull-cow ratios in unit 15C. As state biologist Tony Kavalok indicated to the *Peninsula Clarion*, a new study of predation on moose would likely confirm an earlier study showing that *black bears* kill far more moose than wolves do on the Kenai, but that in order to appease public pressure, wolf control would be instituted anyway, before the results of the new study were known. He was quoted saying that the control program was a way to show that “we are serious” and “we will do something.” When I think of the term “serious” in terms of ADF&G, I like to think it's referring to serious science. But Kavalok's statement says something far different and disturbing. He admits that wolves are a convenient and “resilient” scapegoat, allowing the department to side-step better, perhaps more complex, management considerations. To avoid doing, in other words, the hard work of finding truly effective means to manage moose. Perhaps hunters are clamoring for more moose on the Kenai, but it seems to me, this approach insults their intelligence. Many hunters I know (my daughter and son-in-law included) rely on the expertise of state biologists to soundly manage game populations based on biology, not public relations, not putting on a show. Proposals 35 and 36 are biologically unsound, and are an embarrassment to ADF&G, which is supposed to manage via sound scientific practices.

Using aerial wolf control as part of intensive game management is not only a biological issue; it is a complex ethical issue that deserves continued public debate. The public, including the hunting public, as you know, is divided about this practice. When such a charged, controversial management tool is treated with flippancy by a state biologist, not to mention the Assistant



Director of Wildlife Conservation, it belies understanding. I hope that you will act responsibly in this matter at your meeting, and vote down Proposals 35 and 36, and charge ADF&G with doing their job of investigating real measures to make sure that the Kenai Peninsula continues to provide habitat for moose and their predators, and to provide enjoyment of wildlife, consumptive and otherwise, for all citizens, through sound science. Thanks you.

Sincerely,
Eva Saulitis

p 2/2



**Matkin Fisheries/Research
2030 Mary Allen Ave
Homer, Alaska 99603
(907) 235-6295**

Alaska Department of Fish and Game
Boards Support Section
P.O. Box 11526, Juneau, AK 99811-5526

Dear sirs,

28 December 2011

I am a 38 year Alaska resident, have hunted since I've been in Alaska, although I eat more fish than meat as I get older! I am also a marine biologist and have worked in recent years extensively as a consultant to the National Marine Fisheries Service regarding marine mammal studies. I would like to address **proposals 35 and 36** that would initiate wolf control on the Kenai Peninsula and both of which I **OPPOSE**. Although in principle, I can understand the use of predator control to encourage rebound of prey populations, the type of action proposed for the Kenai Peninsula is unwarranted at this time.

In Unit 15A the Department as well as the Kenai Wildlife Refuge managers admit that reduction of habitat due to lack of fire and regrowth of moose browse is the culprit in the moose population decline. Only a small part of the Unit is even available for predator control, as the Refuge will not allow it. To kill predators that are acknowledged not to be the big issue in population decline is simply wrongheaded and only seeks to appease some members of the public that simply see wolves as competitors and a problem no matter what the situation.

In Unit 15C it is acknowledged that moose numbers are not the issue. The moose are not declining. The issue is lack of sufficient harvest to satisfy the public due to new restrictions on bulls. How this justifies wolf control is beyond my understanding. Especially when it is freely acknowledged that bears may be a much bigger issue in regards predation, and this predation would be primarily on calves and young. The older, stronger bulls that ADF&G is trying to protect with regulations are unlikely to be the targets of wolf predation. The wolf control proposal is counterintuitive to providing a strong population of breeding bulls, and, again, simply seeks to appease elements of the public that are upset because of the changes in regulations to protect bulls. This is the poorest kind of game management, to scapegoat predators to appease folks upset with managers who are simply managing hunting responsibly.

These are proposals as they show an unsettling lack of respect for the non human predators in the system. These proposals do not even wait for the results of new studies that may very well indicate bears to be the primary moose predators (the last study showed 34% of

p 1/2



calves that died were killed by black bears and 6% were killed by wolves). These are proposals to appease certain types of hunters and are not biologically founded, nor rational at this point. Thank you for your attention.

Craig Matkin

$p^2/2$



I OPPOSE BOG Proposals # 35 and #36

I SUPPORT BOG Proposals #43 and #127

Thank you,

Susan Meyer



Oppose 35 36

Please stop killing wolves. We have the same awful issue in Sweden and for now the government has stopped the hunt on this beautiful animal, so I hope Alaska will do the same.

Corina Glijnis



Hello,

I OPPOSE BOG Proposals # 35 and #36

I SUPPORT BOG Proposals #43 and #127

Thank you!
Ms. R. Tobler



According to Religious leaders : ALL LIFE IS PRECIOUS and worthy of love!!

There should be no room for Cruelty and violence.. Because EVERY BEING is beautiful and unique and it must be loved and respected!

So be against the proposals 35 and 36!!

LISA BOLOGNANI



Oppose 35 and 36

Please stop the aerial gunning of wolves. This is a barbaric act against wildlife such as wolves and they do not deserve to be treated in such atrocious manners such as these. Please take into considferation of how many wolves will be killed and therefor leaving pups to fend for themselves so please consider a no kill option for wolves. They are amazing animals and have feelings also.

Thank you, Connie Luye



I oppose 35 and 36

Aerial killing of any animal is inhumane and cruel. Please....stop the aerial killing of Kenai wolves!

Thank you,

Julie Schampel



To: Alaska Department of Fish and Game,

As a part of your open public comment for pending wildlife management I would like to state the following:

I strongly oppose proposals 35 and 36.

I do however support proposals 43 and 127.

Thank you,

Lori Colt
(505) 699-7404
Santa Fe, New Mexico



OPPOSE 35 36

PLEASE do not allow the aerial gunning of Kenai wolves which is currently being talked about. Wolves help the eco system and do not deserve to be hunted at all, let alone in this most unfair and barbaric way.

Thank you,
Karen Wallo



To whom it may concern,

I OPPOSE proposals 35 and 36. I oppose all aerial gunning whether it's for recreational hunting and/or wildlife management. I look forward to visit the Kenai Peninsula in the future to appreciate and support the community due to the landscape and allowing this hunt will deter me from doing so.

Thank you for giving me this opportunity to comment.

Maggie Howell
35 Fanton Rd
Danbury, CT 06811



Oppose 35 and 36

My family and I want to weigh in on your proposals 35 and 36--aerial hunting of wolves in certain areas:

We consider this an act of barbarism having nothing to do with ethics or justice or even animal control; it's all about saving ungulates for "sport" hunters (and we don't consider it "sporting" to shoot canids from the air!). Also about wolf disrespect and hatred.

We've traveled Alaska exhaustively and with pleasure in the past; but that was in Tony Knowles' day. Hope we can do it again someday: beautiful State that's beyond our moral compass at the moment.

Thank you;

The Zucker family
Eugene OR



I OPPOSE BOG Proposals # 35 and #36

I SUPPORT BOG Proposals #43 and #127

Heike Killet

--



Oppose 35 & 36

Proposals 35 and 36 are horrible not only because of the killing of the wolves but also for the unscientific manner with which it is done. I am not suggesting that we should place wolves above humans, but I am saying that they should be respected and should not be exterminated like this.

Also, at this point, killing them hardly has any benefit. Moose populations have been met, and the wolves are not taking a significant amount of moose food to make a difference there. Along with that, so, the wolves mostly eat rabbits, and the rabbits eat more moose food than wolves do. So, by killing the wolves, rabbit population is increased, and moose population is decreased.

Proposal 127 regarding the bear snares is one that I **support** and is definitely a justifiable idea. Too many states have decreased their bear populations to minimal amounts, and Alaska does not need to be one of them. Their population needs to rise a little more before snaring can be justified at all.

Thanks,
Jonathan Thurston



I oppose proposals 35 and 36

I support proposals 43 and 127

patti newby



Oppose 35 and 36

Shooting wolves from the air on the Kenai is just one more extension of the horrible treatment Alaska's wolves are receiving from people who are supposed to be stewards.

Why are politicians in charge of wildlife oversight, rather than scientists?? Humans are the predators we need to control, not the wolves and bears.

Diane Raynor
Anchorage AK



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
Douglas, AK



To Whom It May Concern,

I OPPOSE BOG Proposals # 35 and #36

I SUPPORT BOG Proposals #43 and #127

Kathy Hodges
Walterboro, SC



I OPPOSE BOG Proposals # 35 and #36

I SUPPORT BOG Proposals #43 and #127

Donata Ahern



I oppose proposals 35 and 36.

As a popular tourist destination, it would be wise to consider the reputation of Alaska and the Kenai Peninsula as a humane and safe spot that tourists can visit without the stain of the incredibly cruel and irresponsible practice of aerial wolf killing. It is counterproductive to Alaska's rugged and beautiful outdoor attractions that speak to thousands of tourists who spend money to see this magnificent state. Don't spoil it for us by implementing the horrors of aerial wolf kills which only serve to keep tourists and their money out of Alaska and the Kenai Peninsula.

Thank you
Florence Stasch



Please REJECT Proposals 35 and 36 !!!

WE find the shooting of these magnificent creatures deplorable!!

Katarina Flynn

Olivia Flynn

Maggie Flynn

Patricia Wolf

Fred Wolf

Paulette Canavares

Roy Stout

Helen Stout

Jason Nuesca

Melissa Nuesca



I oppose proposals 35 and 36.

I oppose the aerial killing of wolves on the Kenai Peninsula and the illogical conclusion that it will increase moose survival. I have read several articles on such.

Deb Carlson
Cooper Landing, Alaska



I oppose Bog proposals #35 #36.

I support Bog Proposals #43 #127

Hugh Rook



Dear Sir or Madam:

I am writing to express my **opposition to Proposals 35 and 36** and to express my **support of Proposal 43**.

Alaska is looked at by the people of my state as a pristine, magnificent, naturally gifted place of immeasurable beauty. Therefore, from the tourist aspect, alone, seeing wolves and wildlife in Alaska is paramount. Wolves, of course, must live in the wilderness, they must hunt and they must be allowed to exist. Aerial hunting, aside from being a real unsavory ambush assault, will not solve the issues.

When people want to visit Alaska, it is partially to see iconic, free-spirited, American symbol - wolves!

Gray wolves are currently being massacred in the states of Idaho and Montana and there, the tourist dollar has dropped off due to the unpopularity of these states with their regard to "wolf management".

Please embrace the magnificence of your wild apex predators and not just your prey animals. When the apex predator of a region is removed the eco-balance is off kilter - this is nature's design.

Thank you.

Mr. & Mrs. John Camac



I OPPOSE BOG Proposals # 35 and #36

I SUPPORT BOG Proposals #43 and #127

Heidi L. Pastore

2663 CR 332

McKinney, TX 75071



I oppose Proposals 35 and 36

I support 43 and 127

Please protect our wildlife!

Thank you.

Anne Christian
4769 Westridge Dr.
Oceanside, CA 92056



Oppose 35 and 36

Wolves possess an incredible innate intelligence and magnificence of spirit.
Killing wolves reduces those same qualities in ourselves.

It is time we crawled out of the primordial ooze and recognized that all life
is *One*.

Please stop the killing.

Leslee Morrison



I OPPOSE BOG Proposals #35 and # 36

I SUPPORT BOG Proposals #43 and #127

Jeannie Dulin



Dear Board of Game,

I am a resident of Washington state and frequently go to Alaska for recreation. One of the things I love about Alaska is the wildlife

I **oppose proposals 35 & 36** that permit hunting of wolves from a plane. As is usual in wildlife management, habitat is vitally important to increase the moose populations. The wolves also eat the hares which also eat the same willows that the moose eat. Killing wolves does little for the moose population and also alters the natural balance of things.

I **support proposal 43** which is new regulations about beaver hunting and trapping. In my state we are reintroducing beavers. They help make ponds which support the ducks and other wildlife.

I also **support 127** which prohibits black bear snaring. Again, slaughtering our wildlife will not help Alaska.

Your considerations are appreciated.

Elizabeth DeNiro
16226 N. Sands Road
Mead, WA 99021



I **oppose** proposals 35 and 36 as they are inhumane.

I **support** proposals 43 and 127.

Dena Selby



TO WHOM IT MAY CONCERN:

Oppose 35 and 36

What is this fascination for humans to kill wolves by air? Whatever makes it easier. I am writing on behalf of the wolves of Alaska. This technique is **TOTALLY UNFAIR FOR ANY ANIMAL. GOD created the wolf for a purpose; just like God created us for a purpose. There is a difference, however. Humans are supposed to be smarter than any animal.**

Why is it that as soon as the wolf population gets to a certain number, humans decide it's time to kill the wolves off. So much money and effort has been afforded to raise the number of wolves in many states and around the world. **IS THIS A GAME TO AMUSE HUMANS (hunters, ranchers, etc.)? Sure seems like it to me. I THINK IT IS DISGUSTING WHAT YOU PEOPLE DO TO THESE ANIMALS.**

There are better ways to control wolves and you know it. Find another way....you have a brain....use it.

DEIRDRE L. COCHRAN
COLORADO, USA



I am writing in **support of proposals 43 and 127.**

Proposal 43 seeks to update regulations regarding the trapping of 'nuisance' beavers in order to control damage to property. The current regulations are outdated and they don't recognize the crucial role beaver habitat plays in a healthy ecosystem for birds, fish and other wildlife. The current regulations don't take into account the installation of beaver pond flow devices as a way to prevent or lessen property damage.

In support of proposal 127- In the last 3 years, hundreds of bears have been killed after being caught in a snare - including black and brown bears, sows with cubs, and sows. This cruel and indiscriminate method is spreading throughout the state and if this is approved, anyone will be able to apply for a permit to snare bears. A recent scientific report indicates that independent scientists have concerns that Alaska is headed for the same fate as every other state that once had healthy populations of bears.

Thank you,
Mary N. Rothschild



I oppose 35 and 36

Please stop the killing of wolves. Wolves are wonderful creatures.

Sincerely,

Greg Goodmacher



I'm writing to **oppose proposals 35 and 36**. Firstly, even if wolves are killed, moose will not have enough to eat. The ADF&G's research shows that moose populations are limited by habitat in GMU 15A. Secondly, moose population goals have already been met in GMU 15C and killing wolves would be an attempt at game farming. This would have a seriously negative effect on the integrity of the ecosystems. Thirdly, the well-documented sustained peak in the hare population is another issue in 15C. A major part of the wolves' diet is hares when their population is this high. Killing wolves would, therefore, be counterproductive because the hares eat the same willows which make up a staple food supply for moose. Alaskans and visitors consider the Kenai Peninsula a world famous recreation area which supports several population areas. Indiscriminate aerial wolf hunting is contradictory to the economy and the lifestyle of this area.

Thank you for considering my comments.

Mary N. Rothschild



Dec. 23, 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. Most of the land ownership in area 15A is within the Kenai National Wildlife Refuge, thus predator control is not appropriate.

As for the remaining areas, predator control will likely be ineffective and unlikely to positively affect moose populations. The main cause of low moose populations on the Kenai has everything to do with habitat. In March of 2011, Fish and Game biologists recognized that habitat was limiting moose population growth in 15A in the Feasibility Assessment. At the same time, 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 2011 meeting and, despite extensive biological evidence that such a reduction was necessary, was rejected by the BOG. Additionally, there has not been a population census done on the wolf population on the Kenai, nor has there been a predation study to prove that predators are responsible for the reduction in 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. 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. 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.

Respectfully submitted,
Diane Bentivegna
Diane Bentivegna



Oppose 35 and 36

Urgent: Please stop the aerial killing of the Kenai Wolves!

Linda Schilling



OPPOSE 35 36

Please stop! This is un-natural and barbaric. The State of Alaska would be better served promoting eco-tourism instead of butchery. Showcase the beauty and wildness of the State, encourage travelers to observe animals in their natural habitat...do something positive. When I think of Alaska, I think, not of the beauty of the State but rather the State that butchers wolves. Alaska still pays a bounty on wolves, bring in a fore-leg get \$150, or something like that. It doesn't matter, that is what's stuck in my head. When I lead my tours at the wolf sanctuary, that's what I tell my visitors. I would be thrilled to tell them Alaska has reformed and now embraces and protects wolves.

Please make the great State of Alaska a safe place for wolves to live and raise their families - to live and die, naturally, without persecution - wild and free.

Thank-you for your time.

Respectfully, Sindy Schalon
Cripple Creek CO



**To: Alaska Department of Fish and
Game Board**

**From: Judy Kimminau
1118 Fillmore St.
Denver, CO 80206
720-204-2044**

Re: OPPOSE Proposals 35 and 36

I'm writing today as I have in the past to ask you to please stop the most inhumane practice in game management that I have ever seen, please stop Proposals 35 and 36!

Your own department, your team of biologists does not support this work; they have studies that illustrate that this practice will further harm the other game in the area. I have been to Alaska many times and have met numerous Alaska natives who adamantly oppose this practice further, as a tourist; I will not continue to provide revenue to your state if you continue to cater to a few unethical hunters.

My understanding is that your role is to understand and administer policies for the health and safety of all animals and ensure that a stable system exists. This policy of hunting is the cruelest policy ever created and needs to be stopped immediately.

Further, please **support Proposals 43 and 127**. These proposals specifically state that policies should be updated in the control of the beaver population. This is something I would assume should be a normal part of your role. Outdated proposals served a purpose at one time but should always be reviewed to understand if the need is still present. Further, I have also seen snaring of black bears and strongly request that you prohibit this inhumane, unmanaged and outdated practice. As your own research suggests this practices kills sows with cubs and other wildlife. Snaring, if used at all, should be used only by your employees or others who understand and can safely use the practice. I can't imagine the wildlife that will be injured and killed just because someone who has no idea what they are doing has a permit to do this!

As I mentioned, I spend a lot of time and money visiting your state. I've met Alaskans and people from all over the world who travel to your wonderful state specifically to see the wildlife that you are endangering. Again, catering to a small minority of unethical hunters is not what the power of this Board should be used to do. I urge you to focus on your mission, listen to your own scientists as well as those of us who travel to, and deeply care for, your state.



To the authorities responsible for wildlife in Alaska:

Oppose 35 / 36

We are appalled by the practice of killing wolves from the air in the United States and especially in Alaska. Wolves belong in nature where they have an important function to fulfill. Your anthropocentrism is killing our planet, wake up!

Kind Regards,

Iris Gallegos
Lussac-les-Eglises
France



Oppose 35&36

Hello,

To my belief nature has given much to man but now man is taking and taking.

The hunting of these wolves does bring a blow to the eco system as the killing of the bears. Snare killing? Everyone should come to understand that as I once said before that at some point children will only read about these animals but not ever really see them. How can anyone learn anything by just reading a book? If you want to learn about something to see it for yourself does give a bigger impact upon understanding it's nature or how everything works or what gives people the inspiration to make changes.

You have people who go fish so they have food to put on the table and some do it for sport and this does remind me of something about native American tribe tales when it comes to hunting saying they only hunt what they're going to eat otherwise they leave it alone. This tribe shows much respect for it's environment even so that after they hunted the animal and eaten it they bury the animal back in the ground.

But with commercial hunting whether it to be the Kenai Wolves Bears or Moose it gives of a signal for people to make changes happen to preserve the eco system in their land, and keep animal life intact for later generations to see and as this eco system is part of the land, and has been part of there lives.

So what are we doing?!

Killing wolves for the amusement of others? Killing bears because people believe it's their right? Taking away a mother from her cubs same with wolves.

At some point when there is nothing left then will men regret the choices they have made and the children will pay the price for this.

The Kenai Peninsula a world renowned year round recreation area ... hmmm.....what are these people coming over there for? What would these visitors say when the wildlife is no more visible? People who live in cities don't see these animals run free as they only can see them in a Zoo living in captivity or a book. It just isn't the same when you look at an animal in cage because then you have to wonder how would you feel when you have to walk around in cage?

That's why you see people go to protected areas where these animals dwell seeing all this live makes most people tell themselves that this planet still has its beauty to give but is mostly unseen when living in a city.

The hunting of the wolves doesn't give anything more then given a blow to the eco system you kill one animal you're taking away food for another.

This is how nature is made up but men don't follow nature but man made rules which at the end will become its downfall.

Oppose 43

Now the beavers - seeing as they are as important to the eco system even these animals have their purpose in this eco system that has existed even before man was walking this planet always have the laws of nature made out everything how it is supposed to be.

p. 1/2



In past times people hunted to survive against the cold, created fire to keep warm wearing animal skin or slippers made from animals which was out of survival otherwise even you wouldn't be sitting here either. Nature could just have killed of mankind thousands of years ago but we're still here and only now I'm getting to see even more at what level mankind is going to put itself and it's not going to be at the top of the food chain....

When a wolf kills a sheep it's because it's hungry and their turf is limited so they dwell there because their land has been built upon - even bears & moose have there turf.

Nature is a beautiful thing to have so to keep it as it is and the lives within this can only produce a eco system that thrives and grows. Not this one because this one is in decline.

And these are changing times and only wise people can save others.

Sincerely,

Bart Van Hoeck

Dear members of the Board of Gaming,

Oppose 35 and 36

I respectfully ask you to stop the indiscriminately aerial wolf killing in the Kenai Peninsula. As shown by the Alaska Department of Fish and Game, diminishing the wolf population will not restore the moose population and in fact will increase the hare population that directly competes with the moose since they share in great part the same diet.

Humankind has failed time and again in their attempts to control nature and play "God", all efforts to control population of a certain species will inevitably carry secondary effects far worse than the original perceived problem, nature has its own way of dealing with over population and no human intervention could possibly equal much less surpass the efficiency of mother nature.

I would also like to request that you **support proposals 43 and 127**. Beaver habitats are an absolute necessity to a healthy fish and wild life ecosystem and must be protected at all cost. In regards to inhumane bear snaring I beg you to support proposal 127, as mentioned above reducing the population of large predators in any habitat creates great imbalances in the entire food chain, humans cannot control everything in nature and time and time again we have proven how inefficient we are at managing resources and populations even our own. Let's allow the wild to remain wild, and lets grant the future generations a chance to experience the beauty of a the majestic site of wolves, beavers and bears in the wild.

Respectfully,

Cynthia Adams



Alaska Board of Game
Boards Support Section
PO Box 115526
1255 W 8th Street
Juneau, AK 99811-5526
FAX 907-465-6094

December 28, 2011

Re: Alaska Board of Game 2011/2012 Proposal Book, Arctic, Western, and Interior
Regions and Statewide Regulations, Cycle B Schedule

Proposed changes to existing Falconry Regulations, specifically 5 AAC 92.037
Alaskan Falconry Manual No. 9

To the Alaska Board of Game:

Opposed to Proposal 38, 5 AAC 92.037, Permits for Falconry, Section (f)
Addition of new raptor species legally available to falconers.

I oppose the addition of the new species to the list: (1) turkey vulture, (2) osprey, (3) bald eagle, (4) white-tailed eagle, (5) Steller's sea eagle, (7) Asiatic sparrow hawk, (9) Cooper's hawk, (11) Harris' hawk, (12) Swainson's hawk, (14) ferruginous hawk, (17) Eurasian kestrel, (20) Aplomado falcon, (23) prairie falcon, (24) Western screech owl, (26) snowy owl, (27) northern hawk-owl, (28) northern pygmy owl, (29) barred owl, (31) long-eared owl, (32) short-eared owl, (33) boreal owl, (34) northern saw-whet owl

Reason: None of the above bird species should be allowed to be taken from the wild for falconry purposes. Species that are not indigenous to Alaska are very rare birds in Alaska and should not be subjected to taking from the wild by falconers. I object to the addition of the Bald Eagle, our national symbol being used by a private person for personal sporting pleasure. I object to the use of owls, including native and rare owls, as inappropriate species for falconry purposes, especially those that are nocturnal hunters. Any species of concern should be deleted from the current list.

Opposed to Proposal 39, 5 AAC 92.037, Permits for Falconry, Section (f)
Addition of new raptor species legally available to falconers.

(4) Swainson's hawk, (12) northern hawk-owl, (13) snowy owl, (15) non-indigenous species: Harris' Hawk, Cooper's hawk, Ferruginous hawk, prairies falcon, Aplomado falcon for the same reasons as above.

Opposed to Proposition 40 5 AAC 92.037, Permits for Falconry, Allow nonresident falconers to capture wild Alaskan raptors.



There is no need to expand the capture wild Alaskan raptors to include nonresidents. Captive breeding programs are available to supply falconers around the world without disrupting wild Alaskan birds. Wild raptors are not exposed to many diseases and many captured wild birds soon die in a human environment. The captive breeding program produces birds with a stronger immune system and better resistance to disease.

Taking one wild nestling in Alaska is not an easy endeavor given the generally inaccessible nesting sites and fierce protection of the nest by the adults. Harassment of the adults, remaining nestlings, and surrounding ecosystem is inescapable. Unanticipated death by exposure to pathogens, early fledging of the nestlings, nest abandonment, and increased predation by other birds and mammals may result from the intrusion into a wild nest site. Despite the large size of Alaska, given the general expense of off-road access, raptor nests located on a road system are likely to be targeted heavily. Access via helicopter to off road areas is very disruptive to the nesting birds and surroundings.

Allowing a small privileged sector to take wild raptors in areas accessible to tourists and Alaskans reduces the quality of the others' experience, affecting tourism and quality of life, both important economic engines for Alaska. Enjoyment of Alaska's natural resources should not be diminished for the selfish pleasure of a few. As noted on page 72, "Falconers can purchase readily available goshawks, peregrines, and gyrfalcons from raptor breeders at a lower cost than travel expenses to Alaska, so the reason falconers desire a trip to Alaska is not solely for the bird, it is for the adventure."

Did anyone ask the parent Gyrfalcon or other raptor how it appreciated having a falconer enter its territory, disturb and disrupt its essential hunting activities and brooding to defend the eyrie from "adventuring" falconers, climbing up to its sacred nest to steal a precious chick? Are there any statistics on how many stolen chicks die from premature removal, stress, and poor handling? How many of the remaining chicks fledge prematurely and die? What is the effect on the stressed adults?

Even experienced, permitted falconers make identity errors. In 2011, falconers took two Gyrfalcon chicks from a nest in Adak Island in the Aleutians. They mistakenly thought it was a huge Peales Peregrine falcon. The fact that experienced Alaskan falconers could make such a serious mistake, and disrupt possibly the only Gyrfalcon nest in the Central Aleutians is one good reason not to allow nonresident falconers to take Alaska's wild falcons.

"It is to Alaska that the falconry community now looks in hopes that the people of Alaska will invite their neighbors from other States to further share in Alaska's bountiful resources." P 69

I disagree that wild raptors are "bountiful." With climate change, especially in Alaska, and increasing severe weather events at critical nesting times, these top predators are in trouble.



Enforcement of these regulations is expensive and the rules will likely be unenforceable. The modest fee suggested will not compensate the State of Alaska for the actual costs of operation and enforcement of the permitting program.

Our valuable raptor resources should not be expanded or exposed to further predation by non-residents.

I urge the Alaska Board of Game to delete the new species from the raptor list, and keep wild raptor take closed to non-residents. This Alaskan does NOT warmly welcome non-residents to have an adventure in Alaska at the expense of our prized raptors, quality of life, and non-invasive tourist activities.

I further support major revisions of the existing regulations to allow the taking of small numbers of wild raptors only to support certified captive breeding programs. I believe this is the only responsible and conservative way to safely manage this resource.

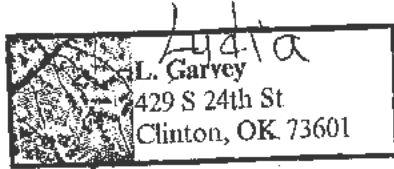
Thank you for your consideration.

Sincerely,

Carol Griswold

Carol Griswold
PO Box 1342
Seward, Alaska 99664

12.24.11 (BOG)



Dear Board of Game,

I strongly urge you to NIIX sparing of bears - Support #127 (Statewide) + #142 (Interior).

Stop the war on (Our Public) Wildlife! It is needlessly, senselessly cruel to sentient beings. Predators are vital to ecosystem balance. Such violence is extremely disrespectful (callous). Aircraft killing (etc..) is extremely non-sportmanship + cowardly (+ pussy ass). Disgusted!

This yr. = BOG "adopted" (w/ ^{wanton} ~~unilateral~~) new bear/wolf "management" (slaughter) without any public notice (or Any participation by F&G advis. com.'s + Expanded powers of BOG to ignore biological facts/science! Are you the Nazi-gastapo or what? There is no link to moose with extreme predator "control" (killing). Why is your member board - All picked by the governor? And why are they all linked to consumption users/industry?

To your job - Protect Our Public lands, waters, wildlife + health! You work for citizens - Not industry. Your attention to this most urgent matter would be much appreciated by all present + future generations of all species. Thank you, ~~G. [unclear]~~ Public Health



21 Dec 2011

MEMORANDUM FOR: ALASKA DEPT OF FISH & GAME

Boards Support Section
PO Box 115526
Juneau, AK 99811-5526

FROM: Steven L Hallenbeck (Alaska Drivers License number 7028335)

SUBJECT: Statewide Regulations Cycle B Proposal Comments

Dear Board Members:

I am an Alaskan resident hunter who is concerned about our game management in Alaska. I am unable to attend the Jan 13-18, 2012 meeting in Anchorage. Please accept my written comments as noted below.

1. I am writing to the Board of Game (BOG) to state that I **SUPPORT** Statewide Sheep Proposal Number 88 and all language referenced in this proposal authored by Alaskan resident Tyler Freel.

2. In the last decade, available sheep hunting areas, and available legal/quality rams have been drastically reduced due to increased completion by numerous user groups. Actions by the BOG in past sessions (Chugach 13D as an example going to a 100% drawing for both residents and non-residents) have displaced large blocks of user groups into adjacent areas increasing completion by all. Some game management units (20A) have almost 60 percent of the legal rams taken by non-residents, with a majority of those non-residents hunting with a required guiding outfit. Areas in the Brooks Mountain range within the Arctic National Wildlife Refuge (ANWR) have also seen a significant increase due to **resident** hunters being "pushed out"/dispersed by the unlimited guiding of non-resident hunters in their traditional hunting areas. I have witnessed this first hand over the last 4 years hunting in the ANWR. This overcrowding issue is a direct result of Alaska having no quota/no drawing on non-resident general harvest permits for Dall sheep.

3. I encourage the BOG to adopt this Proposal Number 88 and all language referenced in said proposal to ensure a quality Dall sheep hunting opportunity for all future generations of Alaskan resident hunters and non-residents alike. Adopting this proposal will clearly give "Alaskan Resident" preference to both the Dall Sheep resource but equally important, hunt-able Alaska State and federal land. This "Alaskan Resident" preference is not currently offered in general season Dall sheep hunts in any way.

4. If you have any questions or concerns, contact me at (801) 624-0242.



STEVEN L HALLENBECK
North Pole, Alaska Resident



PROPOSAL 88 - 5 AAC, Chapter 85. Seasons and bag limits. Convert all nonresident sheep seasons to drawing permits and limit to 10 percent of total permits.

The new regulation would state that all nonresident sheep tags would go to a draw-only permit system. The total number of nonresident tags would be allotted geographically so as the total will not exceed 10 percent of the total number of hunters in the region, similar to other states' systems. To establish a number of nonresident tags, the board should use geographical data and previous harvest data as the numbers are fairly consistent from year to year.

ISSUE: The state shows little or no priority for resident sheep hunters in general harvest areas. The disproportionally high harvest rate for nonresidents (39.5 percent of total sheep taken from 2000-2009) in these areas is causing competition between guides, other guides, and residents. This is making finding legal sheep harder and detracting from everyone's experience due to aggressiveness from competing parties.

WHAT WILL HAPPEN IF NOTHING IS DONE? If this problem is not solved, hunt quality will continue to plummet and all sheep hunting will likely go to draw only, as has already occurred in the Chugach Range, and Alaska residents will unnecessarily lose their open harvest privileges'.

WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED? Yes, this reduced harvest would relieve pressure on hard-guided areas and improve trophy quality by allowing more rams to reach their full potential for growth.

WHO IS LIKELY TO BENEFIT? Alaskan resident hunters, but also nonresidents hoping for a better quality sheep hunt, and it will give guides more sheep to choose from and less competition

WHO IS LIKELY TO SUFFER? Short term, guides will have fewer clients. As the market adjusts to reduced availability of non-resident hunts, the value of a guided hunt will increase.

OTHER SOLUTIONS CONSIDERED: Raise nonresident guide license price to 10X that of resident guides, this might not be under the Boards authority and it would be more effective to use the proposed changes.

PROPOSED BY: Tyler Freet

LOG NUMBER: FG042811346

PROPOSAL 89 - 5 AAC 85.055 , Hunting Seasons and Bag Limits for Dall sheep. Convert all sheep hunts to drawing only, 90% for residents.



21 Dec 2011

MEMORANDUM FOR: ALASKA DEPT OF FISH & GAME
Boards Support Section
PO Box 115526
Juneau, AK 99811-5526

FROM: Erika K Hallenbeck

SUBJECT: Statewide Regulations Cycle B Proposal Comments

Dear Board Members:


I am an Alaskan resident hunter who is concerned about our game management in Alaska. I am unable to attend the Jan 13-18, 2012 meeting in Anchorage. Please accept my written comments as noted below.

1. I am writing to the Board of Game (BOG) to state that I **SUPPORT** Statewide Sheep Proposal Number 88 and all language referenced in this proposal authored by Alaskan resident Tyler Freel.

2. In the last decade, available sheep hunting areas, and available legal/quality rams have been drastically reduced due to increased completion by numerous user groups. Actions by the BOG in past sessions (Chugach 13D as an example going to a 100% drawing for both residents and non-residents) have displaced large blocks of user groups into adjacent areas increasing completion by all. Some game management units (20A) have almost 60 percent of the legal rams taken by non-residents, with a majority of those non-residents hunting with a required guiding outfit. Areas in the Brooks Mountain range within the Arctic National Wildlife Refuge (ANWR) have also seen a significant increase due to **resident** hunters being "pushed out"/dispersed by the unlimited guiding of non-resident hunters in their traditional hunting areas. I have witnessed this first hand over the last 4 years hunting in the ANWR. This overcrowding issue is a direct result of Alaska having no quota/no drawing on non-resident general harvest permits for Dall sheep.

3. I encourage the BOG to adopt this Proposal Number 88 and all language referenced in said proposal to ensure a quality Dall sheep hunting opportunity for all future generations of Alaskan resident hunters and non-residents alike. Adopting this proposal will clearly give "Alaskan Resident" preference to both the Dall Sheep resource but equally important, hunt-able Alaska State and federal land. This "Alaskan Resident" preference is not currently offered in general season Dall sheep hunts in any way.

4. If you have any questions or concerns, contact me at (801) 726-4887.


ERIKA K HALLENBECK
North Pole, Alaska Resident



OPPOSE 35, 36

Dear BOG,

I am a professional naturalist guide and wildlife photographer who has lived in Homer for 11 years, and graduated from the University Of Alaska, Fairbanks with a BS in Wildlife Biology in 1999. I received an A in Terry Bowyer's Wildlife Management class, so I have a deep understanding of predator control theory. I am irritated, and ashamed by the State of Alaska's current views on wildlife for having to waste my time writing such a letter.

I strongly disagree with the proposed Kenai Aerial Wolf Control Proposal. It is true that I do value wolves and other predators as much as high ungulate numbers, but my feelings against this proposal go far beyond that. This would constitute poor wildlife management. Wolves are not the cause of the population decline of moose. It is a habitat issue. By taking the wolves out, you will only worsen the problem. Wolves help control snowshoe hares, which are having a devastating impact on browse right now. I can see this in my backyard! Severely overbrowsed habitat is far worse and long lasting than a few too many wolves. Prescribed burning, and intensive habitat modification is the answer to this problem, not wolf control.

There would be no benefit in reduction of wolves, but this action would worsen the reputation that Alaska has earned, as a cruel manager of wildlife, that is only concerned with consumptive uses. Wildlife watching is a hugely important, and fast growing, component of the economy. We must change with the times, adapt to the trends, and nurture our resources. Please make a smart decision.

Sincerely, Brad Josephs

Brad Long Josephs Po Box 3481 Homer, Alaska 99603



Dear sirs:

I oppose proposals to open up portions of the Kenai Peninsula to aerial wolf hunting. It has not been proven that wolves are driving moose populations down and this seems to be one of a continuing series of efforts aimed at farming more game animals. The number of wolves in Alaska has reduced considerably during the last decade to little effect on the prey herds.

I urge you to vote down Proposals 35 and 36 allowing aerial wolf hunting on the Kenai Peninsula.

Sincerely,

Mark J. Dinkel



Dear Board of Game.

My name is Marc Cooke and I am Co President of The National Wolfwatcher Coalition. We are a non profit with branches throughout the United States. Our many members, many of which reside in the State of Alaska are very disturbed with Airborne killing of Wolves in Alaska. Specifically, Game Management Units of the Kenai Peninsula. (oppose proposals 35&36)

Research is providing valuable information that targeting wolves and other predators for human caused mortality is not benefiting moose and other ungulates populations. This is not using the best available science which is readily available. We believe this is a shortsighted attempt to appease local hunters, local hunting groups and National Hunting organization like Safari Club International.

Furthermore, Alaskan Department of Fish & Game's own research has established clearly that GMU 15A is a habitat issue affecting moose and is not a wolf-created issue. Therefore, killing of the wolves will provide little to no relief for moose residing in this area. Habitat and food source are the responsible deficiencies...not wolves! Targeting wolves for killing will have long term detrimental implications on the entire ecosystem. Apex predators are one of the driving forces behind Trophic Cascade.

GMU 15C is another matter that clearly demonstrate that the intent of killing wolves is create a game farm arena or atmosphere. As I have stated above with Trophic Cascade. Allowing wolves to be killed in GMU 15C would toss local hare population into disarray. It's common knowledge that wolves that reside in this area consume hare. Killing wolves will tilt the healthy, functioning ecosystem into a spike in hare numbers. This in turn will have negative implications on grazing and other issues. Please remember that with a spike in hare population numbers the willows will have two forging competitor, striving to consume the willows....moose and the hare.

Last but not the least in importance. A growing group of National Wolfwatcher Coalition members enjoy vacationing in these and other areas of Alaska. They come to your State and these areas to see wolves! To kill wolves would force these individuals to look elsewhere to watch wolves....perhaps Yellowstone National Park?

Therefore The National Wolfwatcher Coalition is "OPPOSED" to any plan to kill wolves with or without the use of aircraft.

Concerning Proposal 43. We strongly encourage you to support this proposal. Times demand that current regulation stay current. We believe that the current regulations fail. They are outdated and don't recognize the critical role beaver play in the habitat. Therefore a healthy ,functioning ecosystem. We strongly encourage you to "SUPPORT" this proposal.



Last recommendation. Allow groups and concerned individuals to comment on future issues and proposal via direct email.

Thank you for the opportunity to comment on these issues.

The membership of The National Wolfwatcher Coalition we be watching carefully your decisions.

**Sincerely,
Marc Cooke
Co President
National Wolfwatcher Coalition**

p 2/2



I oppose 35 and 36

Please DO NOT allow the proposed wolf shootings to occur. Aerial shooting is wrong. Wildlife should be protected not slaughtered in such a barbaric way. Not on public lands that we taxpayers pay for.

People come to AK because of the natural unspoiled beauty of the LAND AND THE BEAUTIFUL WILDLIFE THAT LIVES THERE. Future generations have a right to see wolves run free and be part of nature and roam this land freely without being slaughtered!!

Carol Hadley



To the Alaska Board of Game,

I am writing in opposition to proposals 35 and 36 - the aerial hunting of wolves in the Kenai National Wildlife Refuge.

Research shows that even if wolves are killed, the moose in the areas of concern still have far too little to eat. The Hare population is high and competing with moose for the willows upon which they both feed. Killing wolves would be counter-productive, as wolves would prey on the hares, allowing more food for the moose.

Also, I am in support of proposal 43 - to update regulations on beaver trapping.

And proposal 127- to prohibit black bear snaring.

As this is a Wildlife Refuge. I am opposed to all predator control...I would like to visit Alaska someday and find that there are still some animals left.

Thank you,

Anita Pryor
Davis, CA



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.

I support Alaska Board of Game proposals 43 and 127. Proposal 43 would support updating current regulations and allow for responses other than trapping to address beaver complaints. Regulations should allow beaver pond flow devices to be installed and used to alleviate property damage blamed on beavers. Proposal 127 would stop black bear snaring. Black bears, brown bears, and even sows with cubs are currently being snared by the hundreds. Unless prohibited, anyone will be able to get a permit and snare bears in Alaska.

Thank you for reviewing my comments.

Linda Wagner
Nashville, TN

December 28, 2011



I am writing to state my **opposition to proposals 35 and 36.**

Research shows that in GMU 15A, habitat itself is limiting moose populations. Killing wolves will not add to that which moose can eat. In GMU 15C, moose population goals have been met. If wolves are killed, that would be game farming which would have seriously negative impacts on the ecosystems' integrity. Also, since hare population is at a sustained peak, and hare figure significantly in wolves' diet, killing wolves would make the hare population compete with that of moose in the consumption of willows. To hunt wolves from the air would contradict the lifestyle and economy of the area as exhibited by what the Kenai Peninsula offers tourists and natives alike.

I should, also, state my **support for proposal 43** to update regulations regarding the trapping of so-called "nuisance" beavers to control property damage. Additionally, I wish to voice my **support for proposal 127** to prohibit black bear snaring.

Thank you.

Stan Lanier



SUBJECT: Comments on proposals to the Alaska Board of Game

FROM: Gerald R. Brookman, 715 Muir Avenue, Kenai, Alaska
99611-8816

TO: Alaska Board of Game, in care of Alaska Wildlife
Alliance

I have been a resident of Alaska since 1957, and of the Kenai Peninsula since 1978. I would like to comment on four proposals that are before the Board of Game during it's upcoming meeting.

First, regarding Proposals 35 and 36: I am opposed to both of these. In Game Management Unit 15A, the problem is not predation by wolves, but lack of adequate browse. In GMU 15C, moose population goals have been met, and any reduction of the resident wolf population could only be justified as a lessening of the competition for human hunters, or as it might be called, "game farming". I favor keeping a more natural ecosystem, including wolves. I do not believe that aerial wolf hunting is justified in either of these units.

Second, I support Proposal 43. Methods less drastic than trapping should be used to manage any damage caused by beavers.

Third, I support Proposal 127. I do not believe that snaring is a sportsmanlike method of taking black bears, and I believe that it should be totally prohibited in Alaska.

Thank you for considering my comments.

Gerald R. Brookman



Oppose 35, 36

Since when has the wildlife agency been hijacked by special interest groups to decide which species will live or die, for millions of years mother nature has managed her wildlife perfectly, it determines the fate of a species by it's ability to adapt to changes and throughout the process of survival of the fittest maintains the balance of life within the eco-system, so why then do you find it so necessary on behalf of a few to manage an already perfect system??? Greed perhaps, your job was to watch over and not interfere with nature's dance of life, not choose which species has a profit margin as a base of income, I am outraged by your continual disregard for sound scientific based studies and have turned your agency's into a game ranch....aerial gunning is genocide and is in no way a proper use of your agency or the tax payers money....I implore you to reconsider other options and allow nature to sort it all out on her own....Alaska is huge with plenty of room for wildlife of all species and as far as human population goes holds less people than my home town of Seattle, Washington.....do not start up such a draconian plan of action again....we all suffer your continual ignorance....

Nicholas D. Genera....Federal Way, Washington



I am writing to **oppose the Proposals 35 and 36.** I believe it is inhumane to aerial hunt wolves and believe that it will not accomplish anything. The moose in the area will have a harder time finding food due to the inevitable increase in the hare population after the wolves are slaughtered.

This area is known for is known for it's natural beauty and wilderness. Aerial hunting is not part of the natural balance and will interfere with the areas ecosystem.

I strongly oppose Prop. 35 and 36. I do support **Prop.43** - updating regulations regarding beaver trapping and **Prop.127** - prohibiting bear snaring.

Thank you,

Jacqueline Keegan
Yorktown Heights, NY



Dear Board Members:

It remains a mystery as to why this letter needs to be written. I lived on the Kenai Peninsula for fifteen years. Tourism is incredibly important to the Peninsula. Killing wolves is not the way to get tourists to visit Alaska. It creates a very bad image.

As everyone knows there is no science to killing wolves. It is simply an attempt at wild animal farming and serves no real purpose. Please vote against proposals 35 and 36.

With the power of the internet, aerial killing on the peninsula of a favorite species will be broadcast world wide whether the national media covers it or not. Such coverage will deeply impact visitors to the Kenai Peninsula.

Sincerely,

Virginia Jones



Alaska Board of Game

I would like to let you know that **I oppose proposals 35 & 36** which authorize airborne killing of wolves in the Kenai Peninsula.

The ADF&G's own research clearly shows that in GMU 15A habitat is what is limiting moose populations, **and even if wolves are killed the moose will still have far too little to eat.** In GMU 15C, moose population goals have been met and **the killing of wolves would constitute a blatant attempt at game farming.** The result would be significant negative impacts on the integrity of the ecosystems.

Another issue in 15C is the well-documented sustained peak in the hare population. When the hare population is this high they constitute a major part of the wolves' diet. Therefore, **killing wolves would be counter-productive because hares feed on the same willows which are a staple food supply for moose.**

The Kenai Peninsula is a world-renowned, year-round recreation area for Alaskans and visitors alike, and supports several population centers. **Indiscriminate aerial wolf hunting would be contradictory to the lifestyle and economy of this area.**

As an avid wildlife photographer , some of us love to view the beautiful Alaskan wildlife, through the lens of our camera. Please leave us the ability to photograph a wolf in the wild .

I also support prop 43 updating regulations specific to beavers and I support proposal 127 which prohibits black bear snaring.

Remember, everything you love about your dog comes from the wolf.

Thank you

Mark Balitzer

San Diego Ca



Board of Fish and Game

Oppose 35 and 36

To Whom It May Concern:

Regarding the wolf-control measures on Alaska's Kenai Peninsula past research has proved that the wolf population has little to no effect on the moose and other prey populations, so implementing "wolf-control" is just politically correct wording for trigger-happy hunters wanting bigger and better "trophies". However, the state of the food source for the caribou, moose and deer has greatly affected the population numbers. Even in areas where the prey population doesn't wax and wane as dramatically depending on their food source, the wolves keep the prey numbers in check. If the herds of prey were left unchecked by their natural hunters, the fields they graze in would soon be depleted and then the populations would drop.

Please reconsider this wolf-control measure, there has to be a better way (such as control burn forests to encourage new growth) to increase the moose, caribou and deer population while keeping the small number of wolves intact.

Thank you,
Carly Schmid
California Resident



Against 35 and 36

Wolves are a deep centered love of mine. I have loved wolves ever since I was a kid. So the slaughtering, of these Majestic Animals is severely UNCALLED for and absolutely evil.

I am deeply concerned for their preservation. It would really break my heart/soul to find out that they will be extinct by the hands of the CRUELEST of humans. This is really an ATROCITY. Please fight for their survival. I can only do what I can because I live pay check to pay check. But when I can I do contribute to the fight.

Mr. Aaron Jason Cumbie



To Whom It May Concern:

The killing of wolves enrages and disgusts me and I believe that all of our wildlife should have the proper chance to flourish in their natural habitat, therefore, I OPPOSE proposals 35 and 36 due to that and the following reasons:

- The ADF&G's own research clearly shows that in GMU 15A habitat is what is limiting moose populations, and **even if wolves are killed the moose will still have far too little to eat.**
- In GMU 15C, moose population goals have been met and the **killing of wolves would constitute a blatant attempt at game farming.** The result would be significant negative impacts on the integrity of the ecosystems.
- Another issue in 15C is the well-documented sustained peak in the hare population. When the hare population is this high they constitute a major part of the wolves' diet. Therefore, **killing wolves would be counter-productive because hares feed on the same willows which are a staple food supply for moose.**
- The Kenai Peninsula is a world-renowned, year-round recreation area for Alaskans and visitors alike, and supports several population centers. **Indiscriminate aerial wolf hunting would be contradictory to the lifestyle and economy of this area.**

I SUPPORT proposals 43 and 127 due to the following reasons:

- **Hundreds of bears have been killed over the past three years after being caught in a snare,** including black bears, brown bears, sows and **sows with cubs** in this ADF&G "experiment".
 - This indiscriminate and cruel practice is spreading throughout the state, and **If the BOG approves this, anyone will be able to apply for a permit to snare bears.**
 - A recent scientific report shows **independent scientists are concerned that Alaska is headed down the same path** as every other state which once boasted healthy bear populations
 - **Current regulations are outdated and fail to recognize the important role beaver habitat plays in healthy ecosystems for fish, birds and other wildlife.**
- Thank you for your time concerning this extremely important matter. May you make the choice that your conscience is able to bear.

Best,

Sharon Carson



To Whom it May Concern:

I oppose 35, 36

My name is Kim Bean and I am completely disturbed by this barbaric, unethical and inhumane means of killing ANY animal. Wolves have been and continue to be a big part of the Alaskan landscape, and a necessary part of the equation that keeps Alaska as our last wild frontier. What gives you the right to destroy these apex predators, and what is your true purpose for it? Your belief that man is entitled to these wild lands is a great human misconception and will eventually backfire.

I DO NOT support this means of killing the wolves or any other predator. This barbaric means of killing along with trapping need to stop, you have absolutely no scientific reasoning for these mass killings other than greed and entitlement. These lands belong to all Americans, and the majority do not agree with, support or condone your motives let alone your need to kill wolves for personal hatred or gain.

As a tourist that spends a great deal of money in the great state of Alaska, all for the purpose of seeing wolves and other apex predators in their natural habitat, I implore you to think of the ramifications that this will have on tourism dollars in the future.

Regards,

Kim Bean
Montana resident
Wildlife supporter



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 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



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 support proposal 43 and urge the Board to update regulations regarding trapping "nuisance" beavers as a means of controlling property damage. Current regulations are outdated and fail to recognize the importance of beaver habitat as part of a healthy ecosystem for all other wildlife. Present regulations fail to consider alternatives, including installation of beaver pond flow devices to prevent property damage.

I also support proposal 127 which would prohibit black bear snaring. Experimental snaring has killed hundreds of bears over the past three years, including black bears, brown bears, sows, and sows with cubs. If the Board of Game approves this cruel and indiscriminate practice, virtually anyone could apply for a permit to snare bears. Independent scientists are concerned that Alaska's bears will suffer the same fate as bears in every other state that once had healthy bear populations.

Again, I strongly support both proposal 43 and proposal 127, and I urge the Board to update regulations regarding trapping "nuisance" beavers and to prohibit black bear snaring. Thank you for your consideration of my comments.

Lynn Driessen



To Whom It May Concern:

I would like to provide my opinion countering the support of aerial killing of Kenai wolves.

At this point, the wolf population is under control and other factors have proven to contribute to the diminishing game animal population.

Why not focus on these other contributions for the time being?

Common sense dictates that although we can always take away, we cannot always regain.

A better solution to wolf slaughter is wolf capture. Capture troublesome wolves and send them to conservation centers.

Although this solution is more costly, it is worth it to protect diminished forms of wildlife of all forms.

Alaska is known worldwide for natural beauty, and little else. By hurting the state's one attraction, you are hurting its people.

Please consider this solution.

Thank you for your time.

Scarlett Cooley
nursing student, age 20

The ADF&G's own research clearly shows that in GMU 15A habitat is what is limiting moose populations, and even if wolves are killed the moose will still have far too little to eat.

In GMU 15C, moose population goals have been met and the killing of wolves would constitute a blatant attempt at game farming. The result would be significant negative impacts on the integrity of the ecosystems.

Another issue in 15C is the well-documented sustained peak in the hare population. When the hare population is this high they constitute a major part of the wolves' diet. Therefore, killing wolves would be counter-productive because hares feed on the same willows which are a staple food supply for moose.

The Kenai Peninsula is a world-renowned, year-round recreation area for Alaskans and visitors alike, and supports several population centers. Indiscriminate aerial wolf hunting would be contradictory to the lifestyle and economy of this area.



Dear Board of Game,

I am requesting that you please consider **opposing** proposals 35 & 36.

Some of the issues that have been brought to my attention by the Alaska Wildlife Alliance include:

- The ADF&G's own research clearly shows that in GMU 15A habitat is what is limiting moose populations, and **even if wolves are killed the moose will still have far too little to eat.**
- In GMU 15C, moose population goals have been met and the **killing of wolves would constitute a blatant attempt at game farming.** The result would be significant negative impacts on the integrity of the ecosystems.
- Another issue in 15C is the well-documented sustained peak in the hare population. When the hare population is this high they constitute a major part of the wolves' diet. Therefore, **killing wolves would be counter-productive because hares feed on the same willows which are a staple food supply for moose.**
- The Kenai Peninsula is a world-renowned, year-round recreation area for Alaskans and visitors alike, and supports several population centers. **Indiscriminate aerial wolf hunting would be contradictory to the lifestyle and economy of this area.**

I am also requesting that you please consider **supporting proposals 43 & 127.**

Some of the issues that have been brought to my attention by the Alaskan Wildlife Alliance include:

Proposal 43 asks the BOG to update regulations regarding trapping "nuisance" beavers to control property damage. **Current regulations are outdated and fail to recognize the important role beaver habitat plays in healthy ecosystems for fish, birds and other wildlife.** Specifically, current regulations fail to consider the installation of beaver pond flow devices as a method of preventing or alleviating property damage.

Proposal 127 would prohibit black bear snaring. The **Alaska Center for the Environment** submitted this well-researched proposal that we ask you to support for the following reasons:

- **Hundreds of bears have been killed over the past three years after being caught in a snare,** including black bears, brown bears, sows and **sows with cubs** in this ADF&G "experiment".
- This indiscriminate and cruel practice is spreading throughout the state, and **if the BOG approves this, anyone will be able to apply for a permit to snare bears.**
- A recent scientific report shows **independent scientists are concerned that Alaska is headed down the same path** as every other state which once boasted healthy bear populations.
- I live in New England but my love of wolves and bears inspires me to advocate for them. Please consider helping to protect Alaska wildlife.

Thank you,

Charlotte Markey
16 Whispering Pines Road
Richmond, R.I. 02898



I respectfully OPPOSE:

Proposals 35 and 36 allowing wolves to be shot from planes or helicopters, or ANY airbourne Hunting of wolves. The wolves belong to US too, and should not be slaughtered to serve the preferences of a few over the desires of the many.

I respectfully SUPPORT:

Proposal 43 updating regulations regarding trapping, and Proposal 127 prohibiting bear snaring.

Again, wildlife should be managed using a scalpel, NOT a sledgehammer, and by those professionals who work with wildlife interests at heart, NOT the few hunters who profit from hunting for pleasure, rather than sustenance.

Sincerely,

Kat Malstead



Dear Sir/Madam:

I am vehemently **opposed to Proposals 35 and 36 and am supporting Proposals 43 and 127.**

Please do the morally right and economically wise thing.

Thank you,

Dr. Maria Proietti



Dear Alaska Department of Fish and Game.....12/28/2011

I write to you today to please ask you to **stop proposals 35 and 36** which would allow the aerial killing of Wolves on the Game Management Units of the Kenai Peninsula..I oppose the killing of the Kenia Wolves by aircraft.

Please consider that not all people are hunters and many people that live in Alaska do not hunt! People visit Alaska to see the wildlife including the Wolves. Disruption by killing Wolf families is not healthy and not good Wolf Management. Wildlife is suppose to be enjoyed by all, not just special interest groups like the Hunting Industry. The Kenai Wolves are part of that special Wildlife so many of us love to see wild and free

Please let the Kenai Wolves live their life in peace..they are only trying to survive in this world just like you and I....Killing them is so wrong.

Please stop both proposals 35 and 36.and let them be free to live!

Thank you for your time

Anita Chittenden
South Lake Tahoe, Ca.



Dear Board of Game,

Please accept my comments relating to your upcoming meeting in January, 2012.

I **oppose Proposal 35** - 5 AAC 92.125 Intensive Management Plan **AND Proposal 36** - 5 AAC 92.125 Intensive management implementation plan. I DO NOT support "aerial shooting as a method of wolf removal." Please keep in mind the important role that wolves play in ecosystems, in this case, they keep hare populations in check. Otherwise a large hare population can have a detrimental effect on the future stand density of willow trees which serves as an important food source for moose.

I **support Proposal 43** - 5 AAC 92.041 Permit to take beavers to control damage to property. I prefer the use of "beaver flow devices" over killing beavers, which like other wildlife species, play an important role in ecosystems.

I **support Proposal 127** - 5 AAC 92.095(a)(20) Unlawful methods of taking furbearers; exception. Any animal can fall victim to a trap or snare.

Sincerely,

Carla Porter
5820 Sunderleigh Drive
Sunderland, MD 20689



Please don't kill Alaska's wolves. They are a national treasure. Those living with wolves who appreciate their necessary part in our planet's ecosystem and people like myself who only dream of one day seeing a wolf in the wild implore you not to cave to non-science based interests. Once something is gone, it's gone. We owe it to our future generations to let nature be natural and not interfere by committing the horrible murders of our magnificent wolves.

Respectfully,

Cynthia A. Heiden
Minooka, IL



To the Board of Game,

I oppose 35 and 36

When I was about 6 years old, (born 1961 in Sweden where I grew up) I saw aerial killing of wolves on TV. It was such an immense shock to me, that to this day, I cannot remember anything that penetrated my soul deeper. I cried in a way I have never done before or after as the pain I felt sent shockwaves through my whole being. What you do to these highly intelligent and beautiful animals is more than just a crime, it is a GRAVE SIN.

Wolves are profoundly misunderstood, they have high morals and kill just to eat, ie, survive, like any other carnivour, and they are part of keeping the natural balance on earth, the one which HUMANS are destroying. WE are the only evil species on the planet and WE threaten the extinction of every creature including ourselves.

The act of shooting wolves from the air is the ultimate act of cowardness and evil. If you do not take immediate action to outlaw this, I know for a FACT that you are guilty of a something that will send ripple effects not only physically by killing them, but spiritually, that will cause even greater evil. You can stop this, and you need to STOP IT NOW.

Sincerely, Marianne Widmalm



Hello, in relation to the conservation of the magnificent animal is the wolf want to tell you: I **object to proposals 35 and 36**, but I **support the proposals 43 and 127**.

You can live in harmony with nature, human beings have the intelligence to do

Regards
Javier Rivera



Opposing 35 , 36

Please help keep what makes us human, human...Once we loose this we loose our very humanity...Once this is gone, just exactly what are we when we are the ones with the capacity to reason? Please stop the hunting of wolves and their families. I am American Indian and am asking from the bottom of my heart, again....

Brian Armer



To: Alaska Board of Game

From: Scott Chesney P.O. Box 84396, Fairbanks, AK 99708

Re: Proposals 35, 36, 43 and 127

I **OPPOSE proposals 36 and 36**. As a sure you're all aware, there is **NO** scientific evidence supporting the notion that predation is the cause of lower population numbers for moose in the Kenai, while every piece of data shows that it is the result of poor moose habitat because of overzealous fire suppression. It disturbs me a great deal that these proposals have gotten as far as they have – it suggests a desire to manage game politically, not scientifically; the political management an artifact of the short-sightedness of the legislature in its designation of consumptive use of game animals as the best and highest use.

I **SUPPORT proposals 43 and 127** The regulations with respect to beaver management are seriously outdated and need to be updated. Proposal 43 is a reasonable approach.

Snaring of bears should not be allowed. Snares are indiscriminate and very coarse tools. In the very limited instances where it is appropriate, it should be permitted for only very experienced ADF&G employees, not the general public



Hello,

My name is Mariana Aprile Bittencourt, and I'm a biologist from Brazil. I'm writing you about the the airborne killing of wolves, I must say that **I'm against it**. As a professional biologist , I ask you to consider the following points:

- The ADF&G's own research clearly shows that in GMU 15A habitat is what is limiting moose populations, and **even if wolves are killed the moose will still have far too little to eat**.
- In GMU 15C, moose population goals have been met and the **killing of wolves would constitute a blatant attempt at game farming**. The result would be significant negative impacts on the integrity of the ecosystems.
- Another issue in 15C is the well-documented sustained peak in the hare population. When the hare population is this high they constitute a major part of the wolves' diet. Therefore, **killing wolves would be counter-productive because hares feed on the same willows which are a staple food supply for moose**.
- The Kenai Peninsula is a world-renowned, year-round recreation area for Alaskans and visitors alike, and supports several population centers. **Indiscriminate aerial wolf hunting would be contradictory to the lifestyle and economy of this area**.

Plus, I would like to live my support to the following subjects:

Proposal 43:

update regulations regarding trapping "nuisance" beavers to control property damage. Current regulations are outdated and fail to recognize the important role beaver habitat plays in healthy ecosystems for fish, birds and other wildlife. Specifically, current regulations fail to consider the installation of beaver pond flow devices as a method of preventing or alleviating property damage.

Proposal 127, that prohibits black bear snaring.

- **Hundreds of bears have been killed over the past three years after being caught in a snare**, including black bears, brown bears, sows and **sows with cubs** in this ADF&G "experiment".
- This indiscriminate and cruel practice is spreading throughout the state, and **if the BOG approves this, anyone will be able to apply for a permit to snare bears**.
- A recent scientific report shows **independent scientists are concerned that Alaska is headed down the same path** as every other state which once boasted healthy bear populations.

Mariana Aprile Bittencourt



Kimberly C. Kellar
5720 W Crestview Avenue
Wasilla, AK 99623

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

December 28, 2011

ATTN: Board of Game Comments

I am writing to **oppose proposals 35 and 36** that would allow airborne killing of wolves in the two Game Management Units on the Kenai Peninsula. Please don't pass these two proposals. it's just passing the buck that would allow hunters to buy into an unnecessary killing. No money in the world can buy them back, and this is why they should be protected from these unnecessary killings. If this passes it would be a large spotlight and scourge on those not courageous enough to not look at money, but look at what is right. This would be a negative nation-wide audience all coming to your doorstep asking why. There simply is no determinant research or study to approve to any of these practices.

I am also writing **in favor of proposal 43** to update regulations regarding trapping beavers to control property damage. They should be moved to a different area, where they can co-exist, not killed and tortured in traps. Here again, there is not sufficient studies or research done to inevitably say that such a drastic measure of trapping is of any necessity.

Lastly, I am writing **in favor of proposal 127** that will prohibit black bear snaring. It is not only cruel and a terrible way to 'snare' a bear, it shows total disregard to the negative impact this has on bear cubs. It promotes complete violence and torture and gives the go ahead for any would be if I could type of people who simply want to make a profit off the backs of these poor bears.

Dear Board of Game; we 'are' the great frontier, people visit our beautiful state because of all her natural beauty, we should respect our wilderness nature, and pray God, we will stand together to protect her and her inhabitants. Don't waiver, Don't be sold, Don't give in, please do what is right for our wildlife and for our great state of Alaska.

Thank you,
Kimberly Kellar



Dear Madam, Sir,

Oppose 35 36

I was very sad to hear that aerial killing of wolves in the Kenai area is still continuing.

The aerial killing of wolves is not fair. The wolf is a premium predator which is very important to keep natural balance.

We would love to welcome the wolf back in western Europe. The wolf is a good predator in natural circumstances. Farmers must supply good livestock protection like in the olden days.

We have similar problems with the fox, but we are not culling them. They are part of our ecosystem.

Yours sincerely,

Joost Ligthart
the Netherlands



Dear Alaska,

As an avid wildlife supporter, I am writing to tell you that I strongly OPPOSE measures 35 & 36 and strongly support measures 43 & 127.

I love wolves and wildlife and it is a crime what you are doing to this wonderful species. I would love to visit Alaska, but will not until you cease this horrible practice.

Rachelle Parks
240 Day Valley Rd.
Aptos, CA 95003



Oppose 35, 36

Please stop the barbaric killing of our wildlife. The ecosystem is being altered by human trespassers. It is not part of the natural world order. The wolves are not being hunted for food. We have grocery stores now. Please stop this insanity. Also, aerial hunting is not really a sport. It is one sided.

I implore that you help put a stop to this.

Tina Siragusa



Oppose 35 and 36

My Family and friends Strongly OPPOSE these proposals to the fullest extent possible. What is wrong with people that cannot understand that Wolves are a very important part of our ecosystem and have been for hundreds of years until man decided to step in and do his part which is and has been nothing but counter-productive to our wildlife structure.

Obviously these hunters who decide to take part in this unfair brutal attack on these animals that are just killing and eating only what they need to survive and feed themselves and their young, unlike the game hunters that kill the caribou and moose to hang the head in their den for bragging rights and maybe donate the meat to a homeless shelter for a warm fuzzy feeling that they are doing something spectacular when it only involves these innocent Wolves being killed for existing.

What makes me wonder so much is that our world and especially our own country here in the U.S.A. has billions of DOG LOVING people that treat their dogs like children, how many of these wolf Killers have a black lab, a Maltese, beagle, Boxer or some sort of Canine Companion waiting at home for them when they return from their aerial assault on their dog's Ancestor and creator . I wonder what their dog would tell them if they could talk about what their master had been out doing all day with his Rifle I think they would Howl all night that their great Ancestors had been murdered and in a unfair way as well. Too bad Wolves can't hold a Rifle and shoot back, that may change the game a bit wouldn't it?

Please oppose these bills . We need these Great animals in our world or else we won't survive either in the long run.

Jeff Love



How come, that in a state that was/is proudly called "the last frontier" nearly every 4-legged creature gets hunted and gunned down?
Why is this state not proud of them and protects as much as possible of them?

Stop the aerial gunning of Alaska's wolves!

And by the way, where is the "sport" in gunning down an animal from the air?

Christa Niederreither
St-Lazare-QC-Canada



I understand that to you this is just another plea from another wolf activist, but please take the time to read this, as with others, and truly understand what our goals are.

Although we might not agree or understand the thoughts behind killing these magnificent animals, we understand that each state feels an obligation to keep it's constituents happy. Having said that, please ask yourselves this question: Is the killing of these animals really what's in the best interest of your state, it's ecosystem, and it's future? Society has become entwined in a power struggle with who has the most money and what it can buy. Everyone thinks that their opinion is the right one and if they have the money, pushes their opinions onto others. This is the case with killing the wolves.

It has been shown time and time again that by removing the wolf it upsets the balance of nature. And once again the question of aerial hunting comes into question. The killing these incredibly intelligent, beautiful animals in such a horrible way is done for sport only. You can spin it anyway you want, but it comes down to a sport.

The last few months have been very hard on the wolf lovers of the world with the celebratory actions of the wolf hunters. We sit back and watch the rewards, celebrations and editorials of those who want to once again eliminate the wolf from existence, and we cry not only for the loss of life but for the barbaric enjoyment of death that is exhibited.

Please give the wolves of Alaska a fighting chance for survival and eliminate aerial hunting and shooting of the magnificent creatures.

Thank you for taking the time to read this and my God bless you with the strength to do the right thing.

Susan Bond



OPPOSE 35, 36

Dear Sirs,

Once I remember voting and then we voted again, and again and once more after that and each time the results were the same. WE WERE OPPOSED NOT ONLY TO YOUR METHODS BUT OF WOLF SLAUGHTER.

When have we become a dictatorship? When have you classified yourselves as gods? Why is the public constantly made to approve of your malicious, torture and ill use of our wilderness?

When can we expect to find a government agency that respects the land, the wilderness and its wildlife and us?

Sincerely,

Geneva Craig and Linda Feiler
PO Box 148
Anchor Point, Alaska 99556



I **oppose Proposals 35 and 36**, which provide authorization for airborne killing of wolves. Killing wolves in this manner is stupid, cruel and inhumane, ruining the family unit which allows the wolves to maintain breeding and hunting packs.

Wolves are a vital part of a healthy ecosystem, allowing the culling of sick, old and injured game animals. This is not the same as hunting by humans, which takes healthy breeding animals out of the system, which weakens the system, and has been shown scientifically to be the beginning of the end for our wilderness.

Every animal in the wilderness has a purpose, from tiny rodents, a scientifically proven prey of wolves, to beavers, deer, moose, wolverines, to the apex predator, the wolf.

You are set to make changes in the ecosystem that will compound our problems in wildlife management without sufficient knowledge or research to know the results.

I **support Proposals 43 and 127**.

I urge you to listen and pay attention to the work of wildlife biologists before trying these impulsive and horrible measures that, once instituted, have outcomes you cannot predict, and cannot control.

Thank you,

Ty Beh
1717 32nd St.
Rio Rancho, NM 87124



Humans kill whatever gets in their way including each other.

This killing of the wolves is not necessary! They are not taking anything away from the ecosystem instead they are a positive life needed to balance out the environment. There are more rabbits for them to help control the population. They are not the reason the Moose do not have enough to eat.

The killing of the wolves would constitute a blatant attempt at game farming!

To see that beautiful, intelligent wolf dangling from the wing of the airplane is a sad & ugly way to treat a noble fellow creature that deserves dignity & our friendship.

I wholeheartedly **OPPOSE PROPOSALS 35 & 36.**
I wholeheartedly **SUPPORT PROPOSALS 43 & 127.**

Frances Martin
P.O. Box 6403
Carmel, California



BOG:

Stop the killing of wolves from the air. They belong to the U.S. not you.

Michael Banks



ALASKA DEPT. OF FISH & GAME,

I strongly **oppose the blatant aerial killing of wolves**. These acts are solely designed to pamper special interest commercial hunting organizations and that in itself should be a crime. You know it & I know it.

I would also like to take this time to voice my **support for Proposal 43 & Proposal 127**. Wildlife is a precious commodity that needs to be left to the workings of Mother Nature & ANY unscrupulous acts used to "hunt" our precious commodities need to be addressed immediately.

Your determinations concerning these proposals are being watched worldwide & will be exposed for what they are. Choose wisely.

Sincerely, Doug Tielbur - Wisconsin



I strongly oppose aerial killing of Kenai wolves.

Kim Ogden-Avrutik, Dr.P.H.



Hello,

I am writing you to show my **opposition to proposals 35 and 36**. These proposals appear to be clear attempts to create a hunter-friendly environment for moose, even though the local ecosystem is being damaged by the moose population (due to eating too much of the plant life). Wolves will help keep the population numbers down so the damage does not become permanent. Clearly the removal of wolves from this area is to create an area where hunters can go in and kill the moose themselves. (OK, so wolves killing moose is wrong but humans killing moose is not?).

Wolf hunts work towards evolution - they chase the herd and attempt to split up the herd and in the process some, usually slower animals, will get singled out and hunted. This allows the stronger ones to survive to breed and make the overall species stronger.

Hunters usually do the opposite - they hunt the largest and healthiest animals they can find thus reversing evolution. This can have a drastic effect on any species.

Wolves will also keep the over-abundant hare population down, which also feed on the same plants that the moose do.

I would also like to voice my **support for Proposal 43**. Beavers play an important role in any healthy ecosystem (like all animals) and if you limit their numbers you can have drastic effects on several species. Beaver dams help build ponds which create a healthy environment for fish, insects and what preys on them (birds, bears, etc.).

I also **support proposal 127** - prohibiting snaring of black bears. Snare traps are indiscriminate and will trap anything that gets in their way. The victim is then left defenseless and without food or water, possibly for days, and usually in pain. There are also countless reports of people and pets getting caught in traps. Do you really want tourists to avoid the state because they fear being caught in a trap?

I truly hope the right decision is made to help support and preserve Alaska's unique ecosystem and not allow it to fall victim to money and special interests like it has in many other states.

Take a look at Florida's ecological history. We had the same problems and almost destroyed areas like Lake Okeechobee, The Everglades, and countless river systems in the state. Not only that, the Florida panther is struggling to survive after being close to extinction, non-native boa constrictors are ruling the Everglades causing massive ecological damage, and urban sprawl is causing massive damage to the ecosystems. We have been working for many decades to try to repair the damage that has been done but for some, like the Florida panther, it may be too late.

-Ed Blood
Fort Lauderdale, FL



Dear Sirs,

Being from a foreigner country, I can assure you that many wildlife lovers see aerial gunning of Alaska's wolves like a horrific, cruel and terrible act against these majestic animals. Please, don't allow that Alaska is seen like a territory that prefers to be corrupted by cruel people rather than to protect Alaskan treasure - wildlife and your gorgeous wolves.

There is growing number of people who prefer to watch and study nature, rather than destroy it. There is definitely growing number of people who love animals to watch and observe, to protect them and not to kill them to feel "powerful". Many people consider such a kind of entertainment like hunting wolves to be cruel and a symbol of the past. A modern strong person protect animals and all nature, a modern strong person dedicate his/her force to fight cruelty like is aerial gunning of wolves, trapping, abusing animals...

Alaska is so beautiful and it would a great shame to see it dirty by blood of such a cruelty like is hunting of wolves. Alaska should show to the world that you are aware of your beauty and how you highly protect it, esp. your gorgeous wolves who are a symbol of wild nature.

JS Angela



Hello!

Herewith I let you know i have a strong protest against the killing of the Kenai wolves.

It's very important the wolves live in a stable wildlife situation, some may not be disturbed a human by killing wolves, bears etc.

I support and give my voice to the Alaska Wildlife Alliance.

Petra Bloemendaal
Sweden



OPPOSE 35,36

I am so sick of the Board of Game allowing wolves to be shot from the air. There is no reason for that. The balance of nature will take care of how many animals are out there. Stop trying to change that.

Just because some fool wants to pay a lot of money to kill from the air does not make it right. There is no biological reason to allow this. The only thing I hate about Alaska is the "if it's out there, we can kill it mentality." Leave the wolves alone. Stop hunting for trophies. These are animals, not trophies. They are here to help us live. It is our duty NOT to indiscriminately kill them. It's barbaric. It's a step backward in human evolution. LEAVE THE WOLVES ALONE.

Donna Quante
Willow, AK



35, 36 oppose

Hello,

I first went up to Alaska with my father in 1958 to see wildlife. He was a pilot. It's something that should be preserved, not destroyed.

I'm writing to voice my opposition to your proposals 35 and 36 regarding hunting wolves. Leave the wolves alone please.

I support propositions 43 and 127. Trapping and animal control can be done more responsibly.

Thanks

Alexander Reed

Alexander Reed
11 Greenwich Ct
Oakmont, Pa 15139



I OPPOSE FULLY and VEHEMENTLY proposals 35 and 36 regarding the authorization for the airborne killing of wolves in two Game Management Units on the Kenai Peninsula. This is nonsense. Before long, wolves are going to be extinct because of the hatred of these beautiful and majestic animals.

Sincerely,

Dr. Kendra Ehlich Elliott



Oppose 35 , 36

It is really unnecessary to kill wolves for any reason--they are not killed for meat. Haven't we learned from Africa's problems with trophy hunting. But really -- aerial hunting? What kind of creatures are we?

--

From
Honey Elovitz



Do NOT kill the wolves!

I am writing to express my concern over aerial gunning of wolves. There is no science to support such a brutal tactic and I oppose it. Your own information on GMU 15A points to a lack of forage rather than an over abundance of predators. In 15C removing wolves would only create a larger problem with the hares. I have visited the Kenai and will do so again. Your plan to kill wolves in this area would not encourage me to visit again, I want to visit an area with all the wildlife not some place cleaned of everything except huntable wildlife.

Nancy L Kaminski
General Delivery
San Lorenzo, NM

"One of the penalties of an ecological education is that one lives alone in a world of wounds. Much of the damage inflicted on land is quite invisible to laymen. An ecologist must either harden his shell and make believe that the consequences of science are none of his business, or he must be the doctor who sees the marks of death in a community that believes itself well and does not want to be told otherwise."

-Aldo Leopold-



I am opposed to the proposed aerial gunning of Alaska's wolves.
Please protect the beauty of Alaskan wildlife save the Wolves !

Sincerely,

Margaret R. Macy



Alaska Board of Game,

I am writing to you to share my strong opposition for proposals 35 and 36, .

These proposals are not science based, I am a strong supporter of the PAW Act which is totally being ignored once again, when considering airborne killing of wolves in two Game Management Units on the Kenai Peninsula. It is disturbing that the BOG requested this action, and it was not supported by the Alaska Department of Fish and Game biologists. Why do you feel the need to continue to serve the special interest groups in Alaska, with introducing such proposals as 35 and 36? Rest assured we at National Wolfwatcher Coalition will continue to advocate against these destructive proposals in the great state of Alaska.

Sincerely,
Dave Hornoff

Dave Hornoff (Co-President)
National Wolfwatcher Coalition
Understand, Love, Protect



I oppose 35 and 36

Gentlemen,

The basic premise used to legitimize aerial shooting as well as other ways of decimating a wolf population, is that wolves are by definition a pest which needs to be controlled and held down by humans. Some human hunters try to justify this by the wolves' allegedly destroying hunting, which is a rather thin justification because it explicitly states that human interests must always be set over those of Nature and the living animals.

In Minnesota, there is a population of approximately 2600 wolves. It is estimated that these 2600 wolves kill and eat 40 000 whitetail deer every year. Human hunters with their guns likewise kill and eat 40 000 whitetail deer annually. The ecosystem in Minnesota seems to be in balance in the sense that neither predator destroys the prey base, and a similar sharing of prey between top predators (as in this example between wolves and humans) can be established elsewhere as well.

In a healthy ecosystem, there will always be prey for both humans and four-legged predators to hunt. This is convincingly documented by the Minnesota example. Thus, the problem is not the wolves' hunting, but some human hunters' inability to accept that they must share the prey with a four-legged fellow hunter even if it means that their share will not be so big.

Hunters who want to seriously reduce the number of wolves or even exterminate them, need to be made aware that this is an ecologically destructive thing to do. An optimal ecosystem contains wild predators which can exert a healthy predation pressure on their prey by challenging the animals in a lot of ways that human hunters alone cannot. Moreover, in the long run it cannot be avoided that people are going to associate extermination programs carried out on behalf of hunters with the very tradition of hunting. This is potentially damaging to future hunters' possibilities to harvest in Nature. If hunters are viewed as ruthless killers who are unable to accept to share their prey with the furry hunters of the wilderness, they are effectively contributing to the undermining of hunting. This is unfortunate and also unnecessary. All that is needed is that hunters understand the necessity of responsible hunting, where the hunters refrain from harvesting any more than dictated by the area's carrying capacity and the biological limits for what the prey population can tolerate, and where they accept that wolves and other wild hunters must be equally entitled to their part. It is imperative to realize that human hunters have no greater right to prey than the wild predators. Responsible hunting which merely harvests from the surplus of Nature is not biologically wrong, but when humans demand "wolf control" and advocate large-scale killing and reductions of natural predator populations because of a desire to increase their own share of prey animals, they behave irresponsibly and must change their ways if they want to be responsible participants in Nature's great whole.

Please Reject the Plan for Aerial Wolf Hunting, thank you.

Sincerely,

Steven H. Clevidence
po box 190
Victor, Mt. 59875



Oppose 35 and 36

Please take the time and stop the killing of the wolves!!
They are a vital part of the wild and they deserve to live
there!! I visit a lot and would hate to not see them as
well as pass the word to visit somewhere else!!! Thank you
for your time!!

Robin Stafford



Oppose 35 and 36

The aerial shooting of wolves must stop. This is an inhumane death of the wolf. Aerial killing subjects the wolves to a terrible lingering and suffering death. It is INHUMANE!!!! This practice should be banned.

Regards, Annemarie Maag



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

I OPPOSE BOG Proposals # 35 and #36 - These proposals provide authorization for the airborne killing of wolves in two Game Management Units on the Kenai Peninsula. They are simply an anti-science "gift" to the special interest commercial hunting organizations, and were requested by the BOG itself, not Alaska Department of Fish and Game biologists.

The ADF&G's own research clearly shows that in GMU 15A habitat is what is limiting moose populations, and even if wolves are killed the moose will still have far too little to eat.

In GMU 15C, moose population goals have been met and the killing of wolves would constitute a blatant attempt at game farming. The result would be significant negative impacts on the integrity of the ecosystems.

Another issue in 15C is the well-documented sustained peak in the hare population. When the hare population is this high they constitute a major part of the wolves' diet. Therefore, killing wolves would be counter-productive because hares feed on the same willows which are a staple food supply for moose.

The Kenai Peninsula is a world-renowned, year-round recreation area for Alaskans and visitors alike, and supports several population centers. Indiscriminate aerial wolf hunting would be contradictory to the lifestyle and economy of this area.

I SUPPORT BOG Proposal #43 – this asks for updated regulations regarding trapping "nuisance" beavers to control property damage. Current regulations are outdated and fail to recognize the important role beaver habitat plays in healthy ecosystems for fish, birds and other wildlife. Specifically, current regulations fail to consider the installation of beaver pond flow devices as a method of preventing or alleviating property damage. (See the in-depth article in the Summer 2011 issue of Alaska Wildlife Echoes entitled "Beavers, People and Officialdom: the evolution of cooperation in Juneau" for more information about the Beaver Patrol's extensive work with beaver habitat.) This proposal was submitted by AWA-SE Board member and Beaver Patrol member Patricia O'Brien.

I SUPPORT BOG Proposal #127 - this would prohibit black bear snaring. The Alaska Center for the Environment submitted this well-researched proposal that I ask you to support for the following reasons:

Hundreds of bears have been killed over the past three years after being caught in a

P 1/2



Oppose Proposals 35 and 36

I am writing with regards to the planned wolf kill. I must say this is a big disappointment to see that the people in power are considering such an unfounded decision and completely ignoring good sound judgment on how we should be preserving one of the most pristine part of the natural world still left for us to enjoy.

When will we put money and machismo aside for far greater values. Are people that insensitive, shallow and ignorant that they can't see past the fact that for many decades now, regardless of ecosystems, it is well established that nature finds its own balance based on climate, available vegetation and a equilibrium between herbivores and carnivores. Millions of years of evolution has created a system that works and works well. Works well for the benefit of ALL i.e.) vegetation, herbivores and carnivores. The right balance assures that all living things are maintained healthy and thrive.

There is a good many of us that understand and cherish this type of environment and understand that the animals high in the food chain such as wolves and bears play a critical role in maintaining a healthy environment. These animals have been persecuted for no logical reason. Anyone that can find a little bit of time to invest and learn about the complexity of these carnivores and how challenging their lives are to maintain survival will learn to appreciate them and want to share the planet with them. They have developed such specialization, intelligence and complexities that one can only be awed at their beauty and vulnerability.

Unfortunately many of the member of our species have not reached these heights yet and only revert to caveman mentality by clubbing to death what they don't understand. What little man can find joy in the persecution of shooting a defenseless and beautiful animal from a flying aircraft using a high performance shotgun.....shame on you.

Eva Schorer



snare, including black bears, brown bears, sows and sows with cubs in this ADF&G "experiment".

This indiscriminate and cruel practice is spreading throughout the state, and if the BOG approves this, anyone will be able to apply for a permit to snare bears.

A recent scientific report shows independent scientists are concerned that Alaska is headed down the same path as every other state which once boasted healthy bear populations.

Karen Davison AMACC,
Member of the Animal Care College
Tralee, Co Kerry

p. 2/2



Oppose 35 36

Good morning,

A dear friend of mine told me about the aerial killing of wolves. We do not have any wolves left in The Netherlands. We used to have wolves though, but due to overpopulation of humans, they left or were killed.

I think it is a terrible waste to kill any living creature if not for your own survival.

Please, please do not allow the killing of the Kenai Wolves!!!!

I wish you a lot of wisdom. And hope for a good year for the wolves next year!'

Thank you!!!

Leila Konijn
The Netherlands



To: Alaska Dept. of Fish and Game
Subject: Aerial Wolf Killing

Dear Board of Game:

As a lifetime Alaskan and Homer resident, subsistence hunter and local farmer, I am **opposed to the aerial killing of wolves on the Kenai Peninsula; specifically the BOG proposals 35 and 36**. I grew up on moose meat, but we never thought the moose were only "ours". The moose and wolves were here before us.

Right now the snowshoe hare population is out of control in this area, destroying acres of moose browse, not to mention fruit trees, shelter belts, windbreaks, and the nursery stock on my farm. I have spent thousands of dollars on fencing against hares, as well as having to protect my trees against the very plentiful moose. What we need are more predators, not fewer, even if it means tightening our belts for awhile and going without this habit of so called "free" moose meat which is costing the state hundreds of thousands to "protect"-- for the interests of the few!

This winter I have seen a wolf with a hare in its mouth up in the hills, which made me very happy indeed. There is not enough habitat around to feed the amount of moose needed to feed our rapidly growing human population; where will it end? Should we get rid of all the wolves, coyotes, bears and lynx for our own selfish ends? It would make more sense to allocate our precious state money toward the support of our struggling agriculture and beef industry on the Kenai, which in the long run will feed far more people than a few "game farmed" wild moose ever will.

I would like to personally see the state put a moratorium on lynx and coyote killing until the hare population is under control--we used to see and hear lots of coyotes and lynx right here in Homer until about 3 years ago...just when the hares took over. Coincidence? Should the "lifestyle" or rights of a few trappers and hunters trump the welfare, enjoyment and rights of the rest of us--and of Nature?

I am not a biologist, but have lived in the backwoods much of my life. Wolves and other predators are beneficial in other ways, their kills feed also the eagles and ravens, and magpies and gray jays, weasels and mink. These animals depend on the larger predators for their survival as well.

Please do not be shortsighted or one-sided in these decisions, consider the big picture. In the end we all depend on the big picture. We need a great



variety of animals for everyone's enjoyment-- the visitors, old timers, children, and our descendants. Wildlife --not just the moose--are a great economic plus in our area. I do not think moose hunters should have priority.

Also please note: I **support proposals 43 and 127**. I am one voter and Alaskan opposed to trapping of beavers--indeed of any animals--and in particular the snaring of bears. I think it is inhumane and cruel and makes me ashamed to be an Alaskan. And I am appalled how our state fish and game is so heavily dominated by the hunting interests.

Mossy Kilcher

Homer

p. 2/2



To Whom it May Concern,

One of my main motivations for moving to Alaska was to help educate people about wolves and put an end to the airborne wolf control. I feel I have failed them. I am saddened each and every year because it continues to be done and people are not learning. Wolves are one of the most mystical creatures who are greatly misunderstood. The barbaric nature of these hunts hurts my heart continuously. Please hear the voice of the people as we try to preserve these precious creatures, listen to the voice of the people who can speak for them. Our voices come from a deep understanding of their existence and the vital role it has played since their inception.

I am opposed to proposals 35 and 36. Please put an end to this senseless killing.

Thank you kindly,

Shannon Basner



I oppose Proposals #35 and #36

Dear BOG,

As an Alaskan I am horrified by the practices of the BOG toward predator species.

Simply put, proposals 35 and 36 will continue to destroy the precious ecosystem all of us respect and enjoy.

I have found it shocking the BOG is so eager to serve the needs of the few instead of the majority of us who strongly oppose such inhumane acts like aerial killing of wolves, denning, and while we are at it hunting and trapping in general.

I've lived in the bush a long time and I can tell you no one lives by 'subsistence' anymore. Everyone is shopping at Costco and AC and shipping it in. So, your proposals seem to serve the needs of trophy hunters and have little to do with sound science and real environmental protection.

Please oppose proposals 35 and 36.

While we are on the topic of inhumane acts. I would like to ask you to support proposals 43, and 127.

Snaring bears is a horrifying practice. In fact snaring in general is a cruel and inexcusable act. Imagine snaring a child, would you be able to sleep at night? This is also incredibly disturbing and I hope you will do everything possible to make this cruel practice stop.

We have so little wildlife left. Please do the right thing. Your children will thank you.

Regards,
Jennifer Meyer



I oppose 35 and 36

Hello my name is Tom. I was born in Alaska but never seen it before. One day I had hoped to return and see the Last Frontier but as I see there are people who wish to destroy the last frontier and the wildlife that lives in it. This weighs heavy on my heart and I fear for my wolf brothers and sisters and lets me know that humans know only how to destroy, so I ask you all to prove me wrong and do not follow some of the other states that choose to kill wolves. With those states it's to save elk and cattle - what are you killing wolves to save?

I ask only for everyone involved in making a decision on this vote to step back and ask yourself, do we really need to kill, how much of taxpayers money are we wasting on hunters and airplane fuel, have we even considered nonlethal measures in wolf population, and are we really educated on the wolf before you start killing them. And last, the fact that I'm from Ohio means the whole world is watching you right now so please consider my opinion before you vote and hopefully one day I will be able to see the last frontier before it's all gone.

Thank You, Thomas St. Laurent



I respectfully wish to voice my opposition to Proposals 35 and 36. I appreciate your willingness to accept input and feedback and to hear from the people.

The ADF&G's own research clearly shows that in GMU 15A habitat is what is limiting moose populations, and even if wolves are killed the moose will still have far too little to eat.

In GMU 15C, moose population goals have been met and the killing of wolves would constitute a blatant attempt at game farming. The result would be significant negative impacts on the integrity of the ecosystems.

Another issue in 15C is the well-documented sustained peak in the hare population. When the hare population is this high they constitute a major part of the wolves' diet. Therefore, killing wolves would be counter-productive because hares feed on the same willows which are a staple food supply for moose.

The Kenai Peninsula is a world-renowned, year-round recreation area for Alaskans and visitors alike, and supports several population centers. My family has spent tens of thousands of dollars visiting Alaska in the past - to enjoy its scenic sites, its wildlife and its history and majesty. I would like to continue supporting Alaska with our family's future tourist dollars, but will have to refrain if the wildlife I am willing to pay dearly to see is executed, against your own scientific findings.

Indiscriminate aerial wolf hunting would be contradictory to the lifestyle and economy of this area. These proposals are simply an anti-science "gift" to the special interest commercial hunting organizations, and were requested by the BOG itself, not Alaska Department of Fish and Game biologists.

Please consider abandoning these proposals and continue Alaska's majestic beauty by supporting the wildlife that rightfully belongs there!

Respectfully pleading for common sense, science and humanity to win out!

The majority of Americans oppose these types of proposals - please stand for us.

Thank you for your time and consideration.

Mark & Ruth Stevens



Alaska Board of Game Officials,

I am writing to comment on several proposals up for consideration at your next meeting in January. I vehemently oppose Proposals 35 and 36, and I support Proposals 43 and 127.

Proposals 35 and 36 would authorize the aerial gunning of wolves in two of Alaska's game management units. As someone who lives in wolf country myself (Montana's Gallatin Valley area), I do not approve of predator control of any sort. In the few places I know of where wolves have been left alone (e.g. Isle Royale and the Canadian Arctic), they have been able to maintain a reasonable balance with their prey. They are capable of regulating their own population without human interference; therefore, these proposals would simply represent needless bloodshed. Many hunters have other food sources to fall back on if moose populations are too low, so the wolves should be given priority when this food resource is allocated. The case for predator control grows even weaker when the following points are considered:

* The wildlife biologists at ADF&G did not express alarm at small moose populations and call for predator control. Rather, these measures have been requested by the BOG itself. I suspect that the BOG is acting at the behest of hunting special interests, and I denounce this tendency.

* The moose population has met management objectives in GMU 15C. In GMU 15A, the population is likely being limited by food availability, rather than predation pressure, according to ADF&G research. Therefore, I must question the utility of killing wolves in either of these units.

* Predator control has a spotty track record. According to my source, out of eleven attempts to boost game numbers in Alaska by controlling wolves, only three actually succeeded. (From "Wolf: Legend, Enemy, Icon") Michael Furtman, quoted in "Beyond Wolves," says, "Most hunters abandoned the notion of predator control for barely noticeable gains in game populations decades ago ... Grouse hunters don't demand the removal of goshawks to bolster bird populations. Anglers don't demand the gill netting of large pike or muskies to save smaller gamefish, or the shooting of osprey or bald eagles."

* The desires and values of tourists -- not just those of hunters -- should be considered. The Kenai Peninsula is a recreational area where people come to see wildlife, among other things. Slaughtering iconic animals like wolves, which tend to draw people to the area, is not good for the tourism economy and might even bring a boycott down on your heads. I will personally avoid vacationing in the Kenai Peninsula area as long as government-sponsored wolf control is in effect. This is not good wildlife management; it is more like animal cruelty, and I do not wish to support it with my tourism dollars.

Proposal 43 would update the regulations that cover trapping of nuisance beavers, to reflect a greater emphasis on non-lethal solutions and cooperation with beaver advocates.



Less death in the world is always good ... if it is possible to deal with problems without killing beavers, then that should always be the first plan of action. Please put this proposal into effect.

Proposal 127 would end the snaring of black bears. Many of my concerns about predator control apply just as well to bear snaring as to wolf control -- and on top of that, snaring seems to be an especially inhumane way to kill bears. The bears can endure serious psychological and physical distress while restrained by the snare, and may spend hours or days in this state, without food or water, while waiting for the trapper to check his snares. They may maim themselves while attempting to get away. Even bears with cubs have been killed in snares. Snares are indiscriminate and sometimes accidentally catch other wildlife, which may have to be put down due to injuries sustained while ensnared. Please ban bear snaring across the state of Alaska.

Thank you very much for considering my comments.

Jennifer Hane
Bozeman, MT

p. 2/2



Oppose 35, 36

TOP this inhumane and unnecessary practice NOW!!!

It is just an excuse to decimate wolf populations to benefit commercial hunting not wildlife and not moose populations. It will cause more harm to ungulate populations than good.

Jeremy Graham



Dear Sir (s),

I oppose proposals 35 and 36 and support proposals 43 and 127, as I am opposed to the aerial killing of wolves. Thank you.

Karen Uyeno



Most wolves are killed for sport or by bounty hunters, in memory of Hercules who was half wolf, I ask you to search your conscience and stop the AERIAL GUNNING of Alaska's wolves!!!

by Julie Finkelstein



I will be brief! Let's not turn Alaska into a game farm, managed solely for people who want to kill moose or other ungulates. Management methods need to be based on good science, good ecology, and respect for our wildlife species.

1. I vehemently oppose Proposals 35 & 36, re aerial wolf killing on the Kenai. The moose population there is documented to be limited by habitat conditions, particularly food availability. Wolves do not limit this population. If moose are perceived to be hard to find by humans, the humans have to become better hunters!

Aerial wolf control in these game management units is not based on science, indeed it is contrary to science. It is expensive, unnecessary, and —even IF more moose appeared, that would only benefit a few shooters (many not even living in AK).

2. I strongly support Proposal 43, re considering nonlethal methods of controlling damage by beavers. There are alternative methods (pond-levelers etc.) that can be effective in many cases. These alternative methods have the ecological advantage of maintaining the important habitats (for fish and wildlife) that beavers provide. The scientific literature documents the importance of beaver ponds for anadromous fishes, waterfowl, and songbirds. It is really important to consider nonlethal alternatives.

3. I strongly support Proposal 127, re prohibition of black bear snaring. This is a really cruel means of killing bears. The effect of reducing the bear population cannot be evaluated accurately and scientifically in the absence of measuring other possible factors influencing the prey populations. This program is NOT a proper experiment! Furthermore, allowing untrained persons to snare bears is likely to increase the level of cruelty to the bears, because such persons are more likely (we know from experience) to fail to check their traplines frequently and regularly, thus increasing animal suffering. Snaring should be prohibited.

Mary F. Willson
Juneau, Alaska



**I OPPOSE 35 and 36 (killing wolves) and SUPPORT 43 and 127
which will save other animals.**

Please do the right thing and protect animals.

**Thank you,
Matthew J. Zola**



As a concerned citizen and supporter of wildlife, I am writing to inform you that I **oppose Proposals 35 and 36 and support Proposals 43 and 127.**

There is no basis to continue this horrible aerial killing of wolves and the snaring of bears is atrocious.

Please consider dropping proposals 35 and 36 and supporting Proposals 43 and 127.

Thank you.

June E. Abner



Oppose 35 and 36

To Whom It May Concern :

Permit me to express my opinion on the aerial shootings of wolves. I have several reasons for thinking this is a terrible idea - both for the wolves (especially the wolves) as well as for those who value these impressive creatures.

Only an expert marksman with no wind turbulence or vibration would stand a chance of humanely terminating on the first shot from a moving plane/helicopter. Any miss of a direct shot would cause unnecessary pain and suffering to an animal only guilty of being itself. Not acceptable. How can the shooter identify the wolf target as an alpha or submissive babysitter, an identity that is very important in the wolf society ?

Who on earth makes the grandiose assessment as to how many wolves are too many? One would assume if there were a glut of them, that the animals on which they prey would be decreasing at a considerable speed, as well as the number of wolves falling victim to starvation and/or disease. Does that seem the case? I think not. So what is the reason behind this? Could it be that certain factions wish there to be a glut of the deer/moose/caribou etc in order to appease the bloodlust of the (two legged) hunters?

Something is terribly wrong here. I wish to go on record as being against this culling of the wolves, simply because it is not necessary, not humane and definitely not in the best interests of the *natural* population.

Thank you for taking the time to read this; I hope it makes a difference.

Lyn Pollard



Oppose 35/36

Dear Board Members,

It is with sadness that I write to you this evening after hearing about Proposals 35 and 36. Alaska has a rich heritage of wild lands and wildlife and as such I would expect Alaskans to cherish and protect the very heritage that makes the state of Alaska great. Only once have I set foot within the Kenai Peninsula, and it is a truly magnificent place that I plan to return to one day.

My understanding of the above mentioned proposals is that to benefit moose populations, aerial killing of wolves will be considered. Upon reading the article by Rick Sinnott, it is apparent that habitat is the main factor in limiting moose populations, not predators.

I urge you to do what is right, based upon sound management principles and sound science. I urge you to not support proposals 35 and 36, which if implemented will further tarnish the reputation of the state of Alaska regarding predator management.

We who cherish the memories of visiting Alaska cherish the very wild nature of the state. To denude the landscape in a manner that simply encourages the idea of a managed game reserve in contrary to the very idea of wild Alaska.

Thank you,
Sayre Family



Please **Oppose Proposals 35 and 36** and do not allow the airborne killing of **Wolves** in the two Game Management Units on the Kenai Peninsula.

I am hoping you will **Support Proposal 127** and stop the snaring and needless killing **Black Bears**.

Regulations need updating regarding the trapping of **Beavers** and I hope you will **Support Proposal 43**.

Please be good stewards of our magnificent wildlife and wildlands.

Sincerely,
Judy Skopek
1726 York View Circle
Vista, CA 92084



I oppose proposals 35 and 36

Just to keep this short, I OPPOSE THE KILLING OF WOLVES, especially aerial!

Please stay out of Nature, and let God make it right again.

Thank you,
Sandy Webb



Oppose 35 and 36

I will admit that I am opposed to hunting wolves for game sport. But I am especially grieved by the act of aerial sharp shooting, especially when research does NOT support a need for thinning the herds in these GMUs.

- The ADF&G's own research clearly shows that in GMU 15A habitat is what is limiting moose populations, and **even if wolves are killed the moose will still have far too little to eat.**
- In GMU 15C, moose population goals have been met and the **killing of wolves would constitute a blatant attempt at game farming.** The result would be significant negative impacts on the integrity of the ecosystems.
- Another issue in 15C is the well-documented sustained peak in the hare population. When the hare population is this high they constitute a major part of the wolves' diet. Therefore, **killing wolves would be counter-productive because hares feed on the same willows which are a staple food supply for moose.**

When we take the time to stop, really stop, and listen to our inner self, we know that acting with disregard for another life is both damaging to the environment and ourselves.

You can stop this ... please do so!

Kenya



ATTN: Board of Game Comments

I **oppose proposal 35 and 36.** These proposals provide authorization for the airborne killing of wolves in two Game Management Units on the Kenai Peninsula. They are simply an anti-science "gift" to the special interest commercial hunting organizations, and were requested by the BOG itself, not Alaska Department of Fish and Game biologists. A few relevant points for your comments follow:

The ADF&G's own research clearly shows that in GMU 15A habitat is what is limiting moose populations, and even if wolves are killed the moose will still have far too little to eat.

In GMU 15C, moose population goals have been met and the killing of wolves would constitute a blatant attempt at game farming. The result would be significant negative impacts on the integrity of the ecosystems.

Another issue in 15C is the well-documented sustained peak in the hare population. When the hare population is this high they constitute a major part of the wolves' diet. Therefore, killing wolves would be counter-productive because hares feed on the same willows which are a staple food supply for moose.

The Kenai Peninsula is a world-renowned, year-round recreation area for Alaskans and visitors alike, and supports several population centers. Indiscriminate aerial wolf hunting would be contradictory to the lifestyle and economy of this area.

I **support Proposal 43** asking the BOG to update regulations regarding trapping "nuisance" beavers to control property damage. Current regulations are outdated and fail to recognize the important role beaver habitat plays in healthy ecosystems for fish, birds and other wildlife. Specifically, current regulations fail to consider the installation of beaver pond flow devices as a method of preventing or alleviating property damage. (See the in-depth article in the Summer 2011 issue of Alaska Wildlife Echoes entitled "Beavers, People and Officialdom: the evolution of cooperation in Juneau" for more information about the Beaver Patrol's extensive work with beaver habitat.) This proposal was submitted by AWA-SE Board member and Beaver Patrol member Patricia O'Brien.

I **support Proposal 127** which would prohibit black bear snaring. The Alaska Center for the Environment submitted this well-researched proposal that we ask you to support for the following reasons:

Hundreds of bears have been killed over the past three years after being caught in a snare, including black bears, brown bears, sows and sows with cubs in this ADF&G "experiment".

This indiscriminate and cruel practice is spreading throughout the state, and if the BOG approves this, anyone will be able to apply for a permit to snare bears.

A recent scientific report shows independent scientists are concerned that Alaska is headed down the same path as every other state which once boasted healthy bear populations.

Stop the killing of these creatures.

Cindi Read



Dear BOG,

I oppose proposals 35 and 36. These proposals provide authorization for the airborne killing of wolves in two Game Management Units on the Kenai Peninsula. They are simply an anti-science "gift" to the special interest commercial hunting organizations, and were requested by the BOG itself, not Alaska Department of Fish and Game biologists.

- The ADF&G's own research clearly shows that in GMU 15A habitat is what is limiting moose populations, and **even if wolves are killed the moose will still have far too little to eat.**
- In GMU 15C, moose population goals have been met and the **killing of wolves would constitute a blatant attempt at game farming.** The result would be significant negative impacts on the integrity of the ecosystems.
- Another issue in 15C is the well-documented sustained peak in the hare population. When the hare population is this high they constitute a major part of the wolves' diet. Therefore, **killing wolves would be counter-productive because hares feed on the same willows which are a staple food supply for moose.**
- The Kenai Peninsula is a world-renowned, year-round recreation area for Alaskans and visitors alike, and supports several population centers. **Indiscriminate aerial wolf hunting would be contradictory to the lifestyle and economy of this area.**

Proposal 43 I support. You need to update regulations regarding trapping "nuisance" beavers to control property damage. **Current regulations are outdated and fail to recognize the important role beaver habitat plays in healthy ecosystems for fish, birds and other wildlife.** Specifically, current regulations fail to consider the installation of beaver pond flow devices as a method of preventing or alleviating property damage. This proposal was submitted by AWA-SE Board member and Beaver Patrol member Patricia O'Brien.

Proposal 127 I support. It would prohibit black bear snaring. The **Alaska Center for the Environment** submitted this well-researched proposal that we ask you to support for the following reasons:

- **Hundreds of bears have been killed over the past three years after being caught in a snare,** including black bears, brown bears, sows and **sows with cubs** in this ADF&G "experiment".
- This indiscriminate and cruel practice is spreading throughout the state, and **if the BOG approves this, anyone will be able to apply for a permit to snare bears.**
- A recent scientific report shows **independent scientists are concerned that Alaska is headed down the same path** as every other state once boasted healthy bear populations.

Janet Hoben
1724 Peyton Ave #G
Burbank, CA 91504-3646



I am writing to OPPOSE Proposals 35 and 36:

- The ADF&G's own research clearly shows that in GMU 15A habitat is what is limiting moose populations, and even if wolves are killed the moose will still have far too little to eat.
- In GMU 15C, moose population goals have been met and the killing of wolves would constitute a blatant attempt at game farming. The result would be significant negative impacts on the integrity of the ecosystems.
- Another issue in 15C is the well-documented sustained peak in the hare population. When the hare population is this high they constitute a major part of the wolves' diet. Therefore, killing wolves would be counter-productive because hares feed on the same willows which are a staple food supply for moose.
- The Kenai Peninsula is a world-renowned, year-round recreation area for Alaskans and visitors alike, and supports several population centers. Indiscriminate aerial wolf hunting would be contradictory to the lifestyle and economy of this area.

I am writing to SUPPORT:

Proposal 43 : Current regulations are outdated and fail to recognize the important role beaver habitat plays in healthy ecosystems for fish, birds and other wildlife. Specifically, current regulations fail to consider the installation of beaver pond flow devices as a method of preventing or alleviating property damage. This proposal was submitted by AWA-SE Board member and Beaver Patrol member Patricia O'Brien.

Proposal 127: Prohibit black bear snaring.

- Hundreds of bears have been killed over the past three years after being caught in a snare, including black bears, brown bears, sows and sows with cubs in this ADF&G "experiment".
- This indiscriminate and cruel practice is spreading throughout the state, and if the BOG approves this, *anyone* will be able to apply for a permit to snare bears.
- A recent scientific report shows independent scientists are concerned that Alaska is headed down the same path as every other state which once boasted healthy bear populations.

Patricia Schneider



Opposition 35, 36

Why do we need to control every aspect of this planet.

What arrogance controls your thinking that clouds the fact that this planet controls itself.

We are a part of this planet. We do not own it.

Stop the aerial murder of my brother the wolf.

Allen Acosta



I oppose proposals 35 and 36

Please do not shoot the wolves. I may live in the Southwest but knowing that the Kenai wolves can roam freely without fear of prosecution is important to me.

The ADF&G's own research clearly shows that in GMU 15A habitat is what is limiting moose populations, and **even if wolves are killed the moose will still have far too little to eat.**

In GMU 15C, moose population goals have been met and the **killing of wolves would constitute a blatant attempt at game farming.** The result would be significant negative impacts on the integrity of the ecosystems.

Another issue in 15C is the well-documented sustained peak in the hare population. When the hare population is this high they constitute a major part of the wolves' diet. Therefore, **killing wolves would be counter-productive because hares feed on the same willows which are a staple food supply for moose.**

The Kenai Peninsula is a world-renowned, year-round recreation area for Alaskans and visitors alike, and supports several population centers. **Indiscriminate aerial wolf hunting would be contradictory to the lifestyle and economy of this area.**

Sincerely,

Carol Norton
369 Montezuma Ave #159
Santa Fe, NM 87501



OPPOSE 36,36

To whom it may concern:

I am a Native American in the State of Michigan.

I am totally against Killing Wolves all together!

Please stop killing these wolves, because Karma will come back on you!

It's pretty sad when people have to kill one of God's creatures when they don't do anything to hurt humans, they aren't hunting humans!

But maybe they should start, they need people to protect them!

I'm not a Wacked out type of person, but again as I said, I AM Native American and the Wolves are my brothers and sisters.

You hunt them you hunt me!

So please, come and find me because I'd like to give you some of your own medicine!

I'd like to strap you to the wing of my airplane and fly over the world and display you as my prize.

If people are killing animals for sport, it should be against the law, and it is against the Nature of God!

The only time anyone should be killing animals, mammals, or fish is for food only!

Thank you!

Ron Perry (Anger Wolf)

That is my Given Indian Name!



To Whom it May Concern:

I am appalled that your state is moving forward with plans for the aerial slaughter of wolves. I hope that you will consider **rejecting Proposals 35 and 36** and finding a less barbaric way to manage the wolf population, such as animal birth control.

Thank you for your time and consideration.

Lisa Williamson
2742 N. Fair Oaks Ave.
Tucson, AZ 85712

--

"Until one has loved an animal, part of their soul remains unawakened."
~ Anatole France

"You can tell the heart of a man by his treatment of animals."
~ Immanuel Kant



To whom it concerns,

I oppose #35 #36

I have taken this time to write to you on the behalf of those whom cannot speak. Those who live in the harsh yearly outdoor conditions of the environment. Those who have to hunt with what God has given them to survive; their bare mouths. Those same beings that don't know when they will eat next or if they can provide for their offspring.

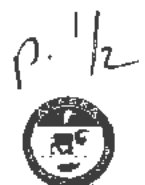
Now these same entities have yet another large storm to weather: mass killing by aerial hunters. I speak for those wolves who cannot speak. My voice comes from afar. These creatures are being persecuted from all sides and angles. Due to our advancements in the evolution chain, we must be stewards for those less fortunate. It is our duty to protect our wild heritage, wolves, animals, forests, ecosystems... IF we do not, no one will.

I take pleasure in travel and I have seen many things on my way to and from places. A healthy ecosystem is a wonderful place but unfortunately is not found in many places. Kenai is a special place to Alaska. It is one of the last places in the US where humans can experience a minimally hindered ecosystem. A wonderful place full of experiences that one can find little anywhere else. Please do not destroy this delicate balance. Wolves are a natural and needed predator for a genuine, true, and pristine ecosystem. Aerial gunning and trapping of these wolves will not solve human caused problems on this peninsula. We create these areas and parks to keep sacred the animals that are persecuted all over.

In addition to, a rapid decline in the wolf population would artificially spike the hare population causing a detrimental drop in willow food thus, hurting the moose population which perhaps can be more devastating than the wolf population as of current and future.

I live in a place where there is little population of predators. Varmints and ungulates are artificially high. Hunters love this aspect however, the ecosystems, farms, gardens, grazing lands, and vehicles suffer because of it. It is a sad place when the ecosystem has become a large farming industry for the select special interests groups. Deer become cow and cow become deer. It is a sad and bleak outlook. Please do not let the state of Alaska become this!

How often is it that a person or family needs to hunt and needs to kill to eat and survive? It is 2011, almost 2012, this requirement is nearly non existent in the US. I do not condemn hunting. In fact, I myself, am a hunter. Fresh meat is always nice but we do not need it. As a hunter I understand the need for a healthy ecosystem and are willing to sacrifice for it as any true genuine and appreciating hunter should. I think it is time that hunters do their part and understand. We must share and not be greedy. Too many of times has hunting been about the biggest rack and hide rather than the meat. Yet, hunting does not need to completely or remotely stop. In the 15C zone, moose population goals have been met and therefore do not stop hunting in the area. Those who need and can use the food still can take their kill while sharing with the native wildlife.



Many people from around the world visit Alaska to experience the fruits the state has to offer: wildlife, landscape, and culture. I speak on the behalf of others and of myself as well. Please do not strip the native wildlife of their rights to live and our pleasures and dreams of seeing them thrive and survive....unhindered by the human beings that occupy around 75% of habitable land.

My intentions of visiting Alaska is a majority of the chance to experience wolves in natural habitat where humans have less of an impact. It is amazing to experience wildlife and their interactions first hand. Please do not take this away from the people! Keep Alaska wild and do not make decisions that lack Science backing. Instead, please use resources to increase all wildlife populations to healthy and sustainable levels without the use of artificial killing. We have traveled to the moon, created the internet, and have invented the stealth fighter...we surely can live with wildlife through other means than their destruction.

I support #127

I also now extended this letter to ask for the elimination of cruel snare traps. Again, it is 2011 and not 68 BC. We have learned from the past. Moral beings do not enjoy suffering on any level. Please ban this inhumane and barbaric form of hunting for the protection of wildlife, people, and pets alike!

Thank you for your time,

Sarah Jay

P. 2/2



To Whom it Concern:

I'd like to state that I am opposed to the proposed barbaric murder of wolves in any manner, and particularly aerial gunning, in a so-called attempt to manage the population to appease groups of people. Failure to completely explore all other avenues, and apply other known measures, which would be beneficial to both humans and the wolf population is inexcusable. It shows a lack of humanity in a state that is known for pristine beauty. To murder these magnificent creatures who already face endangerment from humans encroaching on their territory is simply unforgivable.

There is no reason that Alaskan government should cater to the few groups when the majority of Alaskans have already voice their concerns about this barbaric method.

I ask that you listen to the majority, rather than those who are ignorant and uninformed in proper and successful wolf management.

Raytha Poland



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

From: Heidi Dorr, Christopher White & Hannah Dorr-White
8 Hubbard Park Drive / Montpelier, VT 05602

RE: Aerial Killing of Kenai Wolves

We are strongly **opposed to the killing of wolves as proposed in proposals 35 and 36.**
Please do not pass these proposals which will be detrimental to the ecosystems of the area
and inhumane to the wolves.

We are in favor of your **support on Proposal 43 and Proposal 127.**

Re: Proposal 43: Current regulations are outdated and fail to recognize the important role beaver habitat plays in healthy ecosystems for fish, birds and other wildlife.

Re: Proposal 127: black bear snaring should be prohibited as it is a cruel and detrimental practice that endangers the bear population.

Thank you ~ Heidi, Christopher & Hannah



I oppose 35 36

Wolves are part of the natural ecology of our planet.
They deserve the right to live in the wild.
Please stop the practice of killing wolves from the air.

Thank you,
Andrea Wasserman



This letter is to register my **opposition to Proposals 35 and 36**. I have vowed to never visit Alaska due to your predator control tactics and specifically your continuous slaughter of wolves. It is just amazing how prolonged this predator control program has continued in the state of Alaska. Your determination to kill these magnificent animals is an indication of your lack of spiritual depth. I feel sorry for you.

Gary Voeste
272 Hobbs St
Moab, UT 84532



In opposition to 35 and 36

Please do not authorize aerial wolf hunting. This is a very bad idea. The Wolf is an ancestor of man's best friend--the dog. However, it is wilder and smarter. They are our brothers. We should protect the wolves and the environment in general. Aerial hunting is just wrong. I'm not against hunting in and of itself, but this is just wholesale murder--they won't even have a chance. Haven't we learned anything in the past 1000 years?

Sharon Abramczyk
Farmington, Connecticut



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

Across the world too many already fragile eco-systems are under threat from so-called 'game management programs', many of which often hinder, rather than help, maintain a healthy and natural balance of wilderness and wildlife. We stand with those who oppose the aerial killing of Kenai wolves. **Act now to strongly Oppose Proposals 35 and 36.** Leave it alone, leave them alive. The integrity of habitats depends on a natural balance, as do we all. Carefully consider your choices; it's time to change your thinking about an unlimited font of the natural wild. It just isn't so. Add your own voices to protecting, preserving, and presenting a new way of allowing what little wild is left in the world - to thrive.

In addition the positive **support of Proposals 43 and 127** will help move your management plans in a better direction.

"We need another and a wiser and perhaps a more mystical concept of animals. In a world older and more complete than ours they move finished and complete, gifted with extensions of the senses we have lost or never attained, living by voices we shall never hear. They are not brethren, they are not underlings; they are other nations, caught with ourselves in the net of life and time, fellow prisoners of the splendour and travail of the earth."

— Henry Beston

With Best Regards,

Katherine Krause



I OPPOSE BOG Proposals 35 and 36.

I SUPPORT BOG Proposals 43 and 127.

Terry Horner



I oppose proposals 35 and 36

You need to support wildlife, not destroy it.

Patricia Tallman



OPPOSE 35 36

Dear Board of Game member,

Please vote no on proposals 35 and 36, regarding authorization for the airborne killing of wolves in two Game Management Units on the Kenai Peninsula. As I've stated in the past, I'm concerned that the actions considered do not take into account the biology regarding habitat and populations of the wolves, moose, and hare that live within the region. Eliminating wolves from the area would not necessarily lead to a greater number of moose because without the wolves controlling the hare population, moose would be competing for food with the hares.

Please look at the Fish and Game staff recommendations and consider what is in the best interest for best game management practices.

Sincerely,
Corinne Conlon



Support proposal #127

Dear Sirs:

We strongly support the proposal prohibiting the snaring of black bears and any other animals. When the practice started we couldn't believe that it was acceptable in Alaska. It is a cruel, unnecessary, and barbaric way to treat any animal, especially black bears. Proposal 127 is a widely researched proposal that would stop the killing of one of the animals most visitors come to your state to see. This inhumane disgusting method of killing is not done just to the males, but also to the sows and cubs. It is a horrifying way to kill anything! Humans should be above such despicable behavior. Please do not encourage this practice and consider the negative effects it will have on bears throughout the state and on tourism.

When we retired we always thought we'd come to Alaska for 4 weeks and return on a regular basis. We will not do that until your state proves they will protect their wildlife and when necessary control them in a humane manner. We tell everyone we know about the snaring of bears and they are horrified. We are suggesting to friends that they do not visit Alaska for a vacation until snaring and other unacceptable practices cease. You can do a lot to make sure this practice does not spread through the state. Independent scientists are afraid Alaska is headed the same way other states were as their bear populations dwindled or ceased to exist.

Man should be a protector not a destroyer. Please stop snaring and allow the magnificent wildlife that abounds in Alaska to thrive humanely and successfully.

Diane and Chuck Brandstetter

5670 Carvel Ave.

Indianapolis, Indiana 46220



Dear Sirs:

We **support Proposal 43** to update and make correct the regulations regarding trapping of "nuisance" beavers to control property damage. We even saw on TV here in Indianapolis a very positive TV special about the State of Alaska and volunteers in Juneau complimenting their efforts in increasing the good effect beavers have on the environment. That program documented the volunteers that go around to fix any possible beaver damage near Juneau and about how the installation of beaver pond flow devices can prevent and stop property damage. This entire community effort helps the Alaskan environment, the beavers, and wildlife in general. The beavers are an important part of the healthy ecosystems of birds, fish and other wildlife and provide a positive effect on the environment. You can be a front runner in beaver and land conservation in Alaska by approving Proposal 43.

Diane and Chuck Brandstetter

5670 Carvel Ave

Indianapolis, Indiana 46220



To Whom It May Concern:

My name is Heather Whitney, and I am a resident of Homer, Alaska, and have been an Alaskan resident since 1993. I've lived on the Kenai Peninsula since 1998. I am writing with regard to three wildlife issues under consideration: aerial wolf killing, beaver trapping, and bear snaring.

1) Aerial wolf killing:

I **oppose Board of Game's proposals 35 and 36**, which would authorize wolf kills by the BOG on the Kenai Peninsula, by plane or helicopter. I oppose wolf kills--of any type--that are not based on sound biological recommendations by wildlife biologists, and these proposals are not supported by noted wildlife biologists in Alaska. Moose populations in Unit 15A are not threatened by wolves, they are in areas that are not sustainable due to a lack of food. Wolves and moose do not compete for the same food, so it is a curious solution on the part of the BOG to kill wolves in this area. It has been shown that rabbits and moose compete for the same food, willow saplings and leaves, and wolves help keep rabbit populations in check. Rabbits proliferate on the Kenai Peninsula, and in the areas under consideration by the BOG, so it makes no logical sense to kill wolves to save moose populations.

The number of subsistence moose hunters--i.e., Alaskan residents--does not warrant the killing of wolves to protect moose for hunting purposes. What is obviously happening is that big-game hunting guides in and out of Alaska, and moose hunters from out of state, are directing the unsound biological practices of the BOG. This is disappointing at best, and should stop. Balanced ecosystems, most notably on the Kenai Peninsula, may not be important to special interests like moose hunting guides and out of state hunters, but they are important to the residents of our beautiful peninsula, including me. Unhealthy ecosystems are detrimental to wildlife and human health.

I ask that Proposals 35 and 36 be opposed and stricken from any future consideration.

2) "Problem" beaver killing:

I **support Proposal 43**, which asks that the BOG updates current regulations in dealing with beaver dams/systems that threaten private property values. There currently is a very easy and safe solution to this problem, which is a beaver pond flow device that would divert flows from beaver dams, saving properties close to dams. Killing beavers and by extension the ecosystems that they support for other wildlife, is an antiquated regulation that is unnecessary.

I ask that the BOG incorporate the suggestions in Proposal 43, and update their current policy to reflect changing times and ecological protection.

3) Bear snaring:

I **support Proposal 127** that would stop the snaring of bears, by anyone. Snaring is a cruel practice that causes long, drawn out agony for the animal. It is considered a "cheater" way to hunt an animal, and should have no place in Alaska wildlife management. I ask that the BOG stop the experiment of snaring bears and incorporate the suggestions in Proposal 127 to the policy.

Thank you for your time, and for reading my comments.

Heather Whitney Homer, Alaska



Please **support proposal 43** and update regulations regarding trapping nuisance beavers. **Current regulations are outdated and fail to recognize the important role beaver habitat plays in healthy ecosystems for fish, birds and other wildlife.** Specifically, current regulations fail to consider the installation of beaver pond flow devices as a method of preventing or alleviating property damage.

Please **support proposal 127**, regarding the snaring of black bears. The Alaska Center for the Environment submitted this well-researched proposal that we ask you to support for the following reasons:

- **Hundreds of bears have been killed over the past three years after being caught in a snare**, including black bears, brown bears, sows and **sows with cubs** in this ADF&G "experiment".
- This indiscriminate and cruel practice is spreading throughout the state, and **if the BOG approves this, anyone will be able to apply for a permit to snare bears.**
- A recent scientific report shows **independent scientists are concerned that Alaska is headed down the same path** as every other state which once boasted healthy bear populations.

Kirsten Bilderaya



I Oppose proposals 35 and 36

The ADF&G's own research clearly shows that in GMU 15A habitat is what is limiting moose populations, and **even if wolves are killed the moose will still have far too little to eat.**

In GMU 15C, moose population goals have been met and the **killing of wolves would constitute a blatant attempt at game farming.** The result would be significant negative impacts on the integrity of the ecosystems.

Another issue in 15C is the well-documented sustained peak in the hare population. When the hare population is this high they constitute a major part of the wolves' diet. Therefore, **killing wolves would be counter-productive because hares feed on the same willows which are a staple food supply for moose.**

The Kenai Peninsula is a world-renowned, year-round recreation area for Alaskans and visitors alike, and supports several population centers. **Indiscriminate aerial wolf hunting would be contradictory to the lifestyle and economy.**

Kirsten Bilderaya



I Oppose proposals 35 and 36

The ADF&G's own research clearly shows that in GMU 15A habitat is what is limiting moose populations, and **even if wolves are killed the moose will still have far too little to eat.**

In GMU 15C, moose population goals have been met and the **killing of wolves would constitute a blatant attempt at game farming.** The result would be significant negative impacts on the integrity of the ecosystems.

Another issue in 15C is the well-documented sustained peak in the hare population. When the hare population is this high they constitute a major part of the wolves' diet. Therefore, **killing wolves would be counter-productive because hares feed on the same willows which are a staple food supply for moose.**

The Kenai Peninsula is a world-renowned, year-round recreation area for Alaskans and visitors alike, and supports several population centers. **Indiscriminate aerial wolf hunting would be contradictory to the lifestyle and economy.**

Kirsten Bilderaya



Dear Alaska Board of Game,

I am writing to express my sincere and heartfelt opposition to the proposed aerial shooting of Alaska's wolves (aka "aerial wolf control"). The story about Romeo is such a sad story and a tragedy, and I implore you to do what you can to avoid further incidents such as that one. As humans, we need to be guardians, caretakers and custodian of this planet and its inhabitants. In the eloquent words of some Native Americans: "We do not inherit the Earth from our Ancestors, we borrow it from our Children."

Please do the right thing for our shared part and reputation in human history and stop all cruel, arrogant and self-important treatment of fellow inhabitants.

Please vote down the plans to destroy Alaska's beautiful wolves. The Alaska Wildlife Alliance presents a more than compelling and rational set of arguments against killing these beautiful animals:

- The ADF&G's own research clearly shows that in GMU 15A habitat is what is limiting moose populations, and even if wolves are killed the moose will still have far too little to eat.
- In GMU 15C, moose population goals have been met and the killing of wolves would constitute a blatant attempt at game farming. The result would be significant negative impacts on the integrity of the ecosystems.
- Another issue in 15C is the well-documented sustained peak in the hare population. When the hare population is this high they constitute a major part of the wolves' diet. Therefore, killing wolves would be counter-productive because hares feed on the same willows which are a staple food supply for moose.
- The Kenai Peninsula is a world-renowned, year-round recreation area for Alaskans and visitors alike, and supports several population centers. Indiscriminate aerial wolf hunting would be contradictory to the lifestyle and economy of this area.

Thank you in advance for doing the right thing.

Sincerely,

William Weir
55 E Clinton Ave.
Tenafly, NJ 07670



OPPOSE PROPOSALS 35 AND 36

PLEASE! Please don't allow this practice. This is a vile and barbaric treatment of an animal that has no defense against a GUN.....Or a Bow, but Aerial hunting is most heinous.

Here is a Quote from the late Dr. (PhD) Gordon Haber...."Unfortunately there are major problems for wolves in Alaska and elsewhere from heavy government-sanctioned killing, including with the use of airplanes and snowmobiles. There have even been Mengele-like experiments to convert their vibrant family groups (so-called packs) to sterile pairs across large regions. The vital underlying patterns of variation that define natural wolf-prey systems are being ignored and replaced. This is being done with parochial, anti-adaptive farming approaches to management that seldom if ever produce and sustain the high, stable numbers and yields of moose and caribou touted by proponents. Perhaps worst of all, these problems originate primarily from biologists and remain largely hidden from public notice due to outright deception."

Sincerely

Kate Massey
Texas



I am writing to voice my **support for these two proposals: 43 and 127**

Please **support Proposal 43** to update regulations regarding trapping "nuisance" beavers to control property damage. Current regulations are outdated and fail to recognize the important role beaver habitat plays in healthy ecosystems for fish, birds and other wildlife. Specifically, current regulations fail to consider the installation of beaver pond flow devices as a method of preventing or alleviating property damage.

Please **support Proposal 127** which would prohibit black bear snaring.

Hundreds of bears have been killed over the past three years after being caught in a snare, including black bears, brown bears, sows and sows with cubs in this ADF&G "experiment".

This indiscriminate and cruel practice is spreading throughout the state, and if the BOG approves this, anyone will be able to apply for a permit to snare bears.

A recent scientific report shows independent scientists are concerned that Alaska is headed down the same path as every other state which once boasted healthy bear populations.

You must protect our wildlife and environment! It is slowly disappearing and we must reverse that trend!!

Thank you.

Jo-Ann Murphy
5251-C Highway 153
PMB 179
Hixson, TN 37343



I wish to advise you of my **vehement opposition to Proposals 35 and 36!**

These proposals provide authorization for the airborne killing of wolves in two Game Management Units on the Kenai Peninsula. They are only for the benefit of special interest commercial hunting organizations, and requested by the BOG itself, not Alaska Department of Fish and Gamebiologists. This is a great disservice to our environment!

The ADF&G's own research clearly shows that in GMU 15A habitat is what is limiting moose populations, and even if wolves are killed the moose will still have far too little to eat.

In GMU 15C, moose population goals have been met and the killing of wolves would constitute a blatant attempt at game farming. The result would be significant negative impacts on the integrity of the ecosystems.

Another issue in 15C is the well-documented sustained peak in the hare population. When the hare population is this high they constitute a major part of the wolves' diet. Therefore, killing wolves would be counter-productive because hares feed on the same willows which are a staple food supply for moose.

The Kenai Peninsula is a world-renowned, year-round recreation area for Alaskans and visitors alike, and supports several population centers. Indiscriminate aerial wolf hunting would be contradictory to the lifestyle and economy of this area.

Please carefully consider thee issues and vote to protect our environment and wildlife.

Thank you.

Jo-Ann Murphy
521-C Highway 153
PMB 179
Hixson, TN 37343



To whom it may concern,

I oppose proposals 35 and 36.

I am opposing the aerial killing of the wolves. What right do we have to kill animals that were created by the Almighty God. It is inhumane to torture any wild animal. Wolves are on this planet for a reason and they are essential to the North American system. What grounds does the Board have to kill these animals???? None whatsoever, except for invading Nature.

THEREFORE STOP AERIAL KILLING OF ANY WOLVES!!!!

Sincerely,
Fernanda Klinger



To the Board of Game,

Without the wolf the ecosystem fails. Wolves control the game population without them the game population gets out of control, food sources soon disappear due to the game not being move to other locations in the forest and then we eventually lose the forest. Do not allow aerial hunting on wolves, it is barbaric and unnecessary.

Nikki Yrenio



Dear Alaska Board Of Game Officials,

I am not a resident of Alaska, and have never even visited. I am writing this email to you in **Support of Proposals 43 and 127**, but in **Opposition to Proposals 35 and 36** because I am a concerned denizen of our planet Earth and all of its inhabitants who are defenseless and unable to communicate to their human controllers.

I will leave all of the valid, scientific reasons for the support and opposition of the above proposals to others who are more knowledgeable in the specifics of the wildlife biology applicable to each Proposal. But I believe that my comments are just as valid, and perhaps will lead at least one Board Member to become a full human being.

The wolves of Kenai Peninsula are a threat to no one except for the sick, pathological hunters who lust in killing. The greatest threat to both the moose and the wolves is Human Intervention. Starvation and Death are as common in Nature as Feasting and Life. We must let Nature, and only Nature decide who will survive, and who will die, as has been the case for millions of years before humankind made his indelible mark on Earth. Let them live, and let them die, but Leave Them Alone.

Thank you for your attention

Sincerely,
Jeffrey Kramer
(For The Spirit Of Romeo)



To Whom it May Concern,

I strongly **oppose Proposals 35 and 36** which would provide authorization for the airborne killing of wolves on the Kenai Peninsula. Killing of these wolves was not requested by Alaska Department of Fish and Game biologists but rather by the Board of Game. This clearly proves that these killings would not be based on science and are only to please hunters and special interest groups

The article written by retired state biologist Rick Sinnott (in addition to doing my own research) gives solid evidence that wolves have very little to do with declining moose populations. Lack of food, change in habitat and overhunting are the main reasons. It is time that you view wolves as a critical part of a healthy ecosystem. I think man has done enough damage with these so called "wildlife management policies". God created all of these creatures for a reason and I don't think man has done this world a service by interfering and throwing off the balance of nature.

I would also like to express my **strong support for Proposal 43**. Beavers are also vital to a healthy ecosystem and should not be indiscriminately trapped. My community in NJ uses beaver pond flow devices and they work extremely well. Please update your regulations to include this devices to control property damage.

I also **support Proposal 127**. Trapping and snaring is cruel and inhumane and has no place in our civilized world. Not only are you indiscriminately killing many other types of wildlife, you are putting your states black bear population in peril.

Aerial killing of wolves is cruel and unwarranted. I sent my comments to you in November and still remain strongly opposed. Many more people across the country are aware on the misguided policies made in the name of wolf management. We will all be watching and hoping that Alaska does the right thing.

Sincerely,

Loretta Stadler
Franklin Lakes, NJ



Dr. Michael H.W. Huesemann

Dr. Joyce A. Huesemann

POB 998

Carlsborg, WA 98324

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

December 26, 2011

Dear Sirs:

The following are comments on Proposals 35 and 36 which we **VERY STRONGLY OPPOSE**. The killing of wolves on the Kenai Peninsula is totally unacceptable. We are fed up with the continuing corruption of the management process by special interests and the BOG members who are bought and paid for by those interests.

It looks very much (in #35 and #36) like the BOG is proposing to run the state like a game farm and is playing politics (and undoubtedly taking bribes) to do it. Let's be honest for a change – it is not lobbying, it is bribing. And it is corruption.

The Alaska Dept. of Fish and Game scientists have not proposed this, but the usual sleeze who have no shame or scruples. It has been clearly shown that the moose are limited by habitat issues, not wolves. Removing wolves will do nothing except unbalance the habitat to a greater degree. Defeat #35 & #36.

The following are comments on Proposals 43 and 127 which we strongly **SUPPORT**:

Proposal 43 would update regulations regarding beaver and would end crude and outdated methods for dealing with problems. Proposal 127 would prohibit bear snaring, an indiscriminant practice which has gotten completely out of control. It is time to get rid of your 18th century white trash policies and get up to date and preserve the wildlife heritage you still have left. Approve #43 & #127.

Dr. Michael Huesemann

Dr. Joyce Huesemann



I oppose 35 and 36

I personally am totally offended that this topic is even occurring ! How could someone get in an airplane and run these beautiful majestic animals so that they are exhausted then shoot them ? This is **OBSURD** and **DISGUSTING** . These are the most beautiful , so majestic creatures on this planet. This proposition is apparently just so people can murder innocent animals . Have any of you been up close to a wild wolf ? Have you seen how they protect one another? You shoot a mother wolf the pups end up dying . They will suffer because their mother is dead. **THIS HAS TO STOP !!!!!** please don't let this happen. It breaks my heart .

I sponsor a wolf at the Lakota Wolf Preserve in New Jersey . His name is River. Last summer we camped out that way . We walked up the mountain and sat outside the enclosures . I called out to River. The owners happened to be up there at the time. River came running down to the fence. To see him , to hear him howl. Then the rest of them joined in howling . Singing their beautiful music. It warms the heart. My 6 year old sponsors Blackstar he is a majestic wolf as well. Evan sits down on the bench and he is so happy to see "his " wolf.. tears come to his eyes. I teach my son to respect all animals.. all wildlife..

Evan has a special gift when it comes to animals. At home the deer will come right into the yard when we are outside. The squirrels come right up to him. Even the birds will land on his playscape while he is playing on it and are not even scared of him . He can hand feed all of these creatures. They do not run away from him. He heard about the wolf hunts on tv. He was mortified. How do I explain to a 6 year old why our government wants to kill , murder and mame such beautiful animals?

Sincerely
Lisa Kerry
22 Rocket Run
Enfield,CT 06082



Oppose 35 and 36

I wanted to email in my comments regarding the measures that would pass aerial gunning control of wolf populations. I think these measures should not pass and that they are also unacceptably cruel. It is wrong to kill animals this way and these measures will not solve the problems that are supposedly what these measures are trying to solve in the first place. The wolf was hunted to extinction in the U.S. in the last century, and through a great deal of conservation and concern for the species, reached a maintainable population. This could challenge the efforts of decades to preserve this beautiful animal in the wild. To slaughter wolves from helicopters when they could have pups in small burrows waiting for mothers to return, and who will then freeze and/or starve to death is inhumane and wrong, and I do not want this measure passing.

Sincerely,
Shaymaa Mahmoud



To Whom it May Concern:

I am writing to express my dismay at the continued practice of Aerial Wolf hunting in Alaska.

This Barbaric practice which has been going on for years in your State, has just sickened me and is the sole reason I will never visit or contribute economically in anyway to Alaska. How can a human with any kind of a heart, feel that this practice is an o.k thing to do? In this age as we search for Humanity, how can anyone approve of flying over a defenseless animal who has nowhere to hide, and after shooting it, often leaving it to die an agonizing, painful death. it it is not immediately killed. I cannot wrap my head around the fact that this type of horrible killing is being done in this Country.

Although I do not condone hunting, at least in "on the ground" hunting, the animal has a CHANCE of escape or a place to hide. Shooting from the air is nothing a civilized person of any kind should even consider!

My family and I have wanted to visit Alaska for many years, and I look forward to the day when I read that this State has FINALLY ceased the horrible aerial hunting of the majestic Wolf, so that we may finally get a chance to see this State first hand.

Julie Billingsley
Lafayette, Colorado



It is so sad that that the wildlife in Alaska is being killed!! The wolves, bear & other wildlife do not deserve to be caught in snare traps. They are very beautiful & deserve to live out their lives!! Animals are becoming extinct & why is that?? Because man is killing them.

Personally I think it would be so funny to see a wolf or a bear running around setting traps for man or carrying guns to shoot them!! PLEASE can't we just save GOD'S creatures & enjoy their beauty?? It is only fair to give them a chance at life, like you deserve a chance to live!! GOD put them here for a reason!!

THANK YOU,
PATTY FRYMAN

PLEASE CAN'T WE SAVE GOD'S CREATURES???



I am writing to express my strong **opposition** to proposals 35 and 36, that provide authorization for the airborne killing of wolves in two Game Management Units on the Kenai Peninsula. They are simply an anti-science "gift" to the special interest commercial hunting organizations, and were requested by the BOG itself, not Alaska Department of Fish and Game biologists. Please consider:

- The ADF&G's own research clearly shows that in GMU 15A habitat is what is limiting moose populations, and **even if wolves are killed the moose will still have far too little to eat.**
- In GMU 15C, moose population goals have been met and the **killing of wolves would constitute a blatant attempt at game farming.** The result would be significant negative impacts on the integrity of the ecosystems.
- Another issue in 15C is the well-documented sustained peak in the hare population. When the hare population is this high they constitute a major part of the wolves' diet. Therefore, **killing wolves would be counter-productive because hares feed on the same willows which are a staple food supply for moose.**
- The Kenai Peninsula is a world-renowned, year-round recreation area for Alaskans and visitors alike, and supports several population centers. **Indiscriminate aerial wolf hunting would be contradictory to the lifestyle and economy of this area.**

I am also writing to express my **support** of the following proposals:

Proposal 43 which asks the BOG to update regulations regarding trapping "nuisance" beavers to control property damage. **Current regulations are outdated and fail to recognize the important role beaver habitat plays in healthy ecosystems for fish, birds and other wildlife.** Specifically, current regulations fail to consider the installation of beaver pond flow devices as a method of preventing or alleviating property damage.

Proposal 127 would prohibit black bear snaring. The Alaska Center for the Environment submitted this well-researched proposal that we ask you to support for the following reasons:

- **Hundreds of bears have been killed over the past three years after being caught in a snare, including black bears, brown bears, sows and sows with cubs in this ADF&G "experiment".**
- This indiscriminate and cruel practice is spreading throughout the state, and **if the BOG approves this, anyone will be able to apply for a permit to snare bears.**
- A recent scientific report shows **independent scientists are concerned that Alaska is headed down the same path** as every other state which once boasted healthy bear populations.

Sincerely,
Lee Ann Stiff



To whom it may concern,

I oppose proposals 35 and 36 currently before the Board of Game. As a general aviation pilot and a conservationist living in the protected wilderness areas of the Adirondack Park of upstate New York, I am familiar with the tensions between wildlife and human communities. The answer to perceptions of wolves as indiscriminate killers is not to kill them from aircraft. This is simply barbaric in terms of the brutality of the method, and frankly a really disrespectful use of flight.

Killing wolves in this manner also will not alleviate your moose population concerns. Only changes in habitat management (in terms of human use) will make that change.

I also **support proposals 43 and 127** to end indiscriminate killing of black bears and beavers. Again, allowing these practices to continue is ineffective and brutal.

Thank you,

Kelley Tucker
Upper Jay NY



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

Greetings,

As a US citizen, an ecologist and an appreciator of all wild ecosystems and species I am asking you to **oppose proposals 35 and 36**. Vast amounts of science now demonstrate that apex carnivores are critical to healthy ecosystems, taxpayer investments and the very future of many of our wild species.

I implore you to oppose all culling of wolves, bears and other apex carnivores.

Thanks you for you attention to this critical matter.

Sincerely,

Spencer Lennard

POB 489
Williams Oregon 97544



Dear Board of Game members,

I have read extensively on this issue and vehemently **OPPOSE Prop. 35 and 36**. The following key points are what I feel need to be looked at:

1. The ADF & G's OWN research clearly shows that in GMU 15A the habitat is what is limiting moose populations. Even if wolves are killed the moose STILL would not have enough to eat to sustain them.

This is an excerpt from some of the recent research I have done:

According to a review paper titled Trophic Downgrading of Planet Earth, published last week in the journal *Science*, killing top predators is humankind's most pervasive influence on nature that has far reaching and devastating effects:

The study was conducted by a team of 24 scientists from around the world who compiled evidence from both experiments and observations to draw conclusions about the decline of top predators and herbivores on land, in the ocean and in freshwater.

"Their findings suggest that 'trophic downgrading' — the ecological consequences of losing large apex consumers from nature — causes extensive cascading effects in ecosystems worldwide, especially when exacerbated by factors such as land use practices, climate changes, habitat loss, and pollution," according to a statement from the Institute for Ocean Conservation Science, which provided major funding for the study, along with Pew Charitable Trust.

Some of the additional consequences noted were changes in vegetation, water quality, the frequency of wildfires, invasive species and the spread of infectious diseases. The review cited examples from the vegetation recovery after wolves were reintroduced at Yellowstone to the increase in intestinal parasites spread from baboons to each other and humans as a result of the loss of lions and leopards in Africa.

"By looking at ecosystems primarily from the bottom up, scientists and resource managers have been focusing on only half of a very complex equation," said lead author Dr. James A. Estes, professor of ecology and evolution at the University of California at Santa Cruz. "These findings demonstrate that top consumers in the food web are enormous influencers of the structure, function, and biodiversity of most natural ecosystems."

The report also notes that we are experience the sixth mass extinction in history, but it's the first to be caused by humans and despite the number of studies that can be conducted while animals are still alive, no one actually knows what the effect will be until they disappear.

2. Also, the well documented sustained peak in hare population in 15C is another issue. When this population is high they provide a major part of the wolves' diet. SO, killing wolves would be counter productive because hares feed on the same willows which the moose rely on for a stable food source.

3. The moose population goals have been met in GMU 15C and so killing wolves would be pretty much if not the same thing as GAME FARMING, not to mention the significant effects and impacts it would have on integrity of the ecosystems

p. 1/2



4. People come to Alaska TO SEE WOLVES just like they do in Yellowstone Nat. Park. The Kenai Peninsula is one of the major areas visitors, tourists and US ALASKANS go to recreate and actually want to see wolves. This would have a very negative impact on this areas economy.

- I am also asking you to **SUPPORT Prop. 43**. Current regulations are very outdated and do not recognize, once again, the important role animals, in this case, beavers, have in maintaining healthy ecosystems even though it might be a nuisance to us humans!

- I also ask you to **SUPPORT Prop. 127** regarding black bear snaring. It is an *embarrassment* that we allow such an unsportsmanlike method of hunting in this state, of all states.

It seems to me this Board only listens to the facts and science when it supports your and big game hunting personal agendas.

We will be known forever by the tracks we leave

Sincerely,

Leslie and Rowan Law

P. 2/2



To: Alaska Board of Game
Reference: Oppose Proposals 35 & 36

Proposals 35 and 36 clearly defy ADF&G's own research that shows evidence that GMU 15A habitat is the primary factor in decreasing moose population size and the removal of wolves will not affect the availability of food resources nor recruitment rates for moose populations.

Eliminating wolf populations in GMU 15C under the guise of efforts to restore moose populations is simply an avenue to game farming since moose population size goals have already been met. The negative effects of removing a top predator in these systems is scientifically well documented and exacerbates degradation of stable ecological systems.

As a wildlife biologist I believe that decisions must be made based on credible analyzed scientific data to prevent creating additional biological issues that will arguably be set into motion by the approval of proposals 35 and 36.

Belinda Baber
402 Shelle Rd.
Manhattan, KS 66502



To whom it may concern,

Please stop the aerial hunting of Alaskan wolves! The entire country is watching to see what you do.

Jessica and Turner Burns (age 7)
Philadelphia, PA



Dear Alaska Department of Fish and Game Board

I write to **OPPOSE** the Support of Ariel Killing of Wolves IN THE TWO GMU'S 15A AND 15C ON THE KENAI PENINSULA.

Please look at the research by your own department that clearly shows that in area GMU 15A, there is not enough food to feed the moose.

Killing the wolves is NOT going to solve the problems for the moose (and may help to support better moose genetics for stronger moose in the future.)

In area GMU 15C, there is documentation that shows that hare (which are at peak populations) eat the same willows as the moose eat and depend on for sustenance throughout the year. Killing the wolves would be counter-productive to your goal of getting the moose more of what they need to survive.

Please, STOP AERIAL KILLINGS OF WOLVES.

Sincerely,

Catherine Lord



I am in opposition to proposals 35 and 36 because I believe this action is a short-sighted view of the continuing development of viable ecosystems. I believe if nature is allowed to progress as intended that the long term result will benefit all, animals, plants and humans.

Please consider allowing all to progress at their own rate and in the end all will balance. Thank you.

Patricia Field



- The ADF&G's own research clearly shows that in GMU 15A habitat is what is limiting moose populations, and **even if wolves are killed the moose will still have far too little to eat.**
- In GMU 15C, moose population goals have been met and the **killing of wolves would constitute a blatant attempt at game farming.** The result would be significant negative impacts on the integrity of the ecosystems.
- Another issue in 15C is the well-documented sustained peak in the hare population. When the hare population is this high they constitute a major part of the wolves' diet. Therefore, **killing wolves would be counter-productive because hares feed on the same willows which are a staple food supply for moose.**
- The Kenai Peninsula is a world-renowned, year-round recreation area for Alaskans and visitors alike, and supports several population centers. **Indiscriminate aerial wolf hunting would be contradictory to the lifestyle and economy of this area.**

Jolee Josephs



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

I OPPOSE PROPOSALS 35 & 36

- The ADF&G's own research clearly shows that in GMU 15A habitat is what is limiting moose populations, and **even if wolves are killed the moose will still have far too little to eat.**
- In GMU 15C, moose population goals have been met and the **killing of wolves would constitute a blatant attempt at game farming.** The result would be significant negative impacts on the integrity of the ecosystems.
- Another issue in 15C is the well-documented sustained peak in the hare population. When the hare population is this high they constitute a major part of the wolves' diet. Therefore, **killing wolves would be counter-productive because hares feed on the same willows which are a staple food supply for moose.**
- The Kenai Peninsula is a world-renowned, year-round recreation area for Alaskans and visitors alike, and supports several population centers. **Indiscriminate aerial wolf hunting would be contradictory to the lifestyle and economy of this area.**

I SUPPORT PROPOSAL 43

Current regulations are outdated and fail to recognize the important role beaver habitat plays in healthy ecosystems for fish, birds and other wildlife. Specifically, current regulations fail to consider the installation of beaver pond flow devices as a method of preventing or alleviating property damage.

I SUPPORT PROPOSAL 127

The Alaska Center for the Environment submitted this well-researched proposal that we ask you to support for the following reasons:

- **Hundreds of bears have been killed over the past three years after being caught in a snare, including black bears, brown bears, sows and sows with cubs in this ADF&G "experiment".**
- This indiscriminate and cruel practice is spreading throughout the state, and if **the BOG approves this, anyone will be able to apply for a permit to snare bears.**
- A recent scientific report shows **independent scientists are concerned that Alaska is headed down the same path as every other state which once boasted healthy bear populations.**

Thank you, Jed B. Zimmerman



I am highly opposed to aerial wolf hunting and Proposals 35 and 36. Wildlife must be revered, not destroyed. Just because hunters want to take trophy moose does not mean that another creature must be cruelly destroyed. You must find a balance in nature in Alaska.

I came there to see the wildlife, not kill it! Indiscriminate killing of wolves is not productive as other animals contribute to moose food supplies dwindling, to include hares. Wolves help to control the hare population. Your proposals to allow aerial hunting of wolves could very well lead to the decimation of moose food by the proliferation of the hare population should their predators, especially wolves, be eliminated.

Please **support Proposals 43, and 127** based on extensive research of beavers and bears and oppose the approval of Proposals 35 and 36.

What are you people thinking? You need to study the damage done to the African wildlife by hunters. Several species are near extinction just to fill the coffers of hunting clubs, guides, and poachers.

Pamela M Edgemon



Dear Alaska Dept. of Fish and Game:

I am writing on behalf of Friends of Animals, and our 200,000 members—many of whom are residents of Alaska. We were founded in 1957, and our mission is still the same: to stop animal exploitation, wherever it occurs.

We oppose all measures used to manipulate, exploit and/or kill wolves—in Alaska or elsewhere. Therefore, we **strongly oppose proposals 35 and 36**—which allow for aerial wolf-killing. Not only is killing wolves inhumane and unethical, it's contrary to any legitimate, peer-reviewed science, which—over and over again—shows that wolves and other free-living animals can balance their own populations. Using killing (and other forms of manipulation) as a management scheme is anti-science and anti-natural selection.

Your own research shows that habitat is what is limiting moose populations—and even if wolves are slaughtered, that won't mean more moose (for hunters to slaughter).

Friends of Animals also **supports proposal 43**—which recognizes the value of the beaver in the local ecosystem.

Friends of Animals also **supports proposal 127**—which prohibits black bear snaring.

Alaska is a beautiful state that is home to countless free-living animals—which, more than ever, need protection and respect. We hope that officials in Alaska fall on the side of justice and do what's right: let them be. Wolves (beavers, bears, et al) deserve a life that is free from human intrusion.

Sincerely,

Dustin G Rhodes

Dustin Garrett Rhodes

Capital Correspondent

Friends of Animals

1810 Ingleside Terr. NW Suite 4

Washington, D.C. 20010



OPPOSE 35,36

The proposals for control of wolf populations in the Kenai Peninsula in deference to moose are not based on well-established science or an understanding of the drivers in this ecosystem. The culling of wolves will not enhance moose populations as the area is suffering from lack of available food, not over-predation. Additionally, suppression of wolf populations will lead to a surge in hare numbers further exacerbating the plight of moose as they directly compete with hare for food supplies.

The proposed plan reeks of political manipulation in favor of trophy hunters and not biologically sound management. Please add me among the many in strong opposition to the Alaska Department of Fish and Game's proposals 35 and 36 on the Kenai Peninsula. Thank you for your consideration.

Mary Jo Graham
West Falls, NY



I strongly oppose the aerial shooting of Kenai Wolves.

According to American Indian culture, the Wolf is one who shows the way to new insights and knowledge. The Wolf has keen senses, a strong urge to express its individuality and is devoted to its family. These are qualities that demonstrate the closeness of the bond between Wolf and man. Maybe that's why people shoot them. They can't legally shoot people, so they shoot Wolves. Shooting wolves would leave their puppies alone and unable to defend themselves. Wolves are much better than man will ever be. They even take puppies to care for them when their mother has been killed.

I can't image a more cruel fate than having your hand caught in a noose and unable to free yourself. The pain must be unbearable (no pun intended). Plus maybe having two of your cubs that cannot defend themselves standing right beside you.

Whoever thought of both of these plans must be a very heartless person. Otherwise how could anyone kill like this.

Ardis Skillett
37616 Montezuma Valley Road
Ranchita, CA 92066



To the Board of Game:

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 internal meetings and deliberations. 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. I would love to see how you use science to justify this program.

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



I am in opposition to proposals 35 and 36 regarding aerial wolf killing to be discussed in your January 13th meeting.

ADF&G has indicated, in its research, that it is not wolves responsible for the decreasing moose population, rather, it is habitat. A record number of hares exists which is a main staple for the wolves. To kill them off will leave more hares to compete with moose for willow saplings. There isn't enough food for the moose and to kill wolves will make the situation worse.

I am in support of proposal 43 to prohibit killing of beavers. Beavers are a necessary for a healthy and balanced ecosystem.

I am also supporting proposal 127 which will prohibit bear snaring. Passing such a proposal will enable anyone to get a permit for this extreme form of hunting. One of the BOG members explained to me at the April 2011 meeting that trappers are well trained and know what they are doing. Snaring bears is brutal, especially if it is a sow with cubs and even more so with someone who does not know what they are doing and gets bycatch in the snare.

The BOG, as a professional organization, should be basing decisions on the scientific research and not on special interests.

Sincerely,

Susan Valenti



I strongly **oppose proposals 35 and 36**. The Board of Game has requested these proposals, not Alaska Department of Fish and Game biologists; thus, they are not based on science.

In GMU 15A, wolves are not the problem – it's poor habitat. Since killing wolves won't solve the issue, it simply doesn't make sense to waste the state's money by implementing aerial gunning on only 3 percent of the wolves' range.

In GMU 15C, wolves have become the scapegoat for the overharvest of bulls. Moreover, how can the BOG propose to reduce the unit's wolf population by 50 percent when we're not exactly sure how many wolves are there? Wolves are a keystone species, much like the keystone at the top of an arch. If this proposal were to pass, and wolves are "accidentally" decimated, this unit's ecosystem will suffer.

Furthermore, I strongly **support proposal 43**. Beavers create rich, watery habitat for fish, birds, and other wildlife. Beaver damming provides benefits for humans as well. The water downstream of dams is cleaner and requires less treatment for human use.

Lastly, I strongly **support proposal 127**. This sort of indiscriminate killing must stop. It's appalling that in the past three years, hundreds of bears (black bears, brown bears, sows, and sows with cubs) have been killed.

In conclusion, I **OPPOSE** proposals 35 and 36. I **SUPPORT** proposals 43 and 127. Thank you for considering my comments

Sincerely,

Ms. Helen Yi
6211 Serena Place
Rancho Cucamonga, CA 91737



Dear Board of Game members:

As an admirer of your state and of the qualities that make it unique, including the magnificent wildlife that you are charged with managing, I respectfully urge you to follow prevailing scientific evidence and **reject Proposals 35 and 36**. Additionally, and for the same reasons, I would ask that you **accept Proposals 43 and 127**.

Your decision to protect wolves, beavers, and bears from inhumane and indiscriminate slaughter would send a clear and laudable signal that the state of Alaska is not beholden to special interests, but takes seriously its role of sustaining healthy numbers of all wild creatures for generations to come.

Sincerely,

Iain Macdonald

1935 H Street; Apt. 16 M2

Arcata, CA 95521



To the Board of Game,

I am writing today to ask you to oppose proposals 35 and 36 - the airborne killing of wolves. Evidence has shown again and again that wolves are NOT the problem with the decline of moose population. It is insane to allow these proposals to pass.

I would recommend instead you encourage folks in these areas to do some re-planting of willows. I have transplanted many willow twigs on my own property and the moose are happy here. Besides, we need all the predators we can get right now to decimate the snowshoe hare population. I always hear of a 7 year cycle of hares, but in my 30+ years of living in Homer, I have NEVER seen the population as high as it is right now. The hares are decimating gardens, fruit trees, young spruce trees, blueberry bushes, etc. Personally, I would like to see you eliminate trapping of lynx and wolves in this area until the snowshoe hare population drops down. That would be the best thing you could decide.

So again, my recommendations:

- 1) instead of getting people to airborne hunt wolves - encourage people to plant willow twigs instead, and also
- 2) limit trapping of lynx and wolves in the Kenai Peninsula region until the snowshoe hare population is in check again.

Thanks for your time,

Susan Post
Homer, Alaska



Dear Board of Game,

Oppose 35 and 36

While my 8 month old daughter naps, I have a moment to turn on facebook & learn about an aerial shooting. Wolves are one of the foremost necessary predators our country needs. They are native, majestic & at the top of their food chain. In years to come, while my daughter takes her afternoon naps, I pray she will dream of the experiences she has had in her present; much of the her present will be surrounded by nature & its inhabitants. Although trips to the zoo, stories in the books, sounds from recordings are great enrichment, nothing tops seeing an animal thrive in the wild, in their natural habitat.

I fear aerial shootings are just another way to "band-aid" a problem that ones involved don't want to resolve or negotiate. It's unnatural & barbaric. It attracts trophy hunters not conservationists. Please reconsider options. There must be a way to humanely relocate these creatures.

Alaska you do not want this on your conscicus, your tourist dollars will not be so green & I would love to take my daughter to Alaska to see your wolves but if this shooting goes on, we will not visit.

Thank you for your time

Ayme Gomoluch-Sims



Alaska Board of Game,

As visitors to your state and concerned citizens, we would like to voice our opposition to proposals 35 and 36, which would allow for the unjust killing of Kenai Wolves. Also, we wish to voice our support for proposals 43 & 127. Thank you for your consideration.

Respectfully submitted,

**Joseph & Carol McVeigh
3 Kimberli Court
Santa Fe, New Mexico 87508**



I oppose the aerial killing of the wolves of Kenai. My husband and I visited this area some years ago and were in awe of the wonderful wildlife. The viewing of wildlife is the reason we vacation in Alaska. The inhumane killing of wolves casts a pall on Alaska and the wonderful reasons to maybe visit in the future.

Chris Dewey
South Jordan, Utah



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

My husband and I have visited the Kenai Peninsula and have family members living there. I am concerned about several proposals to the ADF&G for January 2012.

We strongly **oppose Proposals 35 and 36** which authorize airborne killing of wolves in two game management Units on the Kenai Peninsula. Scientific studies do not support the killing of wolves to increase the moose populations. This would upset the balance of nature: wolves eat hares and hares eat willows. The willows supply food for the moose. Aerial wolf hunting is and should be a thing of the past. People who visit Alaska to experience wild systems would, for the most part, find the idea abhorrent and not based upon science.

We **support Proposal 43**, which would update regulations on trapping nuisance beavers to control property damage. It is common knowledge that beavers play an important role in healthy habitats and they support fish, birds and other wildlife.

We also **support proposal 127**, which prohibits the snaring of black bears. Snares represent indiscriminate killing of sows & cubs and other wildlife. It is a cruel and archaic practice that has no place in modern understanding of biological systems.

Alaska represents wildlife - living wildlife to most of those who visit. Game management needs to be in sync with science and a contemporary understanding of biodiversity, where a balance in nature is supported.

Thanks for allowing us to submit comments on these important issues,

Sincerely,

Marc and Marnie Gaede
772 Caldera Curve
South Fork, CO 81154



Dear Members of the Alaska Board of Game:

I am writing to respectfully say that I strongly **OPPOSE Proposals 35 and 36**. Science does not support the need for airborne killing of wolves. It has been shown that your own research provides evidence that in GMU 15A habitat is what is limiting moose populations. Even if wolves are killed in this heinous matter, it will not solve the problem that the moose have too little to eat. I also oppose this because in GMU 15C the moose population goals have been met so there is no reason for killing wolves in this matter except to serve special interest groups. It is not responsible science. In study after study wolves have been shown to have a huge positive impact on ecosystems; killing them needlessly will only have a **NEGATIVE** impact.

Another reason for this is that in GMU 15C, the well-documented sustained peak in the hare population has been shown to constitute a major portion of the wolves' diet. If you kill the wolves, the hares will continue to have a sustained high population (and will likely grow) and they will be eating the willows...the same food source so desperately needed by the moose that you want to remain in these areas. I don't understand why you would kill the wolves who eat the hares who will otherwise cause a much lower food supply for the moose.

Sound science says that killing the wolves does not make sense, for all these reasons.

I have family that lives on the Kenai Peninsula and would like to visit them in the next few years as other family members have. **NONE** of us want to visit a place where aerial gunning is allowed.

I would also like to ask you to SUPPORT Proposal 43 which asks you to update your regulations regarding beaver trapping. Like wolves, beavers have been shown to have a healthy impact on ecosystems and outdated regulations need to be studied and updated with the latest science-based information.

Finally I would like to ask you to support Proposal 127 to prohibit black bear snaring, which is a horrible practice that kills bears indiscriminately regardless of species and whether or not it is a sow with young cubs that need her to survive.

Thank you.

Sincerely,

Tara Morrison

White Bear Lake, Minnesota



Dear Board of Game members,

In regards to proposals being discussed and decided in your January, 2012, meeting:

Proposals 35 & 36: I **oppose** passage of these two proposals. I believe the research performed by ADF&G that indicates that the moose population in GMU 15A is restricted by lack of habitat, rather than by wolf kills, and that the aerial wolfing hunting will be ineffective toward the efforts of increasing the moose population. The moose simply have far too little to eat to support an increase in the local moose population. It is a much too populated area to be safely performing aerial hunting of any kind.

Proposal 43: I **support** this proposal to update regulations regarding "nuisance" beavers to control property damage. Although beavers can be a nuisance, they certainly provide a useful and necessary function in maintaining a healthy ecosystem for fish, birds, wildlife and inevitably – us. Other options need to be adopted.

Proposal 127: I **support** this proposal which would **prohibit** black bear snaring. Personally, I feel it doesn't go far enough and should prohibit all bear snaring! This is an inhumane, indiscriminate and cruel practice which should be eliminated from all levels of bear enforcement within the state of Alaska. I do not condone this practice and neither should you.

Mike Adams
PO Box 672009
Chugiak, AK 99567



I OPPOSE 35 and 36

Having grown up in a predominately hunting area, and family, in CO I support hunting.

A large part of hunting for me as a kid was the entire experience of the hunt. Getting out and being in nature, time spent with family and friends, learning about wildlife and the ecosystem, all of these things were larger and more important than the actual taking of any game. Whether or not any particular game was taken during the hunt was a bonus. Even though I no longer hunt I still support it and understand the need for it, as a wildlife management tool and a source of state income.

I also support Wildlife Management of all Wildlife and am well aware that hunting is the largest tool available for management.

However Aerial gunning is not a practice I consider to be "Hunting". It's a deplorable act that should be outlawed as well as boycotted by all, true, hunters. In today's fast paced life style, Aerial gunning seems to go right along with the continued downfall of the moral fiber of our society. How does one learn anything about nature or the game they are hunting if they never have to make an effort other than climbing into a helicopter or airplane?? Answer: They don't!!!

If we had to make a little more effort to accomplish the things that we do, we would have a greater appreciation of the accomplishment as well as a greater understanding of our goals.

This is not hunting and should be stopped!!

--

Kevin Nahler



OPPOSE 35, 36

I am writing this email as a concerned citizen, tourist, animal lover, and wildlife protection advocate. I am writing to address the impending vote on Proposal 35 and 36 and to voice my opinion against it. Several reasons I am against these proposals are as follows:

The Kenai Peninsula is spectacular example of wildlife recreation year-round recreation and supports several population centers. **Indiscriminate aerial wolf hunting would be contradictory to the lifestyle and economy of this area. I and many of my friends are strongly opposed to damage that these proposals would bring upon the people of this area.**

The ADF&G's research clearly shows that in GMU 15A habitat is what is limiting moose populations, and **even if wolves are killed the moose will still have far too little to eat.**

Recent research shows that in other ecosystems, namely Yellowstone National Park, the presence of wolves has actually transformed the ecosystem for the better. Something to consider as tried and true.

I hope you will take my email and others like it seriously. Please support the lovers of wolves and nature and sustainable ecosystems for our future and our children's futures.

Thank you for your time and consideration!

Sincerely,

Maria Lazarus



To: Alaska Board of Game Members

From: John Wolverton; US Citizen; Missoula, MT

Date: December 29, 2011

RE: OPPOSE Proposals #35 and #36, GMU 15c

Dear Board Members,

The proposals to allow aerial killing of wolves are based on poor economic assertions and are not supported by science, and not recommended by your own fish and game biologists.

The predator prey relationships and food networks in the wild are more complex than the proposals misapplication of an overly-simplified notion that only wolves cause moose mortality.

Wolves keep prey moving which in-turn limits riparian browsing, which in-turn is healthy for fisheries. If any amount of wolves are removed from the equation, the ungulates will further over-browse and ultimately cause their-own population collapse.

Habitat is the overarching limiting factor of ungulate population numbers, no matter how many predators may or may not be present.

The wolves also feed on other prey species, such as hares, which also has a cascading effect on vegetation and forage. Any over-zealous harvest of wolves would negatively effect the habitat as all the prey species populations would initially increase, then crash as they over-consumed the browse and forage.

No aerial killing of wolves should be allowed or even considered.

Sincerely,

John Wolverton

1637 S 8th St W

Missoula, MT 59801



Dear Alaska BOG:

As residents of Alaska, we strongly oppose proposals 35 and 36. There is no scientific reason to kill or manage wolves on the Kenai peninsula.

Although we travel the Kenai regularly, we have yet to observe a wolf in the area. Our right to experience wildlife viewing in Alaska is trampled upon, whenever you cull a species in favor of one user group.

Thank you,

Andra Silgailis and Karlis Stolcers
Palmer, Alaska

December 29, 2011



To the Board of Game re Proposals 35 and 36

I strongly oppose these two proposals. 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. Aerial wolf control is being authorized without adequate consideration of other factors such as habitat condition and bear predation. It is now well documented that in order to be effective wolf control must be drastic and practiced year after year indefinitely. I would like to see aerial wolf control completely abolished as a method of wolf control.

Katharine Richardson
Box 80766
Fairbanks, AK 99708



OPPOSE 35, 36
SUPPORT 43,127

Dear Alaska Board of Fish and Game,

I am writing to express my opposition to the current predator control policies being considered, including the aerial pursuit of wolves, and the unethical practice of bait and snare for bear and Alaska's wildlife in general.

I relocated to Alaska 4 years ago because the designer "forests" in the midwest are sterile and lifeless. I applauded Alaska for being the last intact ecosystem in the US, and since relocating, I see the very ecosystem I admire is under constant bureaucratic threat.

When I read about the extermination of wolves and bears in the lower 48 to make way for farming and "progress", then saw first hand the need for the extermination of the ensuing over-populations of deer, raccoons, feral cats, etc., the logic just isn't there. Replacing predator species... currently an increase in the coyote population in the midwest... bandages the problem, while the larger predators are lacking to control the coyotes.

When will we learn to accept our inability to intelligently control our environment? Recent science explains that beavers create necessary habitats for the very moose the hunters seek. Yet they aren't creating that pond where it's convenient for humans, and therefore must be exterminated.

The bounties placed on bald eagles & beluga whales to increase salmon populations are but 2 examples of misguided governmental policies that created the loss of abundant species that have not fully rebounded, contrary to talking points.

I can respect people who harvest their own food legally and honorably, but creating a haven for hunters so the state can increase revenue generated by the availability of prey animals is unethical and misguided.

As an Alaskan, albeit a recent transplant, I intend to fight for the wildlife that makes this the most unique, beautiful, and natural state, and the only place I choose to call home. Predators are vital for the experience that is Alaska. Thank you for your efforts to protect wildlife for us all... including people who live here specifically to coexist peacefully.

Sincerely,

Patrice M. Lecso
South Knik River Resident



Oppose 35 & 36

TO WHCM IT MAY CONCERN,

To shoot wolves from a plane are cruel to animals. If they aren't killed right away they suffer. There is no reason the kill any animal. All animals were put on this earth for a reason. What has a wolf ever done to you. We are taking all there living spots where they have no place to go, Isn't it time to leave them alone. How would you feel if something shot you from a plane and just injured you just to feel pain. ISN'T IT TIME TO LEAVE WOLVES AND OTHER WILDLIFE ALONE!!!!

Frank Haviland

=



We oppose 35 and 36

On behalf of my family and self: We have traveled Alaska and loved your beautiful wild places and also your cities, towns and stretches of tundra. We have spent wonderful summers camping, hotel-ing, and exploring during the Tony Knowles days; and would love to revisit your State.

Unfortunately, Alaska's more recent policies of killing wolves from the air is so barbaric, unsporting, and immoral --by our standards -- that we are all agreed not to summer in Alaska again until we don't have to be ashamed of ourselves for spending a dime in your state.

It is apparent that recent administrations--including the present one--have respect for blood sport and money; but absolutely none for Alaska's natural ecology and the creatures that are meant to co-exist within it.

Please join the 21st century and have some regard for the values of the majority of Americans--and Alaskans--who don't want to decimate wolves to please sport hunters, and can't abide the notion of shooting ANYTHING from an aircraft.

Thank you,

The Zucker family
1966 Orchard St.
Eugene, OR 97403



Dear BOG,

I am writing to **oppose** propositions **35 and 36**, which authorize the airborne killing of wolves in two Game Management Units on the Kenai Peninsula.

A former resident of Alaska and student of wildlife biology, I studied the effects of aerial predator control programs of wolves on population dynamics between them and their prey. I know aerial hunting to be a biologically unsound and frivolous action.

It seems to me that it is politically motivated to harvest moose for out-of-state sports hunters, because otherwise there seems to be no valid census information on wolf and moose populations to justify these actions.

I urge you to reject these proposals outright and instead implement a well-rounded wildlife management plan that emphasizes conservation over control. Thank you for listening.

Sincerely,

Laura Kiesel



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

I most definitely and most vehemently oppose Proposals 35 and 36. I oppose the authorization for the airborne killing of wolves in two Game Management Units on the Kenai Peninsula. It is appalling to discover that the Board of Game itself requested that aerial killing of wolves be allowed. This is more likely due to the fact that these special interest commercial hunting organizations want to wipeout the wolves from civilization. Their request is certainly not science-based!

The Alaska Department of Fish and Game has research that clearly proves that even if the wolves are killed the moose will still not have enough to eat...the GMU 15A habitat is behind the limited moose populations. The limited moose population is not due to wolves!

In fact, research by Alaska Department of Fish and Game noted that in GMU 15C, moose population goals have been met. So, if Proposals 35 and 36 were passed this would now be considered game farming. If this happened, there would be a tremendous negative impact upon the ecosystem.

Another important issue to consider is the hare population---It is well-documented that the hare population in 15C is at a well-sustained peak. The hare is a major part of the wolves diet...so if wolf populations diminish, the hare populations will greatly increase causing problems for other animals such as moose. The hares would be consuming more willows which is well known and always considered as a staple food for moose.

What many forget to consider is the many tourists that seek out the beauty that the Kenai Peninsula has to offer. It is a world-renowned recreation, nature area for many visitors and residents of Alaska. The indiscriminate aerial wolf hunting would compromise several population centers...which in turn will negatively affect the economy and the lifestyle of those populations.

I want to **support Proposal 43**...the current regulations are terribly outdated and they definitely fail to recognize the importance of a healthy beaver habitat. Beaver habitat's have a very important role in healthy ecosystems. Something to consider is the installation of beaver pond flow devices to alleviate or prevent property damage. Trapping beavers is not the solution!

I want to **support Proposal 127** which would prohibit the inhumane black bear snaring! This proposal has been well researched by the Alaska Center for the Environment. Proposal 127 is important because it is based upon research/studies. Black bear snaring has been the cause of hundreds of bears being killed over the past three years...and this also includes the killing of brown bears, sows and sows with cubs! This snaring is indiscriminate and is a very inhumane practice. It should also be considered alarming that anyone will be able to apply for a permit to snare bears.

p. 1/2



A very recent scientific report shows that some scientists are highly concerned that the state of Alaska is fastly becoming like many other states that once had healthy bear populations only to become states with unhealthy bear populations. This scientific fact most definitely would apply to the senseless killing of our country's beautiful wolves and many of those states will end up having no wolves or unhealthy populations which negatively affect the ecosystem and their economy.

"The greatness of a nation and its moral progress can be judged by the way its animals are treated."

—Ghandi

Sincerely and Thank You,

Lisa Budz
4004 South Gunderson Ave.
Stickney, IL 60402

p. 2/2



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

Dear Board Members,

I strongly oppose Proposals 35 and 36, which would authorize aerial killing of wolves in two Game Management Units on the Kenai Peninsula. These proposals are geared towards reducing the number of wolves in order to artificially boost the moose population for the benefit of human hunters. Humans no longer need to hunt in order to survive. Declines in large game animal numbers are mainly caused by human activity. Killing wolves won't solve that problem, ever.

Furthermore, I support Proposal 43, calling for updated regulations regarding beaver trapping, and Proposal 127 prohibiting black bear snaring.

I would love to visit Alaska, but refuse to spend one cent in your state as long as aerial "hunting" and snaring of wolves and bears is allowed while sound biological science is ignored. Alaska receives revenue from the sale of hunting tags. Alaska also receives revenue from tourism, and I'd be surprised if hunting revenue is more than tourism revenue. Most people visit Alaska to see it's beauty and wildlife...all of it's wildlife.

Thank you for considering my comments.

Sincerely,

Karen Silva
Central City, CO



I oppose Proposals 35 and 36

The Alaska Department of Fish and Game's own research clearly shows that in GMU 15A habitat is what is limiting moose populations, and that **even if wolves are killed the moose will still have far too little to eat.**

In GMU 15C, moose population goals have been met and the **killing of wolves would constitute a blatant attempt at game farming.** The result would be significant negative impacts on the integrity of the ecosystems.

Another issue in 15C is the well-documented sustained peak in the hare population. When the hare population is this high they constitute a major part of the wolves' diet. Therefore, **killing wolves would be counter-productive because hares feed on the same willows which are a staple food supply for moose.**

The Kenai Peninsula is a world-renowned, year-round recreation area for Alaskans and visitors alike, and supports several population centers. **Indiscriminate aerial wolf hunting would be contradictory to the lifestyle and economy of the area.**

I support Proposal 127. Black bear snaring should be outlawed. **Hundreds of bears have been killed over the past three years after being caught in a snare,** including black bears, brown bears, sows and **sows with cubs** in the Alaska Center for the Environment "experiment". This indiscriminate and cruel practice is spreading throughout the state, and **if the Board of Game approves this, anyone will be able to apply for a permit to snare bears.** A recent scientific report shows **independent scientists are concerned that Alaska is headed down the same path** as every other state which once boasted healthy bear populations.

However, I am in favor of Proposal 43:

Updating regulations regarding trapping "nuisance" beavers to control property damage. **Current regulations are outdated and fail to recognize the important role beaver habitat plays in healthy ecosystems for fish, birds and other wildlife.** Specifically, current regulations fail to consider the installation of beaver pond flow devices as a method of preventing or alleviating property damage.

Sincerely,

Susan Shaulis



I am against the aerial killing of Kenai wolves. This is totally barbaric and not worthy of a supposed civilized society.

Furthermore , the ADF&G's own research clearly shows that in GMU 15A habitat is what is limiting moose populations, and **even if wolves are killed the moose will still have far too little to eat.**

- In GMU 15C, moose population goals have been met and the **killing of wolves would constitute a blatant attempt at game farming.** The result would be significant negative impacts on the integrity of the ecosystems.
- Another issue in 15C is the well-documented sustained peak in the hare population. When the hare population is this high they constitute a major part of the wolves' diet. Therefore, **killing wolves would be counter-productive because hares feed on the same willows which are a staple food supply for moose.**
- The Kenai Peninsula is a world-renowned, year-round recreation area for Alaskans and visitors alike, and supports several population centers. **Indiscriminate aerial wolf hunting would be contradictory to the lifestyle and economy of this area.**

I have visited Alaska with my family three times in five years to see wolves, including a stay at Denali. Please don't let this happen!

**Linda Maslin
Blue Bell, PA**



Oppose 35 and 36

Please stop killing these beautiful animal....they are only doing what nature intended them to do....kill for food. Have seen horrific pictures of some of these kills with [eo]le glorifying themselves with the bloodied bodies of these poor creature.....live and let live

Eileen Brown



Board of Game,

Please vote NO on proposals 35 and 36 having to do with aerial hunting of wolves.

Charmi Weker



We oppose the proposals 35 and 36 .

These proposals provide authorization for the airborne killing of wolves in two Game Management Units on the Kenai Peninsula. They are simply an anti-science "gift" to the special interest commercial hunting organizations, and were requested by the BOG itself, not Alaska Department of Fish and Game biologists.

Viviane Vanbuggenhout



Members of the Alaska Board of Game--

I respectfully ask that you vote NO on Proposals 35 and 36, which are a gift to the special interest commercial hunting interests.

The Kenai Peninsula is a famous recreation area of Alaskans and visitors alike. Indiscriminate aerial wolf hunting would have an adverse effect on the lifestyle and economy of this area.

I also urge that you SUPPORT Proposal 43 and Proposal 127.

Thank you for your attention in this matter.

Sincerely,

Nikki Doyle
839 Rosemount Road
Oakland, CA 94610



You can throw my name in the hat for people **AGAINST** the aerial slaughter of wolves. I think it's a despicable practice. I was fortunate enough to be at McNeil this past July and we are planning on coming to Alaska in July 2012 for our 40th anniversary. If this killing continues, we won't be spending any dollars in Alaska.

Bruce Faanes



To whom it may concern,

I'm asking that you do not allow this aerial wolf hunt to happen. Its bad enough that wolves and other precious wildlife is hunted at all, but the fear and terror caused by being tormented from planes and helicopters above and chased until exhausted is far from being a "fair" hunt. There is no "sport" in chasing an animal who is easily spotted from above and then chased, most times while injured, until there is no chance for survival left.

Alaska, Wyoming and Idaho have been my favorite places to visit because of the wildlife there. I spent \$1,000's of dollars in these states each year visiting so that I can see the animals in their natural environment where they belong. I'm even in the process of moving now so that I can be closer to them. However, it doesn't seem like what these wonderful animals bring to your economy is even being considered these days - it should be. A wolf, as well as grizzly bears and moose, are worth far more alive than dead.

Thank you for your time. I hope this is stopped.

Laura Cowen



Dear Sirs or Madams,

I am writing this to you to urge you to stop the senseless aerial shooting of the Kenai Wolves, it is clear that this measure is not a solution to the Moose population diminishing, the Wolves as you know keep the Hare populations in check in turn preventing the hares grazing on the willows which make up the staple diets of the Moose.

The killing of the Kenai wolves would constitute a blatant attempt at game farming and is a totally unnecessary practise.

Yours Sincerely.

Syd Low



I'm writing to let you know I oppose Board of Game's proposals 35 and 36. Aerial hunting of wolves is not only considered in humane because of decreased accuracy in those shooting, but there is no good reason to exterminate those wolves in the Kenai Peninsula. Moose populations are down due to habitat reasons, not wolves being their predators. In fact, killing wolves will upset the ecosystem because wolves are known to provide balance to mother nature and restore it to its original strength.

I'd also like to voice my support of proposals 43 and 127. Trapping nuisance beavers is unnecessary with newer beaver pond flow devices in place; and like the wolf, beavers help restore ecosystems and should be allowed because they enable nature to flourish.

As for proposal 127, bear snaring is cruel and inhumane and should be banned for that reason alone. When considered in conjunction with the fact that snares would increase the number of bears killed and possibly hurt their population numbers, prohibiting Black bear snaring is a no-brainer.

Thank you for your time and consideration,

Laura Sneddon



Board of Game:

I'm expressing my opposition to proposals 35 & 36. Reasons are well covered by many others, just stating my **opposition** for reasons you have already heard. Do not pass these proposals.

Sincerely,

Brian Beckwith
16738 Theodore Drive
Eagle River, AK 99577



I oppose 35 and 36

GMU 15A habitat does not have enough food to sustain the moose & killing the wolves will not change that! You are messing with the ecosystem & not in a good way. You are taking a huge risk by killing wolves in the Kenai Peninsula where tourists come to see the wildlife including wolves. These are America's wolves, not yours & you have no right to gun them down to serve the commercial hunting organizations.

Teresa Hicks
4590 Elk Vale Rd
Rapid City, SD 57701



To whom it may concern,

I would like it to be known that I, Fernando Melian, am in opposition to the proposed aerial gunning of Alaska's wolves. I firmly **oppose Proposals 35 and 36**, which would authorize aerial wolf control in the two Game Management Units on the Kenai Peninsula.

I am in opposition to these proposals because aerial gunning is not only cruel and inhumane, but there is clear evidence and recent scientific research, which has proven that keystone species are undeniably the invaluable pieces of the world's ecosystem puzzle. Most apex predators are considered to be keystone predators and these predators play an incredibly essential role in maintaining the structure of their individual ecological community by balancing predator and prey numbers. Wolves are an excellent example of a keystone predator. To put it simply, when wolves are present, their ecosystems are healthy.

The Alaskan Department of Fish and Game's own research even shows that the Game Management Units' habitat is to blame for the limiting of moose populations and would be negatively affected by the killing of wolves in the area due to the trophic cascade effect associated with the wolves since they are keystone predators as mentioned.

I would also like it to be known that I am in **support of proposals 43 and 127**. I support these two proposals for a number of reasons. One reason would be, like aerial gunning, snaring is also extremely cruel and inhumane. While other reasons include the fact that beavers and black bears, like wolves, serve their own ecological role, which holds much importance. Current regulations that regard trapping "nuisance" beavers fail to recognize this and so they are out of date and must be updated with the help from proposal 43.

As for the prohibiting of black bear snaring, I believe that proposal 127 would provide some much needed aid to a species whose populations are declining at alarming rates. The thought of hundreds of animals, including females with young, being killed over the past few years because of this barbaric and indiscriminate practice is greatly saddening. The additional thought that if snaring is approved and that anyone can apply for a permit to snare is equally saddening. I thank you for your time and look forward to hearing that a scientifically sound outcome has been achieved.



Dear Alaska's Board of Game,

This email conveys my desire for you to vote **against Proposals 35 and 36**, while simultaneously asking you to vote **for Proposals 43 and 127**.

I feel strongly about proposals 35 and 36, because the majority of the general public and I have been voting against aerial killing of wolves since at least the late 1980's. Alaska's BOG has been steadily taking the public's wishes into account, but as time passes, more and more proposals seek to still allow aerial hunting, and I want BOG to act in accordance of the public majority's wishes, sound game management practices, environmental preservation, and simply, fair hunting practices.

Please remember that Alaska's own Fish and Game biologists have pointed out that the moose population in GMU 15C, habitat is threatened by insufficient habitat, not by predators. A pursuit of elimination of competitive herbivores in the area would be much more conducive to assisting the moose than by killing wolves. Not to mention, aerial killing of wolves is undeniably game farming of an unnecessary predatorial species, since in GMU 15, moose populations have met targeted goals.

I consider wolves a significant tourist draw to Alaska, and have known numerous individuals who have gone on photographic hunts, seeking Alaska's wolves and other apex denizens. There is an undeniable affection of wolves by the American public, and I urge BOG to recognize this fact. The Kenai Peninsula is a recreational area for both tourists and Alaskans, and aerial hunting in this location would be disruptive and unwelcome. Please vote against proposals 35 and 36.

As for **Proposal 43**, new trapping regulations are needed to replace outdated regulations which don't account for the asset to property that beaver pond flow devices provide. Please vote in favor of Proposal 43.

Also, please vote in favor of **Proposal 127**; this is another hunting practice that the public has often spoken out against for decades, and which continues to need addressing. Snares are extremely difficult to regulate, as they may be applied for by virtually anyone, and snares are unfortunately indiscriminate--sows and cubs are often snared. I consider snaring to be unhealthy for a population's genetics; please vote in favor of Proposal 127, which will prohibit snaring of black bear populations. Biologists and history warn that bear populations are not as bountiful as they often appear to be; please don't let snaring eliminate bears indiscriminately, and by such a tortuous death.

Thank you, Jeanne Fedel



29 Dec 2011

Dear Board of Game,

Since we are unable to be at the January meeting in January we would like to submit our comments in advance for your review. We belong to the typically silent majority of Alaska who oppose the transformation of Alaska into a game park for hunters. We believe that nature provides a wiser answer to the balance of predator and prey, and in fact this is what I learned as a biology major in college. We do not believe that bear snaring, wolf hunts, and no-bag limits on coyotes are useful in supporting healthy populations of Alaskan prey species. You are doing irreparable harm to our ecosystem and the livelihood of many Alaskans. In addition, you are causing people around the world to view Alaskans as greedy and unsportsman-like.

We OPPOSE proposals 35 and 36.

We SUPPORT proposals 43 and 127.

We believe it is time you responded to the innumerable Alaskans who do not support your predator elimination program and do the right thing for Alaska's wildlife and people. Remember, Alaska's constitution says that Alaska's resources belong to ALL Alaskans.

Sincerely yours,

Keri Gardner and Robert Hodge

7605 Upper Huffman Rd, Anchorage

(temporarily reassigned to 808 Columbus Ave., NY)



Sirs:

After reading the articles from the Alaska Wildlife Alliance newsletter, my comments:

Oppose Proposals 35 & 36. Airborne killing of the wolves. This is not the scientific or humane method of dealing with any predator. Wolves are a very necessary factor in the balance of nature. Airborne killing is just plain "INHUMANE AND CRUEL." This method is not "justifiable."

Perhaps the "tables should be turned." Place "man," in the wild.. See how long he lasts, by himself, with no weapons!!!!

Jane Heltebrake
Perrysburg, Ohio



I would like to voice my opposition to the proposed aerial wolf hunt. Without adequate habitat, the moose will continue to decline, even with aerial hunting of the wolves. Wolves are an essential part of the ecosystem and must remain. Killing them is cruel and unjust and serves no purpose.

I would also like to offer my **support for Proposal 43 and Proposal 127**. The beavers and bears are also an essential part of the Alaskan ecosystem.

Thank you,

Deb Hochhalter
PO Box 211
Red Feather Lakes, CO 80545



**Oppose 35, 36
Support 43, 127**

Airborne killing of wolves is not a solution. You must take the area habitat into consideration and how well moose could survive. It seems to me the big push to kill wolves is nothing more than game farming for hunters. Also the area is quite abundant with a hare population. Again I see no reason to kill wolves. These wolves have every right to exist as they have for years because they play a vital part in our ecosystem. It is human interference which cause imbalance.

Update your regulations on trapping "nuisance beavers". Beavers are an important link which affects other animals for a healthy ecosystem.

As for snaring bears, it is an unconscionable, barbarically cruel and uncalled for action. Please no bear snaring.

Remember, a great many people come from all over the world specifically to see wolves and all the wildlife you're so fortunate to have.

I would appreciate your consideration in this matter.

**Sincerely,
Ruth Rollow**



The following are my comments regarding current Board of Game Proposals:

I am opposed to Proposals 35 and 36 which authorizes airborne killing of wolves on the Kenai Peninsula.

I support Proposal 43 to update regulations regarding trapping of beavers.

I support Proposal 127 to prohibit black bear snaring.

I am urging Board of Game Members to consider not only scientific data, but also humanitarian concerns. To treat wild animals like they are objects to be controlled by painful methods is extremely insensitive, cruel behavior toward the residents of our state who cannot speak our language. They are worthy of respect and consideration, even though their brains are not equipped to speak up for themselves. They do share the same emotions and feelings that humans do. Humans do have dominion over animals, but this dominion should be carried out only by humane methods.

Sharon Lowe
Anchorage, Alaska



Wilderness Inspirations™



*Photography That
Works for Wildlife*

P.O. Box 433
Emigrant, MT 59027
TEL. (406) 333-4366
e-mail: info@akwildlife.com
<http://www.akwildlife.com>

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

Support:
Proposal 43
Proposal 127

Oppose:
Proposal 35
Proposal 36

Dear Board of Game members,

We agree with retired state wildlife biologist Rick Sinnott's professional evaluation and conclusions in his excellent article, dated November 17, 2011, published in the Alaska Dispatch entitled, "Should state approve wolf-control measures on Alaska's Kenai Peninsula?"

Therefore, we OPPOSE Proposals 35 and 36.

Thanks for your consideration.

Sincerely,

Dorothy and Leo Keeler



I am writing to oppose the proposals #35 and #36 that will allow aerial wolf hunting on the Kenai Peninsula.

I also support proposals 43 and #127 dealing with beavers and black bear baiting, respectively. I've written many letters against aerial wolf hunting so I won't repeat my arguments here. I would simply like to go on record as one more person opposed to aerial wolf hunting on the Kenai, and anywhere in the state. Thanks for your consideration.

Jan St. Peters
P.O. Box 323
Healy, AK 99743



I write to express my hope that proposals 35 and 36 will be rejected.

In GMU 15A it is questionable that reducing wolf population will do much to increase the moose herd, as the habitat itself does not provide sufficient browse. In GMU 15C moose numbers are good without aerial wolf control.

When I mention to my friends in other states that we Alaskans shoot wolves from the air, they are shocked. They find it hard to believe me.

Why let hunters dictate the nature of our state? If tourists were to be given a vote, they would end this practice.

I support Proposal 127, which would prohibit black bear snaring. It seems quite possible that Alaska's bear population could go the way of that in other states. In California, for example, the state which I left in 1968 to come here, the state flag boasts a brown bear, but that image has long been a sad joke. Alaska has the opportunity to avoid mistakes made elsewhere. Please support Proposal 127.

Annie Kerin
Fairbanks



Hi,

My name is Selma,

I just write about killing wolves and what may affect the environment and us, human beings at long term:

1- A simple logic in ecosystem balance:

If there's a lack in one element of the chain, there's a consequence on the rest of the chain:

There's a strong relationship between the hare population and the wolves population

2- The impact on the economy:

The Kenai Peninsula is a world-renowned, year-round recreation area for Alaskans and visitors alike, and supports several population centers. An indiscriminate aerial wolf killing will affect the economy of that area.

I do hope that aerial killing of Kenai wolves will stop.

We, human beings, are responsible of our environment and each of our actions have a profound impact on it!

Selma Saidane



Alaska Board of Game,

I strongly oppose the unnecessary killing of wolves in the Kenai peninsula that is authorized in proposal 35 and 36. Science proves that this action will degrade the ecosystem, and will not support healthier moose or increase their population. I support hunting moose, but propositions 35 and 36 are poor solutions to this problem, and will make the problem worse. I ask you to not pass proposal 35 and 36.

In addition, I support proposal 127, which would eliminate bear snaring. Again, I have friends who hunt bears, and I support any measure that supports a healthy bear population. Snaring bears has the potential to reduce the population of bears significantly, promotes waste, and will ultimately bring in fewer tourist trophy hunters that bring in a significant amount of money to the state's rural areas.

Sincerely,

Emily Niebuhr
6412 Fairweather Dr
Anchorage, AK 99518



I strongly oppose the slaughter of wolves as outlined in Proposals 35 & 36 before the Board of Game for the Alaska Dept. of Fish & Game.

This is an unholy interference in the eco system and would further contaminate the habitat already suffering from mismanagement.

A step in the directions of restoring the balance between the wilderness and the folks who choose to live there would be the passing of Proposals 43 & 127.

Yours truly,
Lyle Mayer
Eugene, Oregon



Oppose 35, 36

Please stop the killing of wolves when they do not have a chance to defend themselves. It takes a total coward to shoot anything, with the exception of a rabid dog, from a helicopter.

Why do you hate these animals so? Have they attracted you or someone you know? What have they done except feed the family they love? We put our stupid cows and sheep where they live. How many wolves have killed as sport like we do?

There are so few wolves in the country, do we not have room to share with them. Leave them alone. They want no part if us.

Thank you.

Patricia Vondruska



I oppose proposals 35 & 36

It is practices like this that saddens me deeply. Have we really sunk so low as to use planes to run down and kill wolves? Nature will tend to balance itself, and the best laid plans of mankind to manage it will only lead to unintended and unforeseen consequences!

Hands off the wolves! You don't have the right!

Bill Wallace
Mattoon, IL



I am writing to the Alaska Board of Game to plead that the board **NOT pass Proposals 35 and 36**, which would again allow aerial killing of wolves. This inhumane act would not only destroy significant wildlife, but also the fragile eco-systems.

- The ADF&G's own research clearly shows that in GMU 15A habitat is what is limiting moose populations and **even if wolves are killed the moose will still have far too little to eat.**
- In GMU 15C, moose population goals have been met and the **killing of wolves would constitute a blatant attempt at game farming.** The result would be significant negative impacts on the integrity of the ecosystems.
- Another issue in 15C is the well-documented sustained peak in the hare population. When the hare population is this high they constitute a major part of the wolves' diet. Therefore, **killing wolves would be counter-productive because hares feed on the same willows which are a staple food supply for moose.**
- The Kenai Peninsula is a world-renowned, year-round recreation area for Alaskans and visitors alike, and supports several population centers. **Indiscriminate aerial wolf hunting would be contradictory to the lifestyle and economy of this area.**

I also asking urge the BOG to **pass Proposal 43** to update regulations regarding trapping "nuisance" beavers to control property damage, as current regulations are outdated and fail to recognize the important role beaver habitat plays in healthy ecosystems for fish, birds and other wildlife. Specifically, they fail to consider the installation of beaver pond flow devices as a method of preventing or alleviating property damage. This proposal was submitted by AWA-SE Board member and Beaver Patrol member Patricia O'Brien.

I also ask the BOG to **pass Proposal 127** which would prohibit black bear snaring. The **Alaska Center for the Environment** submitted this well-researched proposal that we ask you to pass for the following reasons:

- **Hundreds of bears have been killed over the past three years after being caught in a snare**, including black bears, brown bears, sows and **sows with cubs** in this ADF&G "experiment".
- This indiscriminate and cruel practice is spreading throughout the state, and **if the BOG approves this, anyone will be able to apply for a permit to snare bears.**
- A recent scientific report shows **independent scientists are concerned that Alaska is headed down the same path** as every other state which once boasted healthy bear populations.

Scherel Carver



Hello,

I kindly request you to please put an end to the aerial killing of wolves.

Even if you do not consider the biodiversity argument to end this killing, on a humanitarian ground, please let us try our best to live and let live.

Wolves have a right to live out their lives as much as we do, so please consider their survival as well.

Thanks,

Ravi Madapati



Please stop slaughtering wildlife. Set an example for the rest of the world.
People who choose to live in Alaska should be prepared and honored to
share the land with wildlife.

Steve Easton



Dear Board of Game

I am writing to you to express my opposition to two proposals. They are Proposals 35 and 36. I oppose the aerial killing of the majestic wolves. My family and I visited Alaska over the summer. We witnessed the beauty of the land seeing many beautiful creatures. I cannot imagine a wilderness in which animals are slaughtered. Please do not go ahead with these killings.

In addition, I support Proposal 43 and 127 for the same reason I feel the aerial killings are wrong. Where must these bears go to live? Where can man learn to co exist with these beautiful, peaceful animals.

Respectfully,

Linda M. Sampson
983 Valley Road
Franklin Lakes, NJ 07417



I oppose aerial wolf killing on the Kenai Peninsula due to the lack of sound science or evidence that it's needed.

Pat Irwin
Homer



Dear Sirs,

I had the wonderful opportunity to visit Alaska and see a live wolf. What a wonderful experience, one I will remember forever!

I am asking that you:

OPPOSE proposals 35 and 36 do not provide authorization for the airborne killing of wolves in two Game Management Units on the Kenai Peninsula. They are simply an anti-science "gift" to the special interest commercial hunting organizations, and were requested by the BOG itself, not Alaska Department of Fish and Game biologists.

- The ADF&G's own research clearly shows that in GMU 15A habitat is what is limiting moose populations, and **even if wolves are killed the moose will still have far too little to eat.**
- In GMU 15C, moose population goals have been met and the **killing of wolves would constitute a blatant attempt at game farming.** The result would be significant negative impacts on the integrity of the ecosystems.
- Another issue in 15C is the well-documented sustained peak in the hare population. When the hare population is this high they constitute a major part of the wolves' diet. Therefore, **killing wolves would be counter-productive because hares feed on the same willows which are a staple food supply for moose.**
- The Kenai Peninsula is a world-renowned, year-round recreation area for Alaskans and visitors alike, and supports several population centers. **Indiscriminate aerial wolf hunting would be contradictory to the lifestyle and economy of this area.**

Please support two additional proposals:

Please Support Proposal 43 and update regulations regarding trapping "nuisance" beavers to control property damage. **Current regulations are outdated and fail to recognize the important role beaver habitat plays in healthy ecosystems for fish, birds and other wildlife.** Specifically, current regulations fail to consider the installation of beaver pond flow devices as a method of preventing or alleviating property damage.

Please Support Proposal 127 and prohibit black bear snaring. The Alaska Center for the Environment submitted this well-researched proposal that we ask you to support for the following reasons:

- **Hundreds of bears have been killed over the past three years after being caught in a snare,** including black bears, brown bears, sows and sows with cubs in this ADF&G "experiment".
- This indiscriminate and cruel practice is spreading throughout the state, and **if the BOG approves this, anyone will be able to apply for a permit to snare bears.**
- A recent scientific report shows **independent scientists are concerned that Alaska is headed down the same path** as every other state which once boasted healthy bear populations.

Eileen Bosch
12772 Saratoga-Sunnyvale Rd.
Saratoga, CA. 95070

