

**Alaska Board of Game  
On-Time Public Comment Index  
Interior Region Meeting February 14-23, 2014**

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January 30, 2014

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

To Whomever:

Attached are Ahtna Tene Nene' Customary & Traditional Use Committee's comments on the Interior Region proposals for the Interior Region meeting February 14-23, 2014 in Fairbanks, Alaska.

Please forward them to members of the Alaska Board of Game.

Sincerely,

*Bloria Stuckwan  
for Roy S Ewan*

Roy S. Ewan,  
Chair



## Alaska Board of Game Interior Region Wildlife Proposals

Proposal 51 – 5 AAC 85. 060. Hunting season and bag limits for animals. By Smoky Don Duncan. Lengthen the wolf season in Units 12, 19, 20, 21, 24, and 25 as follows:

Wolf season: August 5 – June 15.

### Comments:

We oppose lengthening wolf season in Units 12 and Unit 20 from August 5 to June 15 to give hunters more opportunity to harvest wolves. The current dates from Aug. 10-May 31 gives more than sufficient opportune time to hunt for wolves to reduce the wolf population. Wolves with pups may be inadvertently killed, pups will be left orphans. It should be noted that wolves prey upon weak and sick populations and take them out of the population of moose and caribou.

Proposal 52 - 5 AAC 92.015(a)(4). Brown bear tag fee exemptions. By Alaska Dept. of Fish & Game. Reauthorize resident grizzly bear tag fee exemptions throughout Interior and Eastern Arctic Alaska as follows:

### Comments:

We support Proposal 52 to reauthorize resident grizzly bear tag fee exemption throughout Interior Region. Tag fee requirement will discourage hunters from hunting grizzly bears. Grizzly bear population is prevalent. Harvesting of grizzlies will aide in increasing moose calves survival.

Proposal 54 - 5 AAC 92.051. Discretionary trapping permit conditions and procedures. By Fairbanks and Delta Fish and Game Advisory Committees. Allow the Department of Fish and Game to issue permits in the Interior Region for trapping bears under their discretional authority as follows: (We are asking the board to approve, that department could issue permits for the trapping of (foot hold snares) of bears at their discretion and in compliance in 5 AAC 92.051.

### Comments:

No comments, there is no black bear trapping seasons.

Proposal 55 - 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions. By Alaska Wildlife Alliance. Prohibit the use of snares to take bears in the Interior Region as follows:

5 AAC 92. 095

(20) The taking of a bear by trap or snares

### Comments:

There is no trapping seasons for black bears.



Proposal 56 - 5 AAC 92.220. Salvage of game meat, furs, and hides. By Joel Doner. Remove the salvage requirements for brown bear meat at bait stations in the Interior Region as follows: Repeal the meat salvage requirement for brown bear over bait in the Interior Region.

Comments:

We support Proposal 56. Salvage requirement for black bear meat is required from January 1 to May 31. Regulations for salvage requirements similar to black bears should be in place for brown bear meat at bait stations. From June 1 to December 31, salvage of brown bear meat should not be required. Depending upon the time of year, meat may be not tasty for humans to eat. Some people do not eat brown bear meat at these times of the year. Bear meat left in the field should be covered with dirt and debris, not left in the field to rot.

Proposal 57 - 5 AAC 92.220. Salvage of game meat, furs, and hides. By Smokey Don Duncan. Remove the salvage requirement for brown bear meat taken at bait stations in Units 12, 20C, 20E, and 22D as follows:

For brown bears taken over bait stations in Units 12, 20C, 20E and 22D the edible meat **does not need to be salvaged.**

Comments:

See comments under Proposal 56.

Proposal 83 - 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures. By Mike Cronk. Limit guides to two black bear bait stands in Units 12 and 20E as follows: In Units 12 and 20E, guides may only register up to two bait stands per guide.

Comments:

We support Proposal 83 to limit guides up to two bait stands per year. The land mass in Unit 12 does not hold much State lands for local baiters and guides to hold bait stations without potential conflicts. Guides are allowed up to 10 bait stations while local baiters are allowed two bait stations. Limiting guides up to two bait stations will encourage more local to establish bait stations.

Proposal 84 - 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures. By Upper Tanana/Fortymile Fish and Game Advisory Committee. Allow the use of game meat at bait stations in Units 12 and 20E as follows:

- Allow the Department of Fish and Game (department) to issue permits to take bears at bait stations with the use of game, furnished by the state, as bait in Units 12 and 20E. This is the same wording used under 5 AAC 92.040 for issuing permits for use of game for trapping.

Comments:

We oppose Proposal 84 to all the use of inedible game meat at bait stations in Unit 12. The Department cannot furnish inedible road-killed moose and caribou meat to every person. It would be hard for enforcement to know whether the meat came from road kill or is/was caribou and moose meat that was inedible. Abuse of the regulations will occur; baiters will be using



meat that is not furnished from ADF&G office to bait bears with. Bait for a bear station will require a good chunk of meat that will be wasted.

What is inedible to one person may be edible to another person. Soup can be made out of meat and bones that are perceived to be inedible.

Proposal 85 – 5 AAC 85.025. Hunting seasons and bag limits for caribou. By Upper Tanana Fortymile Fish & Game Advisory Committee. Establish a Tier I registration permit for Nelchina caribou in Unit 12 as follows:

Hunt area: Unit 12 excluding that portion within Wrangell-St. Elias National Park and Preserve.

Season: October 21-March 31; season should be open only for Alaskan residents only

Bag Limit: One caribou.

Hunt Conditions: Hunters will be restricted to taking caribou in Unit 12 only, unless the hunt is cancelled.

Harvest Quota: The harvest quota for Unit 12 should be managed within the annual Nelchina Herd quota.

Comments:

We oppose Proposal 85 to establish a Tier I registration permit for Nelchina caribou in Unit 12. A community subsistence hunt is already an established hunt in portions of Unit 12. Subsistence hunters have an opportunity to sign up under a group under the community subsistence hunt to harvest a caribou.

The community subsistence hunt and Tier I in Unit 13 is closed by emergency order before the season closes due to over harvest of the Nelchina Caribou in Unit 13. Adding another hunt will only add more pressure to the Nelchina Caribou herd subsistence hunts.

Proposal 86 – 5 AAC 85.045. Hunting seasons and bag limits for moose. By Upper Tanana/Fortymile Advisory Committee. Modify the bag limit for resident moose hunters in a portion of Units 12 and 20D as follows:

South of the confluence of the west fork and the mainstem of the Robertson River change the resident bag limit to one bull with spike-fork or 50-inch antlers, or antlers with four or more brow tines on at least one side.

Comments:

We oppose Proposal 86 to modify the bag limit for resident moose hunters in a portion of Unit 12 to change it to one bull with spike-fork or 50-inch antlers, or antlers with four or more brow tines on at least one side. Moose populations within the hunt area is stable, a restricted moose hunt isn't necessary.

Regulatory change to a more restrictive antler size will only add hunting pressure to other road accessible hunting areas. Hunters will move to areas that don't have moose antler restrictions.



Proposal 89 - 5 AAC 92.113. Intensive Management Plans I. By Ahtna Tene Nene' Customary and Traditional Use Committee. Establish a wolf-control program in Unit 12 as follows:  
Establish an aerial or land and shoot wolf control program in Unit 12 on state lands so the moose population will increase in Unit 12.

Comments:

We support Proposal 89 to establish a wolf control program in Unit 12. The moose population may be at a stable population now, however, it may fall below population objectives due to snow level depth and a harsh winter. Predators such as wolves and bears may also decrease the moose population. Establishing an area within Unit 12 to do a land and shoot should be implemented by the Alaska Board of Game to keep the moose population sustainable.

Proposal 97 - 5 AAC 85.045(a)(18). Hunting and bag limits for moose. By Alaska Department of Fish & Game. Reauthorize the antlerless moose season in Unit 20A.

Comments:

We oppose Proposal 97. We will continue to oppose antlerless moose hunting season and bag limits proposals. Ahtna People are against killing a cow moose, especially one with a calf. Calves may be left orphans, if the maternal cow were shot accidentally. It could be difficult to tell if a cow is by itself, the calf may be lying down or standing a few yards away from its mother. In the 1970s, an antlerless moose hunt was held and the moose population declined and took years to recover. It is taboo to kill a moose with a young calf; calves were preserved so that they could grow to adulthood. Preserving cows with calves was one of Ahtna's moose traditional management.

Proposal 98 - 5 AAC 85.045 Hunting seasons and bag limits for moose. By Jeff Barney. Change the bag limit of moose in Unit 20A to any bull as follows:

All Unit 20A, any bull, no restrictions. The Department of Fish and Game can regulate close to road or certain areas length due to the harvest if too many bulls are taken.

Comments:

We oppose Proposal 98 to change Unit 20A to any bull, no restrictions. Unit 20A land mass area is on a portion of Ahtna Inc. lands, and trespass continues to occur. Ahtna Inc. has major concerns with trespass on its lands.

And any Bull Moose hunting season in Unit 20A will help to alleviate hunting pressure in Unit 13, if it were adopted by the Board of Game. There are many regulated moose hunted in this area, adding one more moose hunt and the moose population seems to be stable.

Proposal 99 – 5 AAC 92.540(3)(F). Controlled Use Areas by Robert Caywood. Remove the Wood River Controlled Use Area as follows:

Eliminate the Wood River Control Use Area.

Comments:



We oppose Proposal 99 to remove the Wood River Control Use Areas to eliminate it. Hunting pressure will continue to occur, if Wood River Control Use area is eliminated, in fact, it will increase, if motorized vehicles were allowed in this area. Changes to the boundaries will also not aid in reduction of hunting pressure. Ahtna Inc. lands continue to be trespassed and increase if changes to eliminate Wood River Control Use Areas were made.

Proposal 100 – 5 AAC 92.540(3)(F). Controlled Use Areas by Robert Caywood. Modify the boundaries of the Wood River Control Area as follows:  
Move the boundary for the Wood River Control Use Area (WRCUA) back to the west bank as it previously was.

Comments:

See comments under Proposal 99.

Proposal 101- 5 AAC 85.045(a) (18). Hunting seasons and bag limits for moose. By the Alaska Department of Fish & Game. Create target moose hunts in Unit 20A and Unit 20B as follows:

Comments:

We support Proposal 101 with an amendment to create target moose hunts in only Unit 20 A and B. Many moose are being killed unnecessarily by vehicles. Vehicle accidents occur because of moose encounters, and people's lives are in jeopardy. A target hunt could be set up to select random hunters from an applicant pool to harvest a moose. This would resolve moose population and create a moose hunting opportunity.

Proposal 102 - 5 AAC 85.045. Hunting seasons and bag limits for moose. By Mark Albert. Allow in the taking of any bull in Unit 20A and portions of Unit 20B by utilizing two harvest tickets as follows:

In Unit 20A and the antler restricted portions of Unit 20B, allow the taking of any bull by utilizing two valid harvest tickets. Both holders of the tickets must be present in the field and the harvest tickets would have to accompany the animal to be the point of processing. Harvest reports would be required to list both ticket numbers for the single animal taken.

Comments:

We oppose Proposal 102. Proxy hunting could be done, if someone does not want to hunt. This proposal is confusing. Using two harvest tickets, while both are in the field doesn't make sense. Harvesting One Bull or Any Bull with a harvest ticket is already allowed in Unit 20B. Changing Unit 20A to an Any Bull utilizing a harvest ticket could be changed in the regulations, so that two valid harvest tickets could be utilized.

Proposal 103 – 5 AAC 92.011. Taking of game by proxy. By Fairbanks Fish and Game Advisory Committee. Limit proxy hunting for moose in Units 20A and 20B as follows:

**(4) more than once per regulatory year for moose in Units 20A and 20B.**



We support Proposal 103 to limit use of proxy to no more than once per regulatory year for moose in Units 20A and 20B. There is an over-crowding hunting issue within these units and over harvesting of moose by some hunters. Limiting proxy to one moose per regulatory year will help to eliminate abuse of over harvest of moose and maybe over-crowding of hunters in the two subunits.

Proposal 104 – 5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures. By Fairbanks Fish and Game Advisory Committee. Allow harvest of brown bears at registered black bear baits sites in Units 20A and 20B.

Comments:

We support Proposal 104 to allow harvest of brown bears at registered black bear bait sites in Units 20A and 20B. Brown bears will seek out black bear bait stations to seek food and will be caught incidentally in black bear bait stations. It makes sense to be able to harvest brown bear over black bear bait stations. Brown bear populations are healthy, there isn't a conservation concern.

Proposal 105 - 5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures. By Lee Olson

Comments:

See comments under Proposal 104.

Proposal 115 – 5 AAC 85.045. Hunting seasons and bag limits for moose. By Smokey Don Duncan. Change the season dates for moose in Units 20C as follows:

Unit 20C:

Resident moose season, spike-fork or 50-inch antlers or three brow tines, September 1-25.  
Nonresident moose season, September 1-25 one bull with 50-inch antlers or antlers with four brow tines, on at least one side.

Comments:

We support Proposal 115 to restrict moose hunt season in Unit 20C. It may not be necessary to restrict moose hunting season in this subunit, however, Ahtna lands are in this area and trespass will occur on Ahtna lands.

Proposal 116 – 5 AAC 92.540. Controlled use areas. By Adam Lammners. Create Nenana-Totchaket Resource Development Corridor Controlled Use Area in Unit 20C as follows:

**Unit 20C Nenana-Totchaket Resource Development Corridor Controlled use Area;**  
**(i) consists of the portion of Unit 20C along the Nenana-Totchaket Resource Development Corridor, and any extensions to this corridor made accessible by new road completion, and within two miles of the road.**

Comments:



We oppose Proposal 116 to add Nenana-Totchaet Resource Development Corridor Controlled Use Area in Unit 20C. Ahtna Inc. owns lands within Unit 20C, trespass will occur on its lands. Ahtna has concerns with trespass of its lands.

We oppose adding another control use area to Unit 20, there are more than enough controlled use areas in Unit 20. Hunting pressure won't be alleviated by adding another CUA.

Proposal 117 – 5 AAC 92.540. Controlled use areas. By Minto Nenana Fish and Game Advisory Committee. Reinstate the Nenana Controlled Use Area as follows:

Comments.

See comments under Proposal 116.

Proposal 122 – 5 AAC 92.015. Brown bear tag fee exemption. By Alaska Department of Fish and Game. Reauthorize the brown bear tag fee exemption for Region IV (Central/Southwest) as follows:

Comments:

We support Proposal 122 to reauthorizing the brown bear tag fee exemption for Region IV. Hunters will be discouraged from attempting to hunt for brown bears, if they have to purchase a \$25 tag fee to hunt for brown bear in Region IV. The Board of Game should encourage harvest of brown bears in promoting liberal regulations of brown and black hunting and harvesting of them.

Proposal 127 – 5 AAC 85. 045(11). Hunting seasons and bag limits for moose. By the Alaska Department of Fish and Game. Reauthorize the drawing permit hunts for antlerless moose in Unit 13 as follows:

Comments:

See comments under Proposal 97.





Submitted By  
Thor Stacey  
Submitted On  
1/31/2014 4:03:46 PM  
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Dear Alaska Board of Game Members,

Please find the following comments regarding proposals you will be considering during the February board meeting in Fairbanks. The Alaska Professional Hunters Association Inc. (APHA) is opposed to attempts to change non-resident allocation formulas established in Board Policy (2007-173-BOG). APHA members rely on fair and predictable allocation to non-resident hunters based on defensible biological parameters that are inline with the principles of sustained yield and result in a maximum benefit of ALL users. The APHA maintains its support of the Board's current allocative policies and believes that the well defined, species specific, resident preferences are in the best interests of all Alaskans.

The APHA is in strong support of the Board and Department's efforts to form a sheep-working group. We feel strongly that this group should incorporate voices from stakeholders across the state. To this effect, we request that hunting guides are considered "stakeholders" and that persons responsible for the formation and implementation of this group are provided information to this effect. We maintain our participation in this group is historically justified and that our knowledgeable perspective will be essential to its ultimate success. We see the goal of the working group as:

*to have a robust discussion, in a think-tank format, that presents current understandings of sheep biology and sheep harvest information (Alaska) to a group of diverse, knowledgeable Alaskan stakeholders who incorporate their perspectives in the drafting of a statewide sheep management plan that relies on a set of pre-determined, agreed upon, management tools the Board of Game shall adopt to achieve the goals and objectives the group sets for a sustainable future for Alaska sheep hunting.*

We strongly suggest that the *management tools* include not only "stop-gap" measures to conserve the resource but, given abundance, opportunity liberalizations as well. Alaska's final sheep management plan should be made easily available to the public and then allowed to run its course for 10 years before it is revisited. Our 10-year recommendation is based on recognition of the need for biological and social compromise. First, we considered the cyclical nature of Alaska's game populations and our northern latitude that can retard the effects of management changes (up to 20+ years). It is quite probable that ten years will be an insufficient timeline to measure the full biological effects, on a statewide basis, of a new management strategy. Second, we believe that given Alaska's current rate of population growth and the short average length of residency, 10-years will be about as long as the public will understand and accept the working group's results. We feel that the 10-year goal is a good compromise that allows for public re-appraisal while giving new management practices some time to run their course. The recent reappraisal and subsequent validation of the Unit 4 Brown Bear Management Plan (January 2013, Sitka BOG meeting) is an excellent example of the net positive effects this type of working group can have for the resource and the surrounding social climate. The Sheep working group is a timely project and has our strong support.

As you consider our positions we urge you to keep in mind that Alaska's professional guide industry represents a significant and important economy in rural Alaska. In addition to the "new dollars" the guide industry brings to rural Alaska and the private sector at large, our client's tag and license purchases directly and indirectly, through matching Federal funds, provide the "lion's share" of ADF&G's funding. The health of our industry is dependent upon prudent stewardship and conservation of Alaska's wildlife as well as fair allocation. It is precisely because of our stewardship principles and respect for all users and a fair allocation process that our members maintain deep community ties across our vast State. Alaska's professional hunters ask that when you consider the below comments you remain mindful that it is in our best interest to have abundant game as well as a healthy, inclusive social situation that is in the best interests of ALL Alaskans.

### **Individual Proposal Comment**

Below you will find our comments on individual proposals under your consideration for Region III. Leading up to the drafting of these



comments the APHA held a tele-conference and invited all of its members to participate in the drafting of these com conference was well attended with good representation from guides who conduct hunts in Region III. You will find that proposals that we don't have comments listed for. These were proposals that we felt did not directly impact guides o the groups purview. We also chose, in a couple of instances, to group similar proposals together and combine our recommendations (example, wolverine hunting season proposals). While these comments represent the voice of our group, you will undoubtedly get comments from APHA members who want their individual positions considered as well. Because the APHA takes a statewide perspective when approaching Board proposals, we urge you to consider regional expertise from our members even when their position is different from that of the APHA. Finally, we thank you for your consideration and urge you to reach out to our membership for clarity and details on proposals before you, either on a unit-by-unit or regional basis. Given the opportunity, Alaska's hunting guides will continue to bring a wealth of wildlife and hunting knowledge and experience to table.

## Region III Sheep Proposals

The APHA remains solution oriented regarding the recent slew of "sheep re-allocation/resident first proposals" but believes that the best solution will come from compromises that put all the users groups at the same table with the same objective information. We ask that the board to reject ALL SHEEP PROPOSALS PENDING THE RESULTS OF THE SHEEP WORKING GROUP. Furthermore, during the past 7 years the APHA has been actively fulfilling its commitment to the Board to advocate for a guide concession program on State Lands that will significantly reduce conflicts over game resources in Alaska. **While the Guide Concession Program is in its final round of debate in the legislature before being implemented, it is more appropriate that the results of the sheep-working group be applied in conjunction with guide area implementation.** Furthermore, because areas with and without guiding concessions have vastly different intensities of conflict over sheep, these substantive findings can and will be addressed in the working groups' recommendations' even if guide areas are not implemented. **In a scenario where Guide Concessions are implemented behind schedule the recommendations of the working group can be seamlessly be applied in to management strategies in this "delayed" or "tiered" implementation scenario.** We feel this is appropriate because sheep conservation is not an issue, trophy quality and other subjective hunt qualities and values are. We feel that the working group format is the best possible forum for airing, expressing and solving this list of grievances currently being alleged between user groups.

We urge you to move the working group ahead rapidly, in the interest of ALL Alaskan sheep hunters and, potentially, the resource itself!

## Proposals 39, 40, 41, 42, 43, 45, 46, 47, 48, 49- OPPOSE

We oppose all of the above proposals that seek to restrict non-resident sheep hunters. These proposals lack a conservation perspective and are strictly allocative in nature.

## Proposal 44- OPPOSE

The Alaska Backcountry Hunters (AKBH) suggest that areas without guide concessions require non-resident draw to get to an acceptable allocation and success rate for resident hunters. We have chosen to address Proposal 44 independent of the other Region III sheep proposals because it highlights a conservation concern (the hypothesis that not all of the mature rams can be harvested from the population each year) while, at the same time, providing data to support the positive value of Guide Concessions from a resident-allocation perspective.

We **OPPOSE** this proposal because the justification for this change to non-resident allocation is overly simplified and because drawing hunts, in units without guide concessions, destroy business viability. For clarity: it is impossible for a guide to plan or run a guide business when he does not know what kind or how many hunts he has the opportunity to sell. Random drawing hunts destabilize and cripple responsible, ethical guides from offering sustainable hunting opportunities. However, defined limitations on non-resident hunters are not necessarily damaging where a guide has a concession, for a finite duration (say 10 years), with a predictable number and type of hunts to offer and capitalize on. Alaska's guide businesses are almost wholly Alaskan owned and operated. Random draw hunts have allowed technology savvy entities to "stuff the box" and effectively control how Alaska's game resource is marketed and who benefits from it. While "guide client agreements" help preserve Alaska resident guides' inherent quality advantages, they are insufficient, in themselves, to prevent sophisticated drawing application services from controlling and effectively owning the resource. **Simply put; the APHA cannot**



While we agree with AKBHA's that guide concessions are absolutely positive for resident hunters and will benefit the resource, we disagree that non-resident sheep draws are the "silver bullet" to fix sheep hunting without concessions. We would caution the Board that AKBHA's support for repealing this proposal, once guide concession are implemented, could be dis-ingenuous due their opposition of the Guide Concession Bill in the legislature. We would encourage the AKBHA to bring this data, showing the positive effects of guide concessions on resident hunting opportunity, to the legislature in support of the Guide Concession Bill. We would also encourage AKBHA to assert itself as a "stakeholder" and for the Department to include them in the sheep working group membership.

**We recognize that this proposal raises a conservation question (hypothesis) and that it is not strictly allocative in nature but we disagree that the proposed solution will get the most desirable results for Alaskans.**

### **Proposal 51- SUPPORT**

Support based on the given merits.

### **Proposal 59- SUPPORT**

We support this proposal because it provides for higher quality, longer hunts for guided clients without causing conservation or allocation concern. A few hunters will benefit, without costing the resource or other users.

### **Proposal 60- SUPPORT**

We support this proposal based on the department's comments. Increasing accuracy of harvest reporting and hunting effort will prevent future conservation concerns.

### **Proposal 61- SUPPORT**

Since this proposal increases guided hunter opportunity, without increasing harvest or causing a conservation concern, we support it.

### **Proposal - 62 & 63 SUPPORT**

We support these proposal based on our members observations of predator numbers and densities. We agree with the department's comments.

### **Proposal – 65 OPPOSE**

We oppose this proposal because sheep are less desirable to consume, while confined to critical habitat in the winter months. We believe that proxy hunting could result in harvest way beyond the C&T for the unit. Hunting sheep in the winter will result in higher harvest with a high likelihood of harassment and unnecessary stress on the animals.

**Proposal 68- OPPOSE**

We oppose this proposal because we don't want to compromise the working groups management plan, outside of that process, with an individual proposal.

**Proposal 69- Conditional SUPPORT**

We support the concept of this proposal and what it is trying to accomplish; fully utilized drawing tags with emergency transfer provisions. Drawing hunts are very problematic for guides in general and special measures, such as what is suggested in this proposal, are need to maintain economic viability within a drawing hunt management scheme. Once good example of the types of special considerations that guides need stay viable when a hunt goes to draw is "guide client agreements." The regulation requires that both the guide and client understand their mutual commitments once the tag is drawn and prevents wasted or unused tags. However, what happens when a client has to cancel due to a family emergency and has not paid for the balance of the hunt? APHA members have long term, well run businesses that are viable because they have good/excellent reputations. In these situations, the guide generally takes a loss and the tag goes unused. We support a mechanism for **emergency** transfer of tags to another client in the case of family or medical emergencies.

**Proposal 81- SUPPORT**

Move statewide.

**Proposal 99 & 100- OPPOSE**

We strongly oppose any changes to the Wood River Controlled Use Area (WRCUA). The north side of the Alaska Range is one of the most productive game ranges in the State with diversities of opportunity and species nearly unparallel in State. This biological wealth is also close to the second largest city in Alaska with a very active hunting tradition. By creating the WRCUA, Fair Chase Alaska hunting guides have been able rely on pack animals and backpacks to provide unique wilderness experiences. These businesses have built reputations based on these experiences that will become meaningless and outdated should the WRCUA be changed. We strongly oppose proposals **99 & 100** because the CUA status of this area maximizes opportunity while not unfairly disadvantaging residents and guides who choose to use traditional, non-mechanized modes of travel to hunt and enjoy this rich, easily accessible area. If the integrity of the CUA is compromised it will come at the expense of hunting opportunity.

**Proposal 107- SUPPORT**

We **strongly support** this proposal based on its given merits and the department's statements that this will not cause a conservation concern.

Sincerely,

Thor Stacey



# Alaska Trappers Association

## PO Box 82177

### Fairbanks, AK 99708

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

Dear Chairman & Members of the Board

On behalf of the more than 900 members of the Alaska Trappers Association, We wish to share our opinions on several proposals which you will be considering during your February, 14 meeting in Fairbanks.

Proposal #54 – The Board of game has demonstrated leadership in the use of snares for black bears. We defer to their judgment.

Proposal #55 – We would like to point out that the USFWS uses foot snares foe capturing bears. If it is acceptable for the USFWS to use snares to capture bears, it should be acceptable for the citizens of the state as well.

Proposal #64 – The ATA supports the alignment of trapping season dates. We defer to the judgment of the board of game regarding specific opening and closing dates.

Proposal #73 – The ATA supports the alignment of trapping dates. We defer to the judgment of the board of game regarding specific opening and closing dates.

Sincerely,

Joe Letarte  
President ATA

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**THE ALASKA WILDLIFE ALLIANCE**  
"LETTING NATURE RUN WILD"



PC004 1 of 8

January 31, 2014

ATTN: 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

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 **Interior Region** regulations, February 14-23, 2014 in Fairbanks.

**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,

A handwritten signature in cursive script that reads "Connie Brandel".

Connie Brandel  
Office Manager



## **Alaska Wildlife Alliance's Comments on Proposals to the Alaska Board of Game**

### **Interior Region meeting February 2014**

**PROPOSAL 55:** We **SUPPORT** this proposal and urge the BOG to accept it.

This proposal would prohibit the snaring of bears in the Interior Region.

The Alaska Department of Fish and Game and the Board of Game have significantly liberalized regulations for the killing of predators in recent years. State regulations and policies now allow snaring of brown and black bears, baiting of brown bears, killing sows with cubs and cubs, year-round seasons, unlimited bag limits, and killing animals in their dens. In conjunction with these changes, the Board of Game has also reauthorized land-and-shoot hunting, and has vastly expanded predator control areas. All of this has been done with little or no scientific or social justification.

In addition to giving the state of Alaska's wildlife management a black eye, bear snaring presents public safety issues, fair chase issues, biological issues, economic issues, and law enforcement issues. Bear snaring is an indiscriminate and inhumane method of take. Bear snaring has the potential to take two generations at once when a sow with cubs is snared; this is especially egregious given bears' slow reproductive rate. Bear snaring is overwhelmingly opposed by Alaskans and others.

- Scientists overwhelmingly agree that bear snaring is indiscriminate, cruel and not biologically sustainable.
- Bear snaring is an extremely controversial method of killing animals. The BOG tarnishes Alaska's image for residents and non-residents alike by insisting on continuing its war on predators. Bear snaring has never been allowed in Alaska since statehood until the BOG approved an experimental program in 2008.
- Because bear snaring is indiscriminate, females with dependent cubs and cubs themselves are at risk. Bears have one of the lowest reproductive rates and it is for this reason modern scientific management principles discourage the harvest of females.
- There are the dangers to other users who may come upon a situation where one bear is caught while its siblings or mother remain free in the area, creating the very real possibility of severe injuries or fatalities. The baited traps also create food-conditioned bears, and animals which learn to associate food with humans are a danger to our communities.



- Bears have cultural, economic and biological importance to Alaskans. Bear snaring is archaic, cruel and should be banned.
- Living bears have a very high value as a tourism draw and a source of revenue. They are almost always cited as one of the "big three" species visitors come to Alaska to see.

As shown by the negative reactions to the 2010 decision to list bears as furbearers, the majority of visitors and of Alaskans in all user groups oppose bear snaring. A small sampling of those who have spoken out in opposition of bear snaring includes President of the Safari Club International's Alaska Chapter Terry Holliday, master guide and executive director of the Alaska Professional Hunters Association Robert Fithian; bear hunter and big game hunting guide Karl Braendel; Native leaders Maxine Franklin and Roy and Charlene Huhndorf; 77 current or former wildlife scientists (representing about 1,600 years of involvement with Alaska's wildlife) who sent a letter to the Board of Game opposing bear snaring; former ADF&G scientists Sterling Miller, John Schoen, and Rick Sinnott; Alaskan conservation groups such as Alaska Center for the Environment (ACE) and the Alaska Wildlife Alliance (AWA); national conservation groups such as the Sierra Club.

**PROPOSAL 62:** We **OPPOSE** this proposal and urge the BOG to reject it.

This proposal would reauthorize the Intensive Management predator control program for Unit 19(A) to increase the moose population for hunters.

The use of lethal methods for intensive management predator control where state employees, contractors or the public kill wolves by hunting down packs with aircraft or snowmachines, or baiting or snaring bears, is a violation of the current standards of animal treatment in the United States: simply, it is wrong. It is wrong to inflict terror, pain, and punishment on animals which are doing what they have been doing for millions of years to do to survive.

We do not oppose predator control if it is proven as necessary to protect the ecosystem from potentially destructive risks, but those actions should be scientifically justifiable and fit other criteria we note below. Any such predator control measures implemented must be humane and within the scope of a more holistic wildlife management scheme.

In medicine and public health each proposal for research or for an intervention program that involves human or animal subjects must pass a review by a Human and Animal Subjects Institutional Review Board. If that Board gives its OK, it means that the science and ethics are of the highest quality and warrant using human and animal subjects which may have to endure discomfort or pain. It seems that the science and the proposed interventions for wildlife management also should require a review by a board of scientists and ethicists whose members have no financial, political, or career interests in the outcome.



We believe the science which is used to implement the proposed intensive management predator control interventions is flawed and incomplete. Not enough data are collected to track changes in space and time to be able to make good decisions. The proposals of the Alaska Department of Fish and Game (ADF&G) do not present data, analyses, or citations for their own studies, or support or dissent from the scientific work of others. Those are the elements required for proposals in other fields which involve ethical, scientific or financial issues.

For an intervention that is costly and potentially harmful to the ecosystem, the science should be independently peer reviewed. Likely there are differing opinions within ADF&G. The public is paying the dissenters salaries as well, and we would like to hear from them. This is done in courts of law; it is done in the legislature. Why not in wildlife management?

This proposal also does not contain an estimate or accounting for costs or discuss cost effectiveness. In each proposal there should be a complete disclosure of all the costs that will be borne by the state. The use and cost of aircraft and all vehicles, fuel, staff salary and benefits, insurance and bonds, contractors, equipment, and other overhead should be a detailed part of the proposal. In the end the question is: How much does it cost to add one more moose to the population to be harvested? And that answer should be balanced for the benefit to all Alaskan citizens, not just a few.

The proposal contains no discussion of risk management. What happens if there is a crash in any of the predator or prey populations? What are the likely unintended consequences? What is the possible collateral damage to the environment and to all the stakeholders? The proposals do not address these concerns.

In the longer term there may be untoward economic costs. Not many people are seeing wolves in Denali National Park these days, and bear viewing on the Kenai is not what it used to be. There needs to be a thorough study of the costs and tradeoffs of intensive management predator control. Most tourists come to Alaska to see animals in our unmatched beautiful terrain. Alaska's reputation for caring for our animals is bad enough as it is. When the animals are so scarce that the odds of seeing one in a stay spanning a few days is near zero, we can anticipate that our reputation for wildlife destruction will be confirmed.

Another element that is missing is consideration for all the stakeholders in Alaska's wildlife. The wildlife in Alaska belongs to all Alaskans and in fact to all the citizens of the U.S. Hunters are the smallest population of "users" of wildlife but may be costing the public the most to accommodate. Other stakeholders are proverbially all the others who "leave only footprints and take only pictures." Those Alaskan folks and the hundreds of thousands of tourists leave a lot of money in the coffers of Alaskan businesses.

Concern should as always remain high for subsistence and Native Alaskan hunters. Other stakeholders include the other animals and plants in the ecosystem. Killing off as



many wolves and bears as possible is using a sledgehammer to manage an ecosystem that is controlled by many factors we have not adequately measured and others we know nothing about. What about the other species in the ecosystem?

There is another growing influence that the ADF&G and BOG should consider. Although the ADF&G and the State produced plans about four years ago to deal with climate change, it appears that actual implementation of anything useful or follow-through is dead. For Alaska and northern areas around the world, climate change is happening now. The impact on animal (and plant) populations will be significant if not horrific. Habitats will be turned upside down. We are looking at the extinction of species from the megafauna down to diatoms and algae which are both keystones of our ecosystem. Clearly this should influence wildlife management policy.

Finally, it is time for the wolf and bear wars between Alaska, the federal government, environmental activists and Alaskan citizens to end. The Denali buffer zone and the conflict over bear killing by the state on the Kenai are just recent examples. The ecosystem does not know where the boundaries of jurisdiction are. Data and surveillance of any of the measures needed for wildlife management are woefully inadequate.

We respectfully request that the BOG reject this proposal and insist that the ADF&G and BOG take it upon themselves to reform their predator control procedures. In the future, such proposals should adhere to established ethical principles; enhance the quality of the science; provide cost information and a study and plan for risk management; include all stakeholders; pay close attention to possible economic impacts; give climate change factors a high priority; and seek to build more trusting relationships with the federal government.

**PROPOSAL 63:** We OPPOSE this proposal and urge the BOG to reject it.

This proposal would reauthorize the Intensive Management predator control program for Unit 19(D)-East to increase the moose population for hunters.

The use of lethal methods for intensive management predator control where state employees, contractors or the public kill wolves by hunting down packs with aircraft or snowmachines, or baiting or snaring bears, is a violation of the current standards of animal treatment in the United States: simply, it is wrong. It is wrong to inflict terror, pain, and punishment on animals which are doing what they have been doing for millions of years to do to survive.

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For an intervention that is costly and potentially harmful to the ecosystem, the science should be independently peer reviewed. Likely there are differing opinions within ADF&G. The public is paying the dissenters salaries as well, and we would like to hear from them. This is done in courts of law; it is done in the legislature. Why not in wildlife management?

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The proposal contains no discussion of risk management. What happens if there is a crash in any of the predator or prey populations? What are the likely unintended consequences? What is the possible collateral damage to the environment and to all the stakeholders? The proposals do not address these concerns.

In the longer term there may be untoward economic costs. Not many people are seeing wolves in Denali National Park these days, and bear viewing on the Kenai is not what it used to be. There needs to be a thorough study of the costs and tradeoffs of intensive management predator control. Most tourists come to Alaska to see animals in our unmatched beautiful terrain. Alaska's reputation for caring for our animals is bad enough as it is. When the animals are so scarce that the odds of seeing one in a stay spanning a few days is near zero, we can anticipate that our reputation for wildlife destruction will be confirmed.



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Concern should as always remain high for subsistence and Native Alaskan hunters. Other stakeholders include the other animals and plants in the ecosystem. Killing off as many wolves and bears as possible is using a sledgehammer to manage an ecosystem that is controlled by many factors we have not adequately measured and others we know nothing about. What about the other species in the ecosystem?

There is another growing influence that the ADF&G and BOG should consider. Although the ADF&G and the State produced plans about four years ago to deal with climate change, it appears that actual implementation of anything useful or follow-through is dead. For Alaska and northern areas around the world, climate change is happening now. The impact on animal (and plant) populations will be significant if not horrific. Habitats will be turned upside down. We are looking at the extinction of species from the megafauna down to diatoms and algae which are both keystones of our ecosystem. Clearly this should influence wildlife management policy.

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We respectfully request that the BOG reject this proposal and insist that the ADF&G and BOG take it upon themselves to reform their predator control procedures. In the future, such proposals should adhere to established ethical principles; enhance the quality of the science; provide cost information and a study and plan for risk management; include all stakeholders; pay close attention to possible economic impacts; give climate change factors a high priority; and seek to build more trusting relationships with the federal government.

**PROPOSAL 89:** We **OPPOSE** this proposal and urge the BOG to reject it.

This proposal would establish an aerial or land and shoot wolf control program in Unit 12 in order to increase the moose population.



This proposal clearly states that the moose population in Unit 12 is currently at a stable population, and no scientific data is provided to support the implementation of predator control.

To implement predator control with no scientific data supporting it - when, in fact, the moose population is stable - would be biologically and financially irresponsible - a waste of time and money. It would also be unethical and would provide fuel for yet more bad publicity for our state regarding predator control programs, particularly those involving aircraft.



Submitted By  
Charles Derrick  
Submitted On  
1/29/2014 3:34:09 PM  
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Jan. 28, 2014

Comments of Charles Derrick

Proposal 107 non-resident moose draw permits in 20B Minto Flats

Support as Amended

I am a 42 year resident of Fairbanks and have moose hunted in Minto Flats for many of those years. I and no member of my family has been or is a hunting guide or assistant. According to Fish and Game biologists, moose numbers are high in Minto Flats as born out by this late falls Minto Flats moose survey. I would support the issuance of 8 non-resident bull moose permits if season and antler restrictions are as written in the proposal (Sept. 8-25, 50" antlers or 4 brow tines on one side). Fish and Game biologists tell me that a harvest of 125-150 bulls in Minto Flats would be sustainable. In the Minto Flats Mgmt.Area including the early ANY BULL hunt (Aug. 21-27), the GENERAL HUNT (Sept. 8-25 spike/fork, 50", or 4 brow tines on one side), and the ANTLERLESS HUNT (Oct. 15-Feb. 28) in which a small number of bull calves were harvested, in each of the last 2 years there were approx. 104 bulls harvested. With a projected 125-150 sustainable bull harvest there is more harvest opportunity not being utilized. If the Board decides to issue non-resident draw permits I would like to see the bag limit regulations different for residents versus non-residents. I suggest the Game Board change the **Resident General Hunt antler restrictions** from 4 brow tines on one side to **3 brow tines on one side** . This would still leave the antler restriction in place reading spike/fork, 50", or 3 brow tines on one side. I feel this drop to a 3 brow tine restriction for **Residents** along with the 8 non-resident 50" or 4 brow tines draw permits, would raise the bull harvest closer to F&G's 125-150 without shortening the season.



January 20, 2014

From: Christopher H. Curnow

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

Dear Members of the Alaska Board of Game:

**PROPOSAL- 99 OPPOSE**

**Eliminate the Wood River Controlled Use Area**

I have been hunting and recreating in the Wood River Controlled Use Area (WRCUA) by bush plane, on foot and on horseback since 1975. I own property in the WRCUA and spend several months a year travelling through the heart of the area. The terrain is not conducive to ATV use in the August and September hunting seasons. If hunters were allowed to use ATVs, the countryside would be torn up with no way to repair once the damage is done.

Please do not change the Wood River Controlled Use Area. Thank you for the opportunity to comment.

Sincerely,

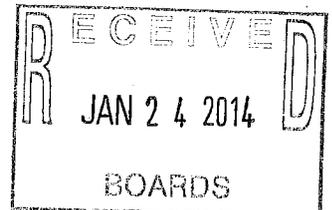
Christopher H. Curnow  
Fairbanks Resident

**PROPOSAL - 100 OPPOSE**

**Modify the Wood River Controlled Use Area**  
Same comments as above.

Sincerely,

Christopher H. Curnow  
Fairbanks





RESOLUTION # 2014-06

**A Resolution supporting Hunting Protections for the new Highway from Manley Hot Springs to Tanana in GMU 20F.**

**RESOLUTION:**

**WHEREAS**, the City of Tanana recognizes that the State of Alaska's sponsorship of construction of a proposed new road to Tanana will bring some considerable socio-economic benefits and lowered transportation costs to the community of Tanana; and

**WHEREAS**, the proposed road corridor will also have some major impacts on existing subsistence patterns and practices that currently exist within the community of Tanana, particularly with regard to subsistence hunting; and

**WHEREAS**, the residents of Tanana as represented by the ADF&G Tanana-Rampart-Manley Fish and Game Advisory Council, The Tanana Tribal Council, and the City of Tanana, are determined to take a proactive course in minimizing negative impacts on existing local Subsistence practices by considering how best to mitigate this impact on the community of Tanana;

**NOW THEREFORE BE IT RESOLVED**, that the Tanana City Council strongly supports the Tanana-Rampart-Manley Fish and Game Advisory Council's **Proposal 121**, to be considered by the Board of Game at their February 2014 meeting, which specifically creates by ADF&G Regulation, a **Controlled Use Area**, a corridor extending for two miles on either side of the new Highway between Manley Hot Springs and Tanana, between the eastern boundary of GMU 20F, and the Highway's western terminus at the Yukon River near Tanana. Within this Controlled Use Area of 20F, there is to be no hunting or retrieval of game with any use of wheeled or mechanized vehicles originating from within the designated Controlled Use Area for any resident or non-resident hunters. Creations of this Controlled Use Area is not to impinge upon existing hunting patterns inside the Controlled Use Area using boat access or snow machines, and supports continued opportunities for access on foot, so long as there is no use of motorized or wheeled vehicle originating from with that Controlled Use Area.

ADOPTED this 15<sup>th</sup> day of November 2013, at the meeting of the Tanana City Council.

Donna May Folger

Donna Folger, Mayor





Submitted By  
David Machacek  
Submitted On  
1/28/2014 2:08:52 PM  
Affiliation  
self

#43 = SUPPORT. The resident voice for a season preference on sheep hunting is increasing and should be addressed soon. It is a pretty safe bet that the majority of Alaskans support a resident preference. This proposal seems to have the least impacts on the guide industry and minimal, to no cost impacts to the State. With non-residents taking the vast majority of the sheep harvest in most GMUs, residents need an edge. Most residents are busy working in the community year around and have little time for pre-season scouting for sheep. They certainly almost never have assistants to help locate sheep. This proposal makes no change to the current non-resident season, but gives the resident an opportunity scout while sheep hunting hopefully balancing opportunity with the non-resident, who's guide likely knows what sheep they will shoot long before the season. Request the BOG give this proposal a try and should there be any financial impacts to the State, I would certainly support resident tags fees to make up any financial impacts to the State.

#55 = Oppose. Use of snares can be our only effect tool for population control. Please do not take any tools off the table.

#60 = Oppose. I totally support harvest reporting, but a 7 day requirement to report is often impossible. A reasonable reporting period is needed to cover those hunters on a 2 week trip and taking their moose on day one.

#76 = Oppose. A muzzleloader with round balls is very ineffective on big game and will likely wound more animals for the tour buses to view. This would be supportable with use of any muzzleloader with modern bullets

#92 = Support as amended. Modify bag limit for Bison in unit 20D to one per lifetime of hunter successfully taking a Bison; limit one permit per household; awarded under a party drawing permit. This will allow a few more permits to go to Alaskans who have never hunted Bison before, providing a fairer permit system. In talking and listening to residents, it seems the majority agree spreading the permits around is the way it should be. Surprisingly those against it are hunters who have previously drawn one or several permits and strongly believe they should get another permit before other Alaskans get their first!

#94 = OPPOSE. Hidden in this proposal is the elimination of two days hunters can use ATVs in the Delta Controlled Use Area, RC835, (Aug 26 & 27). Those hunters with sheep tags which open on 26th of Aug would no longer also be able to hunt caribou on the same trip. Also the distance from the highway to east of the Jarvis is too far for most hunters to reasonable be expected to carry a caribou without the use of an ATV...which also explains why there is little harvest prior to 26 August.

#95 = OPPOSE. Hidden in this proposal is the elimination of two days hunters can use ATVs in the Delta Controlled Use Area, RC835, (Aug 26 & 27). Those hunters with sheep tags which open on 26th of Aug would no longer also be able to caribou on the same trip. Also the distance from the highway to east of Jarvis is too far for most hunters to reasonable be expected to carry a caribou without the use of an ATV...which also explains why there is little harvest prior to 26 August. Although the proposed drawing for Aug 26 - Sept 10 would be very nice.

#99 & #100 OPPOSE: The WRCU is very open and accessible country, with mining trails everywhere. Removal of the travel controls during August/September would exterminate every animal in the area. ATV's & Track Vehicles could cover nearly every square mile of area leaving no moose, sheep, caribou in likely one season. The WRCU is already hunted hard with brush planes and hunters with horses, removal of the restrictions will create more hunter conflicts.

#101 Support as amended. "1 moose by targeted-hunt permit only; by muzzleloader or shotgun or bow & arrow at the Dept digression; up to 100 permits may issued". Shotguns & bow are often not very efficient on moose, adding muzzleloader would provide a short range effective option. Also only the Muzzleloader or Bow hunters would have additional training requirements, any untrained person could use a shotgun legally.

#105 SUPPORT. Grizzlies are taking over traditional black bear territory in unit 20B. I attempted a black bear bait near a popular recreation area last spring where I know there have been black bears for atleast the last 30 years. I had nothing but grizzly after grizzly at the bait site. Eventually we had to just give it up...too many grizzlies.

#109 SUPPORT. There is no biological reason to eliminate this opportunity like the Dept proposes in #110. Terrain is extremely difficult, but given the right snow condition there likely will be some harvest. I saw Bulls during the last November season and we enjoyed our time out there, but just couldn't get within muzzleloader range of the ones we saw. The risk of any over harvest are near null, it is just too challenging of an area. This could be a wide open general hunt with rifles and harvest would still be minimal. The Dept supports lengthening the season in this area of 20B under proposal #111, which is fine, but takes me back to "there being no biologic reason to take away this November.

#110 OPPOSE. No biological reason. Should the Board support this season elimination, PLEASE consider that the 2014 drawing has been done & likely hunters will know if drawn before the BOG completes this meeting. Refunding hunters \$5 really doesn't make up for the lost opportunity to apply for a different hunt. Should the Board support this action, please delay implementation until after the 2014 season.

#113 SUPPORT. Potentially this could be the best youth hunt anywhere. There must be some limited number of permits that could be given to our children to create the ultimate experience they will always remember. Not all youth can afford to be pulled out of school for a



hunt. I hear there is a Sheep Survey being developed that may shed some light on the public perception, but I do not believe it will change the fact that we need to get our youth away from TV, IPADS, IPHONES, etc, etc and get there interest in our hunting heritage.

#115 OPPOSE. Harvest is low in this area. Visibility is poor in most places, where your often lucky to get glimpse of a moose. Adding a resident antler restriction would take the moose harvest to near zero.

#121 OPPOSE. These trails have existed for decades with hunters using them, restricting their use now is unneeded and unfair for those that use the area.



REPLY TO  
ATTENTION OF

DEPARTMENT OF THE ARMY  
INSTALLATION MANAGEMENT COMMAND  
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT GREELY  
P. O. BOX 31269  
FORT GREELY, ALASKA 99731



PC009 1 of 2

July 12, 2013

IMFG-PWE-NR

MEMORANDUM FOR: THE ALASKA BOARD OF GAME

SUBJECT: Rationale for developing and submitting Proposal #91 regarding the Wounded Warrior Purple Heart hunt DM 795.

1. BACKGROUND:

The Delta Fish and Game Advisory Committee has periodically considered special big game hunts for disabled individuals over the past 25+ years. Eventually, a moose hunt (DM795) was established within the Delta Junction Management Area for Qualified Disabled Veteran's and Qualified Disabled Active-duty Military personnel having incurred a 50% or greater service-connected disability. This hunt, along with those special hunts previously proposed for disabled military individuals have met with limited public acceptance. Many retired Veterans (some disabled) and other members of the public cited abuse or questionable circumstances with which some individuals became disabled or qualified as 50% disabled. It was and currently is the desire of the Delta AC and the Public to design a hunt for those disabled personnel (veterans and active-duty military members) most deserving.

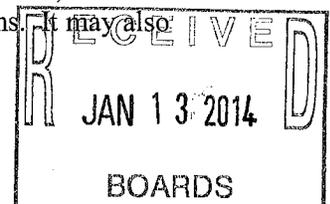
In 2012, the US Army Ft Greely Garrison renewed an interest in pursuing the creation of a special hunt for significantly disabled military personnel (veterans and active-duty). They contacted the Delta Advisory Committee, ADFG, Law enforcement, the BOG, legislators, the Governor, Alaska's delegates in the US Congress, Veterans associations, sport hunting organizations and members of the general public regarding the development of this hunt. The public support was present, if an appropriate hunt could be designed to allow those most deserving, the opportunity to participate in the hunt. Targeted hunters are often identified as "those who have given up on their ability to hunt".

In the Alaska Legislative Session of 2013, legislation was passed that declares Alaska as a Purple Heart State to honor and show respect to those who have sacrificed so much for our freedom. This declaration adds significantly to the validity (meaning and purpose) of this proposal.

US Army Ft Greely Garrison has co-sponsored this proposal. They have offered to assist the disabled hunters by permitting them to hunt in specific areas on Ft Greely and provide other logistics, if the hunters so wish. The US Army will also aid in publicly informing disabled veterans and active-duty members of this hunting opportunity.

2. PROPOSAL GOALS:

- **Simplify the regulations as much as possible.** The moose hunting season is simplified by declaring the season the same for residents and non-resident disabled hunters. The number of permits issued will remain the same as currently exists; as will the hunt area. The qualifications for being eligible for this hunt (purple-heart recipient who is 100% disabled) is easily verified by the United States Department of Veterans Affairs.
- **Provide ADFG with a population management option.** This proposal sets the bag limit as one moose, with the exception of a calf or a cow accompanied by a calf. Allowing a small, sustainable harvest of antlerless moose will aid in managing the moose populations. It may also





help prevent the need for much larger, short term, publicly unpopular, periodic adjustment in antlerless moose populations.

- **Provide an easily enforceable hunt.** Consultation was made between the sponsors of this proposal and the Division of Wildlife Troopers of the Department of Public Safety. Prior to submitting this proposal we received an opinion (from Wildlife Enforcement personnel) that this hunt would be easily enforceable.
- **Provide greater opportunity for severely disabled Purple Heart recipients to hunt moose.** The qualifications for eligibility for this hunt were changed to reflect the intent of the declaration of Alaska as a Purple Heart State. Changing the qualifications to recipients of the Purple Heart Medal, who are evaluated as being 100% disabled by United States Department of Veterans Affairs, will simplify applicant eligibility, while ensuring that the most deserving individuals are offered this opportunity to hunt moose.
- **Note:** It is the intent of the authors/sponsors of the proposal that this hunt not be offered via proxy. This hunt is intended to offer an opportunity to those Purple Heart Recipients, who may have given up on hunting because of their physical challenges, to once again personally experience the thrill and excitement of hunting big game in Alaska.

3. COMPROMISES:

This proposal has resulted from compromises among members of the public who: prefer only to kill bulls; prefer to have only a random draw of all disabled individuals or even all hunters; prefer to allow resident hunters more opportunity (longer season) to hunt moose; prefer not to create a special hunt for severely disabled hunters because of prior abuse and discrepancies in the disabilities designation process; prefer to create a special hunt on private or public lands off limits to the general public.

4. SUMMATION: This proposal provides an opportunity to offer a hunting experience to those disabled individuals who have sacrificed so much for each of us and this country. Should this proposal be accepted by the BOG, an opportunity will exist for changes every two years, in the event that a discrepancy is identified.

Sincerely,

Donald Quarberg  
Chairman  
DJ F&G AC  
Delta Junction, Alaska  
907-895-4650

Richard D. Barth  
Natural Resources Manager  
DPW-Environmental  
Fort Greely, Alaska  
907-873-4202  
"Soldiers First!"



Submitted By  
Hannah  
Submitted On  
1/31/2014 4:06:15 PM  
Affiliation  
Denali Citizens Council

Phone  
907-687-2403  
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Address  
PO Box 78  
Denali Park, Alaska 99755

On behalf of the board and over 300 members of the Denali Citizens Council (DCC), I am submitting comments on the Board of Game's 2013/2014 Proposed Changes to Regulations. DCC represents local, regional and national citizens with a particular interest in maintaining the natural integrity of this region. We appreciate the opportunity to comment. Thank you for the opportunity to submit comments online. This forum is easier for many local residents to use, and makes the public process easier and more accessible to many Alaska citizens.

Proposal 51, Hunting seasons and bag limits for fur animals (Lengthen the wolf season) – Oppose

We are opposed to increasing the length of the season for taking wolves in game management Subunits 20A and 20C. The wolf populations are already at extreme lows in nearby federal lands, and are likely also at low population levels on state lands, and this action is not needed.

Proposal 52, Brown bear tag fee exemptions – Oppose

We are opposed to tag fee exemptions for brown bears. As a state resource, we feel that a \$25 fee is nominal and does not need to be reduced or eliminated.

Proposal 97, Hunting seasons and bag limits for moose (reauthorize the antlerless moose seasons in Unit 20A) - Oppose  
We understand that the Department has found that moose numbers in 20A are down to a point at which an antlerless hunt is not necessary in this area. Because of this, and widespread local opposition because of the social impacts, we are opposed to the reauthorization of the antlerless moose hunt in 20A at this time.

Proposal 98, Hunting seasons and bag limits for moose - Support

We support reducing the chance of waste (in the case of hunters shooting a bull then realizing it did not meet antler restrictions), and taking pressure off the largest bull moose in a population by changing regulation to "any bull" in 20A.

Proposal 99, Controlled Use Areas (Remove the Wood River CUA) - Oppose

Proposal 100, CUA (Modify the boundaries of the Wood River CUA) - Oppose

We support the preservation of non-motorized hunting opportunities, which is a scarce opportunity for hunters who desire a non-motorized hunt. Eliminating areas for non-motorized hunts and promoting more motorized access is not equitable for hunters who prefer an opportunity for non-motorized access. There are already so few opportunities for non-motorized hunting in Interior Alaska, and eliminating or reducing the size of the Wood River CUA would make this type of hunting opportunity even more scarce.

Proposal 101, Hunting Season and bag limits for moose - Unsure ,need clarification

It's unclear how additional hunting opportunities in the Yanert CUA or the Wood River CUA will alleviate problems with moose on the road system.



Limiting proxy hunting to one per year would help to reduce localized overharvest. Keeping the limit at one would still provide an opportunity for those who need a proxy.

Proposal 104, and 105, Permit for hunting black bear with the use of bait or scent lures (allow harvest of brown bear over black bear bait sites in 20A and 20B) – Oppose

Proposal 162, Feeding of Game (clarify that brown bears can be taken over bait)– Oppose

Using bait to hunt grizzly bears is an unethical form of hunting that should not be allowed. Not only is it unethical, it habituates bears to food, and creates a public danger for nearby cabin owners and recreational users. We are opposed to the baiting of both black and grizzly bears. Baiting of black bears inevitably will attract grizzly bears, which is why baiting of black bears should be eliminated.

Proposals 116, CUA (Create Nenana-Totchaket Resource Development Corridor CUA) – Support

Proposal 117, CUA (Reinstitute the Nenana CUA) – Support

We support the reinstatement of the Nenana Controlled Use Area, and/or the Nenana-Totchaket Resource Development Corridor Controlled Use Area. Access to this area has improved due to recent natural gas developments and road improvements, which will lead to increased use of the area for hunting, specifically motorized hunting that may not have been possible, or at least would have been much more difficult before the development occurred. At a minimum, we hope the Board will create a temporary Controlled Use Area to ensure that negative impacts to local residents and wildlife populations are not dramatically increased from this increased access. We support the preservation and establishment of non-motorized hunting opportunities, which is a scarce opportunity for hunters who desire a non-motorized hunt.

Proposal 172, Remove black bears from the furbearer classification – Support

The practice of snaring bears is unethical and should be eliminated. It can condition bears to food (creating a danger for nearby residents and recreational users), and also increases the “incidental take” of brown bears who are drawn to the same bait set up for snaring black bears. Like bait stations (see comments on Proposals 104, 105, 162), this form of hunting should not be allowed.



Submitted By  
Douglas Hoftiezer  
Submitted On  
1/15/2014 5:17:07 PM  
Affiliation

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920-889-1744

Email  
[dnkhofstiezer@gci.net](mailto:dnkhofstiezer@gci.net)

Address  
PO Box 1674  
Seward, Alaska 99664

I'm writing this in support of opening an earlier sheep season for bowhunters only. The impact on sheep populations will be extremely minimal and it will be primarily resident utilized.



**GATES OF THE ARCTIC NATIONAL PARK  
SUBSISTENCE RESOURCE COMMISSION  
4175 Geist Road  
Fairbanks, AK, 99709  
(907) 455-0639 or FAX (907) 455-0601**

November 19, 2013

Mr. Ted Spraker, Chairman  
ATTN: Alaska Board of Game Comments  
Alaska Department of Fish and Game  
Board Support Section  
P.O. Box 115526  
Juneau, Alaska 99811-5526

Dear Chairman Spraker,

The Gates of the Arctic National Park Subsistence Resource Commission (SRC) met in Fairbanks on November 5 and 6, 2013. The SRC reviewed the Alaska Board of Game proposals pertaining to the Gates of the Arctic area for your January 2014 meeting in Kotzebue and would like to provide comments for the following proposals:

**Proposal 20: Extend the bull moose hunting season in Unit 26A**

The Gates of the Arctic National Park Subsistence Resource Commission unanimously supports the proposal. Bull moose are starting to move around later in the season, so an extended season would ensure that hunters are successful in getting a moose.

**Proposal 21: Allow moose hunting in the Anaktuvuk Pass Controlled Use Area, modify the bag limit, and change the nonresident moose permit allocation for nonresidents**

The Gates of the Arctic National Park Subsistence Resource Commission unanimously opposes the proposal because an increase in air traffic north of Anaktuvuk Pass has the potential to deflect the caribou herds. The SRC would like to minimize any aircraft activity or hunting north of the community.

**Proposal 32: Open a bowhunting only season for Dall sheep in the Arctic/Western Region**

The Gates of the Arctic National Park Subsistence Resource Commission unanimously opposes this proposal. The Dall sheep population in these regions cannot support additional hunting pressure. The Dall sheep population in 26B has declined dramatically because of the late spring and hard winter.

**Proposal 33: Change nonresident sheep hunts to drawing hunts and limit the permit distribution to ten percent of the annual ten year average for the Arctic/Western Region**

The Gates of the Arctic National Park Subsistence Resource Commission deferred this proposal. There is not enough information for the SRC to evaluate this proposal.



**Proposal 34: Allocate a small percent of game harvest for nonresidents in Unit 26**

The Gates of the Arctic National Park Subsistence Resource Commission deferred this proposal. This proposal does not give a defined percentage to allocate. There are no specifics addressed with this proposal.

**Proposal 70: Retain the winter registration moose hunt in Unit 24B (RM833)**

The Gates of the Arctic National Park Subsistence Resource Commission unanimously supports the proposal with modification to include portions of Unit 24C. This proposal will reauthorize the current winter hunt in Units 24B and 24C.

**Proposal 136: Establish definitions for subsistence hunting and subsistence uses**

The Gates of the Arctic National Park Subsistence Resource Commission deferred this proposal due to vagueness.

**Proposal 137: Establish a definition for subsistence hunting**

The Gates of the Arctic National Park Subsistence Resource Commission unanimously opposes this proposal because it would be detrimental to rural residents.

**Proposal 139: Remove the harvest ticket requirement and require harvest reports for certain non-permit hunts**

The Gates of the Arctic National Park Subsistence Resource Commission unanimously opposes this proposal. This proposal would be detrimental to elder households that do not understand how harvest reporting works.

**Proposal 140: Require each harvest report or permit to specify whether the hunt was conducted to provide a wildfood harvest for subsistence uses or for recreational values**

The Gates of the Arctic National Park Subsistence Resource Commission unanimously opposes this proposal. Residents from cities claim to be subsistence users when they are really trophy hunters. This proposal will bolster the amounts necessary for subsistence use by urban people.

Thank you for the opportunity to comment.

Sincerely,

Pollock Simon Sr., Chair

Jack Reakoff, Vice Chair

Co: NPS Alaska Regional Director  
Superintendent, Gates of the Arctic National Park and Preserve  
North Slope, Northlwest Arctic and Western Interior Regional Advisory Councils  
Governor of Alaska

Pollock Simon, Sr. (Chairman), Jack Reakoff (Vice-Chairman), Taqulik Hops, Tim Fickus, Rachel Riley, Louie Cormack, James Negoak, MacArthur Tickell, and Gary Hanchett



Submitted By  
Hannah  
Submitted On  
1/31/2014 4:08:12 PM  
Affiliation

Thank you for the opportunity to submit comments online. This forum is easier for many local residents to use, and makes the public process easier and more accessible to many Alaska citizens.

Proposal 51, Hunting seasons and bag limits for fur animals (Lengthen the wolf season) – Oppose

I am opposed to increasing the length of the season for taking wolves in game management Subunits 20A and 20C. Wolf populations in the area are already at low population numbers, and increasing the hunting season is not necessary.

Proposal 52, Brown bear tag fee exemptions – Oppose

I am opposed to tag fee exemptions for brown bears. As a state resource, I feel that a \$25 fee is nominal and does not need to be reduced or eliminated.

Proposal 97, Hunting seasons and bag limits for moose (reauthorize the antlerless moose seasons in Unit 20A) - Oppose

I understand that the Department has found that moose numbers in 20A are down to a point at which an antlerless hunt is not necessary in this area. Because of this, and widespread local opposition because of the social impacts, we are opposed to the reauthorization of the antlerless moose hunt in 20A at this time.

Proposal 98, Hunting seasons and bag limits for moose - Support

I support reducing waste (in the case of hunters shooting a bull then realizing it did not meet antler restrictions), and taking pressure off the largest bull moose in a population.

Proposal 99, Controlled Use Areas (Remove the Wood River CUA) - Oppose

Proposal 100, CUA (Modify the boundaries of the Wood River CUA) – Opposed

I support the preservation of non-motorized hunting opportunities, which is a scarce opportunity for hunters who desire a non-motorized hunt. Eliminating areas for non-motorized hunts and promoting more motorized access is not equitable for hunters who prefer an opportunity for non-motorized access. There are already so few opportunities for non-motorized hunting in Interior Alaska, and eliminating or reducing the size of the Wood River CUA would make this type of hunting opportunity even more scarce.

Proposal 101, Hunting Season and bag limits for moose - Oppose, unless amended

It's unclear how additional hunting opportunities in the Ferry Trail Management Area, Yanert CUA or the Wood River CUA will alleviate problems with moose on the road system. Using road system safety concerns for hunts in these areas is not explained by this proposal and, at a minimum, Proposal 101 should be amended so that areas far from the road system are not included.

Proposal 103, Taking of game by proxy (limit in Units 20A and 20B) – Support

Limiting proxy hunting to one per year would help to reduce localized overharvest. Keeping the limit at one would still provide an opportunity for those who need a proxy.

Proposals 104 and 105, Permit for hunting black bear with the use of bait or scent lures (allow harvest of brown bear over black bear bait sites in 20A and 20B) – Oppose

Proposal 162, Feeding of Game (clarify that brown bears can be taken over bait)– Oppose

Using bait to hunt grizzly bears is an unethical form of hunting that should not be allowed. Not only is it unethical, it habituates bears to

food, and creates a public danger for nearby cabin owners and recreational users. We are opposed to the baiting of grizzly bears. Baiting of black bears inevitably will attract grizzly bears, which is why baiting of black bears should be



Proposal 116, CUA (Create Nenana-Totchaket Resource Development Corridor CUA) – Support

Proposal 117, CUA (Reinstitute the Nenana CUA) – Support

I support the reinstatement of the Nenana Controlled Use Area, and/or the Nenana-Totchaket Resource Development Corridor Controlled Use Area. Access to this area has improved due to recent natural gas developments and road improvements, which will lead to increased use of the area for hunting, specifically motorized hunting that may not have been possible, or at least would have been much more difficult before the development occurred. At a minimum, I hope the Board will create a temporary Controlled Use Area to ensure that negative impacts to local residents and wildlife populations are not dramatically increased from this increased access. I support the preservation and establishment of non-motorized hunting opportunities, which is a scarce opportunity for hunters who desire a non-motorized hunt.

Proposal 121, CUA (Create a CUA around the Road to Tanana in Unit 20F) – Support

Access to this area is proposed to be improved, which will lead to increased use of the area for hunting, specifically motorized hunting that may not have been possible, or at least would have been much more difficult before the development occurred. At a minimum, I hope the Board will create a temporary Controlled Use Area to ensure that negative impacts to local residents and wildlife populations are not dramatically increased from this increased access. I support the preservation and establishment of non-motorized hunting opportunities, which is a scarce opportunity for hunters who desire a non-motorized hunt.

Proposal 140, Harvest tickets and reports (require specification of whether hunt was for subsistence or recreation) – Support

It seems reasonable to ask hunters to check an extra box, so that the state can better determine the purpose of hunting opportunities to make management decisions in the future.

Proposal 172, Remove black bears from the furbearer classification – Support

The practice of snaring bears is unethical and should be eliminated. It can condition bears to food (creating a danger for nearby residents and recreational users), and also increases the “incidental take” of brown bears who are drawn to the same bait set up for snaring black bears. Like bait stations (see comments on Proposals 104, 105, 162), this form of hunting should not be allowed.



Submitted By  
Isaac Rowland  
Submitted On  
10/30/2013 1:14:11 PM  
Affiliation  
  
Phone  
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Email  
[isaac@reconllc.net](mailto:isaac@reconllc.net)  
Address  
1102 Violet Dr  
Fairbanks, Alaska 99712

30 October, 2013

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

Attn.: Mr. Spraker

Re: Comments on proposals #94, 95, 116, 32, 47

Mr. Spraker,

#### **Proposal #94 - SUPPORT w/ Amendments**

Proposal #94 seeks to move the caribou season in the Macomb CUA from Aug 10-27th to Aug 26-Sept 20. It also eliminates the Aug 26-27 motorized hunt in the DCUA.

It has been my experience that the current August hunt in the Macomb CUA is very poor. Although there are typically many caribou in the areas accessible on foot, they are almost exclusively cow, calves, and a very few small bulls. I very much enjoy hunting the area, but would strongly prefer that the hunt in the Macomb CUA be extended into September to allow for a greater chance at mature bulls for hunters willing to hike into the area.

Although I support the proposal as written, I recognize that it eliminating the motorized hunt may significantly lower the overall caribou harvest. My recommendation is as follows:

#### **WEST of the Johnson River (DCUA) – Registration Aug 10-27th**

#### **EAST of the Johnson River (Macomb CUA and GMU 12) - Registration Aug 10th – Sept 20th or quota is met.**

The hunt has not met the allowable harvest quota for several years, and it is very unlikely that walk-in hunters in the extended season would cause a significant overharvest in the Macomb CUA. Both the distance and elevation gain that is required for hunters to reach the herd will fundamentally limit hunting pressure. However, for those hunters willing to put in the effort, an extended September season would likely provide a much higher quality hunt than is currently available during the August season.

#### **Proposal #95 - SUPPORT w/ Amendment**

Proposal #95 seeks to shorten the Macomb caribou herd registration hunt while at the same time adding an additional drawing hunt after August 25th. The purpose of the proposal is to limit and spread out hunting pressure during the time when the DCUA is open to motorized access.

I support proposal #95 in concept, however I do believe as a side effect it un-necessarily limits walk in hunters in the Macomb CUA. The Macomb CUA does not have a motorized season, and by requiring both a draw tag and non-motorized access it essentially “doubles down” on restrictions in that area, and it is likely that very few hunters would access the Macomb Plateau during the preferred September hunt time frame.

My recommendation would be to extend the season to Sept 10th as requested, but only require a drawing tag for the outside the Macomb CUA.



### **Proposal #116 – OPPOSE**

Proposal #116 seeks to institute a new Controlled Use Area around the Totchaket Right of Way. As written, the proposal would create a non-motorized area both on and 2 miles either side of the road being developed on the west side of the Nenana River. The Totchaket Corridor stretches from the Nenana River at Nenana to the Kantisha River, a distance of nearly 30 miles.

It is my opinion that these restrictions are un-necessarily drastic. Because there is essentially no foot access to the area, this non-motorized CUA would essentially eliminate all hunting in prime area of nearly 120 square miles.

In addition, a large fire burned the majority of the Totchaket highway corridor in 2009, and the area now supports extensive young aspen, willow, and birch re-growth. In addition there are numerous wetland areas in the unit. It has been my observation that the moose population is doing very well.

I strongly OPPOSE this proposal.

### **Proposal #32, #47**

This proposal seeks to open an early, archery only, sheep seasons.

I have no significant objection to this proposal. However, the BOG should consider if this proposal should apply to non-residents as well as residents. It is possible that by adding an early season hunt that is open to non-residents, an increase in pressure may result by essentially allowing each guide in the field to book one additional client per season. While success rates for archery residents is extremely low, success rates for guided hunters is much higher.

Sincerely,

Isaac Rowland



Submitted By  
James  
Submitted On  
10/9/2013 10:03:15 AM  
Affiliation

Dear Board Members,

For the record my name is James Pound from Soldotna, Alaska. I have hunted in unit 13 for the past several years and prior to that in unit 14. This past year it became very obvious that unit 13, especially in the Tangle Lakes and Swede Lake area is now overpopulated with hunters during the September season. This is due in part to the liberal approval of caribou permits in the region. Additionally, this is due to a requirement that an individual with a caribou permit in unit 13 must hunt moose in the same unit. The bull moose population in unit 13 is being overhunted by this policy.

I would ask the board to consider a revision for the 2014-2015 hunting season in unit 13. Allow caribou permit hunters to seek moose in other units. As an example, since the cow caribou permit in 2013 was only good for one day many hunters would have more than likely gone to other units to hunt for moose. This would have greatly improved the number of hunters in unit 13. You have parking areas in the unit that rival downtown Anchorage for the number of vehicles parked.

Presently, Fish and Wildlife protection has two enforcement officers for an area that is probably the size of New Jersey. It is difficult for them to keep up. I am sure if you ask them, they will agree.

I request that the board seriously review this request and consider it as a viable option for future hunting in Unit 13. At least an experiment for 2014 and lets see how it works.

I thank you in advance for your consideration.

James Pound



Submitted By  
Joe Letarte  
Submitted On  
1/30/2014 4:31:43 PM  
Affiliation  
Self

Phone  
907-488-7517

Email  
[letarte@alaska.net](mailto:letarte@alaska.net)

Address  
Box 16075  
Two Rivers, Alaska 99716

Proposals 39, 40, 42, 43, 44, 45, 46, 48, 49, all deal with the elimination of non resident hunters. I am not in favor of this option and feel it has time and time again been shown to not be needed or wanted except for a few individuals. Please disregard these proposals.



Submitted By  
Joe Letarte  
Submitted On  
1/30/2014 4:50:14 PM  
Affiliation  
Self

Phone  
907-488-7517

Email  
[letarte@alaska.net](mailto:letarte@alaska.net)

Address  
Box 16075  
Two Rivers, Alaska 99716

I support proposal 80. I have hunted and guided in 25D for almost 30 years and can safely say the number of grizzly bear has increased in those years substantially. I see grizzly bear running moose in the spring on a regular basis and grizzly have gone from uncommon to very common. If we want moose numbers to ever recover we must deal with the grizzly numbers now. We now get multiple bears at a time on our bait stations and I will send in pictures to back up my statement

**Pilcher, Nissa R B (DFG)**

---

**From:** Joe Letarte [REDACTED]  
**Sent:** Friday, January 31, 2014 3:28 PM  
**To:** Pilcher, Nissa RB (DFG)  
**Subject:** Re: BoG Pictures for Joe Letarte Proposal 80

These pictures are from my bear bait stations in unit 25D. I now have so many bears in this area it is almost impossible to hunt black bear over the baits. The Moose management plan that was done by the USFWS, Local Villages, Fish and Game, and local guides back in the 90s identified the need to take more bears to enhance the moose population that has been depressed for many years. This form of hunting is a good way to implement the wishes of the moose management plan. If Moose are to make a come back in the area we have to thin out the grizzly population. A vote against this proposal is a vote against people of the Yukon river having moose meat for there survival. I have countless more pictures like theses from the last three years. I will be out of town the first few days of the meeting in February so will not be able to testify in person. I will be present during the week of the meeting should you have any questions. 907-488-7517



Stealth Cam

082 F

04-11-2012 10:06:29





Submitted By  
John Sones  
Submitted On  
1/29/2014 3:43:04 PM  
Affiliation

Phone  
907-978-8523

Email  
[john.sones@faa.gov](mailto:john.sones@faa.gov)

Address  
P.O. Box 57152  
North Pole, Alaska 99705

I don't support Proposal 55 that would make it unlawful to trap or snare bear.



Submitted By  
John Sones  
Submitted On  
1/29/2014 3:45:44 PM  
Affiliation

Phone  
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Email  
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Address  
P.O. Box 57152  
North Pole, Alaska 99705

I don't support Proposal 69 to select another client if original applicant is unable to hunt.



Submitted By  
John Sones  
Submitted On  
1/29/2014 3:50:12 PM  
Affiliation

Phone  
907-978-8523

Email  
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Address  
P.O. Box 57152  
North Pole, Alaska 99705

I don't support Proposal 81 for sheep non-resident 10% guide 50% non-resident 2nd degree kindren.



Submitted By  
John Sones  
Submitted On  
1/29/2014 3:53:12 PM  
Affiliation

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907-978-8523

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Address  
P.O. Box 57152  
North Pole, Alaska 99705

I support Proposal 92 one bison per lifetime.



Submitted By  
John Sones  
Submitted On  
1/29/2014 3:56:12 PM  
Affiliation

Phone  
907-978-8523

Email  
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Address  
P.O. Box 57152  
North Pole, Alaska 99705

I support Proposal 94 to change dates for caribou on Macomb plat (Delta).



Submitted By  
John Sones  
Submitted On  
1/29/2014 4:18:42 PM  
Affiliation

Phone  
907-978-8523

Email  
[john.sones@faa.gov](mailto:john.sones@faa.gov)

Address  
P.O. Box 57152  
North Pole, Alaska 99705

I support Proposal 104 to harvest grizzly over Black Bear bait in 20A & 20B. I have established bait stations for over 20 years in these areas. Confrontations with grizzlies has dramatically increased in these areas. Grizzly populations have increased to the point of not seeing black bear as we once did in these areas. We have video of 7 grizzlies on one bait at one time with a hunter present. Their have been multiple cases of grizzly bears having to be sprayed with pepper spray on these baits due to their agressions. In three cases grown grizzly sows have attempted to reach hunters in tree stands over these baits (we have video). Many warning shots have had to be fired into the ground to scare these bears. These shots were ignored in most cases by the bears and they left when they wanted to. In one case a grown grizzly boar chased my daughter and I for over a half mile on four wheeler and I had to shoot 6 warning shots to drive the bear away when it would not give up chase. Our main bait area within 10 miles of Chena Hotsprings road South Fork of Chena has had to be abandoned due to the number of grizzlies working the baits. Their are many more grizzly bears inside the Fairbanks area than the public realizies and when black bear baits are not being baited any more because grizzlies are on them where do you think the bears go looking for food.



Submitted By  
John Sones  
Submitted On  
1/29/2014 4:20:48 PM  
Affiliation

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907-978-8523

Email  
[john.sones@faa.gov](mailto:john.sones@faa.gov)

Address  
P.O. Box 57152  
North Pole, Alaska 99705

I support Proposal 107 to open non-res in minto flats.



Submitted By  
John Sones  
Submitted On  
1/29/2014 4:22:55 PM  
Affiliation

Phone  
907-978-8523

Email  
[john.sones@faa.gov](mailto:john.sones@faa.gov)

Address  
P.O. Box 57152  
North Pole, Alaska 99705

I support Proposal 109 to change muzzleloader to registration and dates.



Submitted By  
John Sones  
Submitted On  
1/29/2014 4:26:26 PM  
Affiliation

Phone  
907-978-8523

Email  
[john.sones@faa.gov](mailto:john.sones@faa.gov)

Address  
P.O. Box 57152  
North Pole, Alaska 99705

I dont support eliminating muzzleloader hunt on upper Salcha River. There is a huntable population in this area they are just harder to get at than other areas. We glassed bulls but failed to close.



Submitted By  
John Sones  
Submitted On  
1/29/2014 4:29:26 PM  
Affiliation

Phone  
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Email  
[john.sones@faa.gov](mailto:john.sones@faa.gov)

Address  
P.O. Box 57152  
North Pole, Alaska 99705

I support Proposal 113 to install Dall sheep hunts for youth. We could have more youth hunters if they could hunt before school starts back up.



Submitted By  
John Sones  
Submitted On  
1/29/2014 4:31:17 PM  
Affiliation

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Address  
P.O. Box 57152  
Norht Pole, Alaska 99705

I don't support Proposal 120 in 20F for trophy destruction.



Submitted By  
John Sones  
Submitted On  
1/29/2014 3:39:50 PM  
Affiliation

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907-978-8523

Email  
[john.sones@faa.gov](mailto:john.sones@faa.gov)

Address  
P.O. Box 57152  
North Pole , Alaska 99705

I support Proposal 43 Open sheep 10 days before non-residents.



Alaska Department of Fish and Game  
ATTN: Board Support Section  
PO Box 115526  
1255 W. 8<sup>th</sup> Street  
Juneau, AK 99811-5526

Dear Sirs/Madams,

I am writing regarding Proposal 117 – 5 AAC 92.540 that is intended to restrict airboat usage in the Wood River area of Units 20A and 20C.

As a lifelong Alaskan I do not support this proposed restriction.

If indeed the moose population is in decline, restricting a group of hunters based on what they use for transportation is not appropriate. Instead institute size and/or number restrictions that apply fairly to everyone to ensure that the game is not over-harvested.

Once again we find ourselves playing the "have" versus "have not" game. This has very little to do with game management and everything to do with managing people. It is focused on benefiting one user group over another user group, with no real regard for the stability of the moose population.

We need to remember that this resource is held in commonality among all of the people of the State of Alaska.

It belongs to all of us not just a few.

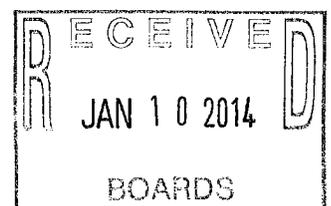
Please reject Proposal 117 – 5 AAC 92.540.

Best Regards,

Keith Sims-Larson

[Simslarson06@hotmail.com](mailto:Simslarson06@hotmail.com)

*Keith R Sims-Larson* 1/3/2014





Comments for 2014 Interior BOG Meeting in Fairbanks

Proposal #39 and 45—Support—Alaska are the only western state that does not provide this type of big game asset allocation to its residents. If the Board does not take this action soon, the Alaska Legislature will do it for you.

Proposal #41, 42, 43—Support—Sheep hunting in Alaska is totally over. Just about every serious sheep hunter I know goes to Canada to hunt sheep these days. There is just too much money involved in the reinstate sAlaska guided hunt industry and the money has ruined Alaska sheep hunting. If the BOG doesn't do something to fix this soon, the Alaska Legislature will do it for you by abolishing the non-resident requirement to have a guide to hunt sheep, brown bear and/or goat.

Proposal #48—Support—for all the reasons mentioned above.

Proposal #75—Support—this hunt is open for 10 months, and due to its popularity has become an overcrowded mess during the peak of the season. There is absolutely no reason not to give Alaska resident hunters a period of time to hunt this area with less crowding. Additionally, this is a perfect place for a youth hunt (archery only), at a time with less crowding.

Proposal #81—Oppose—If you analyze this proposal closely, the result will be a reduction in the number of sheep tags for Alaska residents if it were to be implemented.

Proposal #92—Support—An Alaska resident could apply for a bison tag their entire life and never be drawn, while some people get drawn multiple times. I would prefer a preference point system, but would support something like this.

Proposal #97—Oppose—I have been hunting GMU 20A for close to 40 years, and have seen the ups and downs of the game population out there. The antlerless hunt in 20A should have been shut down two years ago, but the Department has been using inflated total moose numbers. The moose population in 20A is crashing and I am very concerned. The department currently estimates there are 8-10,000 moose. I strongly believe it is closer to 4-5,000 and going down. What is not going down out there is the bear and wolf populations—they are exploding. I have had a trail camera place in the same location, between May 15 and October 1 for the last seven years, and the number of moose captured on the camera has gone from 70-80, to 12 last year, and last year there were no cows/calves, but half of those 12 were wolves and bears!

Proposal #99 and 100—Oppose—There is a need for Controlled Use Areas. People need a place to hunt, where they can get away from track rigs, ATV's, and Argos. There is a reason there are three proposals you will be considering requesting the Board to ome CUA's, and the reason is what I stated above.

Proposal #101—Oppose—Just another excuse to conduct an antlerless hunt in the Interior at a time when the moose population is crashing.



Proposal #103—Support—Proxy hunting is out of control, and need to be throttled back.

Proposal #104 and #105—Support—Grizzly bear populations are exploding in the Interior, and there is a great need take them over black bear bait when the opportunity presents itself.

Proposal #108—Support—According to the Department this area has a very high population of moose. The only reason airboats are restricted now is pure politics. Quit the politics and listen to the Department.

A handwritten signature in cursive script that reads "Larry Dalrymple".

Larry Dalrymple

767 Chena Hills Drive

Fairbanks, Alaska, 99709

907-388-1975



Submitted By  
Mark Renson  
Submitted On  
1/6/2014 9:04:50 AM  
Affiliation

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Proposition 117

Sir/Ma'am

I am opposed to Proposal 117 – 5 AAC 92.540 that is intended to restrict airboat usage in the Wood River area of Units 20A and 20C. Restricting access to one group of transportation user is not an effective harvest control method. It unfairly restricts access to the hunting area for one group while creating a favoritism status for another user group. Moose populations should be managed in accordance with established proven methods and not treat one transportation user group with prejudice based on misperceptions. Fair chase and spot and stalk hunting practices are common hunting methods for all hunters regardless of the means used to enter the hunt area.

Please reject Proposal 117 – 5 AAC 92.540.

Mark Renson



Submitted By  
Marty Williams  
Submitted On  
10/16/2013 2:25:04 PM  
Affiliation  
None

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Fairbanks, Alaska 99709

I would like to see the regulations changed that requires a person who hunts subsistence caribou in unit 13 to be allowed to hunt moose in other units. The current law has increased the amount of hunters in unit 13 to an unsustainable number. I have hunted this unit for over 50 years and never seen so many hunters. Moose are sparse in the unit and the current policy will endanger the health of the herd. I believe this decision to implement this requirement was politics and not based on good science. I feel the same way about the community hunt program. End it please. It is ripe for abuse.

A system needs to be implemented to prohibit hunters from harvesting a federal caribou and a state caribou. If you draw a federal caribou you should not qualify for a state caribou. This would not change the harvest level and would allow more hunters to take a state caribou.

Also we traditionally would take a winter caribou and with the current management that is all but eliminated. Save some permits for the winter hunt



Submitted By  
Michael Raffaeli  
Submitted On  
1/30/2014 10:39:34 PM  
Affiliation

Thank you for the allowing the opportunity to submit comments online.

#### Proposal 51- Opposition

Extending the hunting season on wolves will impact potential opportunity for wildlife viewers to see wolves during the peak tourism season

#### Proposal 52- Opposition

All hunters need to pay for the wildlife that the state is managing, and the associated costs it takes to manage.

#### Proposal 98 - Support

I support reducing waste (in the case of hunters shooting a bull then realizing it did not meet antler restrictions), and taking pressure off the largest bull moose in a population.

#### Proposals 99, 100 - Opposition

I support the preservation of non-motorized hunting opportunities, which is a scarce opportunity for hunters who desire a non-motorized hunt. Eliminating areas for non-motorized hunts and promoting more motorized access is not equitable for hunters who prefer an opportunity for non-motorized access. There are already very few opportunities for non-motorized hunting in Interior Alaska, and eliminating or reducing the size of the Wood River CUA would make this type of hunting opportunity even more scarce.

#### Proposal 103 – Support

Limiting proxy hunting to one per year would help to reduce localized overharvest. Keeping the limit at one would still provide an opportunity for those who need a proxy.

#### Proposals 104, 105, 162 – Opposition

Using bait to hunt grizzly bears is an unethical form of hunting that should not be allowed. Not only is it unethical, it habituates bears to food, and creates a public danger for nearby cabin owners and recreational users. I am opposed to the baiting of both black and grizzly bears. Baiting of black bears inevitably will attract grizzly bears, which is why baiting of black bears should be eliminated.

#### Proposals 116, 117 – Support

We support the reinstatement of the Nenana Controlled Use Area, and/or the Nenana-Totchaket Resource Development Corridor Controlled Use Area. Access to this area has improved due to recent natural gas developments and road improvements, which will lead to increased use of the area for hunting, specifically motorized hunting that may not have been possible, or at least would have been much more difficult before the development occurred. I support the preservation and establishment of non-motorized hunting opportunities, which is a scarce opportunity for hunters who desire a non-motorized hunt.

#### Proposal 122- Opposition

All hunters need to pay for the wildlife that the state is managing, and the associated costs it takes to manage.

#### Proposal 150- Support



This is an important clarification to ensure the intent of the law is clear

Proposal 151- Support

This will allow better data to be gathered to assist management of migratory bird take

Proposal 155- Support

This proposal seeds to reduce the potential waste of hunted migratory game birds and helps to clarify the regulations

Proposal 164- Support

As a state resident, I have the right to know more information about the costs of predator management

Proposal 172 – Support

The practice of snaring bears is unethical and should be eliminated. It can condition bears to food (creating a danger for nearby residents and recreational users), and also increases the “incidental take” of brown bears who are drawn to the same bait set up for snaring black bears. Like bait stations (see comments on Proposals 104, 105, 162), this form of hunting should not be allowed.

Proposal 174- Opposition

There is no current biological data to suggest that raptor populations in the state are stable and not in decline, regardless of being more abundant than in other states. The benefits to the state would be minimal in allowing out of state falconers to take this state’s resources

**Miki & Julie Collins**

ALASKAN FREELANCE WRITERS/PHOTOGRAPHERS  
P.O. BOX 69  
LAKE MINCHUMINA, ALASKA 99757

Board of Game Comments  
Alaska Dept. of Fish & Game  
Boards Support Section  
PO Box 115526  
Juneau  
AK 99811-5526

November 6, 2013

Hi,

Just a few comments on some of the 2013/2014 proposals.

Prop. 51 & other wolf season and wolf control proposals: I am opposed to open seasons on fur animals when the pelts are not prime or when they are raising pups. I feel wolf control and extremely liberal seasons should be considered only when wolf populations have grown too big for their local food resources and are a significantly limiting factor in the populations of game animals important to humans. While I do support liberal regulations and active predator control in areas where game animals are depressed because of the targeted predators, just in general I feel it had been overused recently.

Prop 64 (& others): I support this but only if lynx pelts are prime during the proposed season extension. Around here (western 20C) neither lynx nor wolverine are likely to be still in good shape by the end of March. Just in general the more trapping seasons line up with each other in every way (lynx with wolverine; Federal with state etc) the less likely it is that we trappers get confused, goof up and break the law. A prime consideration for every proposal should be, "Is this going to make things even more complicated?!"

Prop 65: I support this as long as local F&G biologists feel the sheep population would not be harmed by it. If the few sheep this would result in being harvested would impact the population, I suggest you pass it anyway and shorten or limit the regular season to make up for it. I have been hearing the Nikolai people talk about this issue for years, about how the Nikolai hunters would travel to the Alaska Range for sheep during the winter and how game laws now prohibit them from doing so while favoring sport hunters. It has been so long now that they have been able to pursue this traditional hunt that those who still know how to do it are getting too old to pass it on. Sheep were a part of their food and lives for generations but are no more because they can't access the hunting area during the current open season. I do think this proposed hunt should be closely monitored to be sure it is not overwhelmed by non-locals flying in to the villages and snowmachining on from there. The purpose should be to provide for an important local traditional hunt that has been denied for too long. I feel very strongly about this.

Thanks for taking my thoughts into consideration, and I hope you have productive and peaceful meetings!



*Miki Collins*



Submitted By  
Myron Heil  
Submitted On  
12/8/2013 7:43:14 PM  
Affiliation

I am writing to fully support proposal 117 restricting airboat usage for moose hunting in NCUA. The use of airboats has not only continued to be a problem for local users, but has grown to the point of disrupting natural wildlife activities and has negatively impacted the quality of hunting for all user groups. The one select user group that chooses to hunt in that manner should not be allowed to have that level of impact on all Alaskans.



Submitted By  
Nan Eagleson  
Submitted On  
1/31/2014 12:21:44 PM  
Affiliation

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Denali Park, Alaska 99755

Proposal 99 and 100, Controlled use Areas. "Opposition"

I oppose removing or modifying the boundaries of the Wood River Controlled Use Area.

I strongly support Controlled Use Areas (CUAs) and oppose opening up more areas to motorized access for hunting. There are plenty of areas that provide motorized access for hunting and they inevitably compromise the habitat and wildlife resources of that area. It is only equitable to provide a variety of hunting opportunities via different motorized and nonmotorized access.

Thank you for the opportunity to comment on line.



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1/31/2014 12:08:44 PM  
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Proposal 98: Support. I would like to support this proposal because it will take the pressure off the biggest bull moose that contribute important genetics to a local population of moose and hopefully, will prevent waste of meat because of misjudgement of antler size



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Submitted On  
1/31/2014 12:27:47 PM  
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Denali Park, Alaska 99755

Proposal 101 Hunting seasons and bag limits for moose. "Support"

I support the targeted moose hunts to hopefully reduce moose-vehicle collisions and to provide alternative hunting opportunities for hunters who hope to provide meat for their freezer,

Thank you for the opportunity to comment on line.



Submitted By  
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1/31/2014 12:46:00 PM  
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Proposal 104 and Proposal 105, Permit for hunting black bear with the use of bait or scent lures. Oppose.

I strongly oppose the use of bait stations for any bears. It is an unethical way of "hunting", it habituates bears to artificially procured food and poses a danger to the public. Educating people for appropriate bear interactions has always emphasizes preventing bears from getting food. Grizzly bears are not going to discriminate whether a bait station is intended for black bears. Other recreational users in an area will unknowingly be subjected to dangerous interactions with bears. I support the concept of Fair Chase for hunters and bear baiting is a completely unethical way to take these animals.



Submitted By  
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1/31/2014 1:27:35 PM  
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Proposal 116 and 117. Controlled Use Areas. Support

I support the creation of the Nenana-Totchaket Resource Development Corridor Controlled Use Area. Because of the new road access and the presence of a number of recreational cabins that are no longer remote, hunting opportunities should be limited to reduce possible conflicts by an increase of hunters new to this area.

I support the reinstatement of the Nenana Controlled Use area to protect the local susistence users particularly because of the new road access to this area.

Thank you for the opportunity to comment on line.



**United States Department of the Interior  
NATIONAL PARK SERVICE**

Alaska Region  
240 West 5<sup>th</sup> Avenue, Room 114  
Anchorage, Alaska 99501

IN REPLY REFER TO:

7.A.2.(AKRO-SUBS)

**JAN 31 2014**

Mr. Ted Spraker, Chairman  
ATTN: Alaska Board of Game Comments  
Alaska Department of Fish and Game  
Board Support Section  
P.O. Box 115526  
Juneau, Alaska 99811-5526

Dear Chairman Spraker:

There are a number of proposals before the Board of Game for your February, 14-23, 2014, meeting in Fairbanks that affect or have the potential to affect National Park Service (NPS) areas in the state. 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). Consistent with past letters and testimony, the NPS asks that NPS areas be excluded from any regulations you may authorize that implement intensive management objectives in Alaska's hunting regulations. We recognize and appreciate previous Board actions that have not authorized intensive management and predator control activities on NPS-managed lands.

Specific comments are below:

Proposal 41-43: Recommendation: Oppose

(Dall sheep: GMU 12, 19, 20, 21, 24, 25, 26 B&C) These proposals would open sheep hunting seasons earlier for residents by either 7 days (#41), 5 days (#42) or 10 days (#43), respectively. In these GMUs and subunits there are general hunts in several NPS preserves. These proposals should be evaluated on a unit-specific basis to ensure conservation of specific populations rather than applied to the entire Interior region. We do not support extending the season in these areas, as they create potential for increased harvest.



In GMU 26B, estimates from the 2013 NPS survey indicate a 50% decline in total sheep numbers and very low productivity compared with 2009-2012. Surveys conducted by other agencies in other parts of the state also show declines in total numbers and/or markedly low productivity following the prolonged winter and cold May (2013). Because this proposal affects Denali, Gates of the Arctic, Lake Clark, Wrangell-St. Elias, and Yukon-Charley Rivers National Preserves, we ask that NPS lands be excluded if the proposal is adopted.

Proposal 51: Recommendation: Oppose

(Wolf: GMU 12, 19, 20, 21, 24, 25, 26 B&C) This proposal would change hunting seasons in all GMUs to open August 5 and end on June 15. As the NPS has commented before, we do not support the hunting season opening prior to August 10 or extending past April 30 as this allows take of vulnerable females and offspring during the pupping and rearing season. Additionally, the value of pelts is often quite low from wolves harvested so early/late in the season. Because this proposal affects Denali, Gates of the Arctic, Lake Clark, Wrangell-St. Elias, and Yukon-Charley Rivers National Preserves, we ask that NPS lands be excluded if the proposal is adopted.

As you are aware, on NPS lands in GMUs 12, 19, 20, 24 and 25 we have prohibited take of wolves between May 1 - August 9. Should you pass this proposal we are compelled to initiate closure/restriction processes following ANILCA §1313 and 36 CFR.

Proposal 53: Recommendation: Oppose

(Black bear: GMU 25C) This proposal would increase the harvest limit from 3 to 5 bears annually with a goal, in part, of increasing moose populations in the area. We have written to the Board before explaining why the NPS does not support harvesting more of one species to benefit another species as it is inconsistent with *NPS Policies 2006* (4.4.3). Because this proposal affects Yukon-Charley Rivers National Preserve, we ask that NPS lands be excluded if the proposal is adopted.

Proposal 54: Recommendation: Oppose

(Black bear: GMU12, 19, 20, 21, 24, 25, 26 B&C) This proposal seeks Board approval for the Department to use existing discretionary authority to issue permits for use of foothold snares to trap black bears. The NPS suggests that this cannot be authorized without a trapping season being authorized, as none currently exists. We again ask the Board to consider removing black bears from their classification as furbearers by deleting them from the definition of furbearers found at 5 AAC 92.990 (a)(21). Finally, we continue to oppose the trapping of black bears in NPS areas. Because this proposal affects Denali, Gates of the Arctic, Lake Clark, Wrangell-St. Elias, and Yukon-Charley Rivers National Preserves, we ask that NPS lands be excluded if the proposal is adopted.

Proposal 55: Recommendation: Support

(Bears: GMU12, 19, 20, 21, 24, 25, 26 B&C) This proposal would forbid the use of snares to take bears. We support the intent of this proposal. This proposal affects Denali, Gates of the Arctic, Lake Clark, Wrangell-St. Elias, and Yukon-Charley Rivers National Preserves.



Proposal 72: Recommendation: Oppose

(Brown bear: GMU 24 C&D) This proposal would add these subunits to the list of areas where it is lawful under state regulation to take a brown bear at a black bear bait station. We have articulated our concerns against authorizing this practice in previous correspondence to the Board and we continue to maintain those concerns. As you are aware, we have also prohibited this practice in NPS areas through our regulatory process in 2013. Should this proposal be supported by the Board, we will be compelled to initiate closure/restriction processes following ANILCA §1313 and 36 CFR. Again, we ask that if this is supported that NPS lands be excluded. This proposal would affect Gates of the Arctic National Preserve.

Proposal 83: Recommendation: Support

(Black bear: GMU 12 & 20E) This proposal would reduce the number of clients a guide could service at one time for black bear baiting from up to 10 clients back to the more traditional level of two clients at a time. NPS has commented in the past against the recent expansion of allowances for guides in this specific activity. This proposal would affect Wrangell-St. Elias and Yukon-Charley Rivers National Preserves.

Proposal 85: Recommendation: Support with amendment:

(Caribou (Nelchina) GMU 12) This proposal establishes a winter hunt in Unit 12 for the Nelchina Caribou Herd. The area addressed in this proposal is also inhabited seasonally by the Mentasta Caribou Herd. The Mentasta Caribou Herd has been closed to harvest since 1994 and has declined from 3100 animals in 1985 to approximately 300 animals today. The NPS recommends that if adopted, this proposal should be modified to incorporate the management goals and objectives of the *Mentasta Caribou Herd Cooperative Management Plan*. This plan was signed by the Alaska Department of Fish and Game, the U.S. Fish and Wildlife Service, the National Park Service and the Upper Tanana - Forty-Mile Advisory Committee in 1995. The plan provides specific provisions to avoid incidental harvest of Mentasta caribou when they are intermixed with other herds. A delegation of authority to the local area manager to open and close the season if Mentasta caribou are present would be necessary to successfully implement the management guidelines established in the cooperative plan. In addition, limiting the harvest to bulls only will reduce the impact to the Mentasta herd if incidental harvest does occur. If the provisions of the *Mentasta Caribou Herd Cooperative Management Plan* are addressed, the National Park Service supports this proposal.

Recommended Amendment (italics and underlined): Season: *The season will be announced by the local area manager.* The hunt will be managed within the Nelchina Caribou Herd quota *and in accordance with the Mentasta Caribou Herd Cooperative Management Plan.* Bag Limit: One *bull* caribou.

Proposal 87: Recommendation: Oppose

(Wolf: GMU 12, 20B, D, E & 25C) This proposal reauthorizes the existing predator control program (5 AAC 92.113(a) (1)), subject to minor changes - most notably that it is intended to



benefit caribou but no longer moose. The proposal “does not apply to any National Park Service or National Wildlife land unless approved by the federal agencies.” The NPS appreciates retention of this wording.

The NPS remains opposed to the continuation of this wolf control plan. The program’s results, outside the preserve boundary, are now having impacts on wolves that routinely utilize lands inside of Yukon-Charley Rivers National Preserve (YUCH) and have been monitored by the NPS since 1993.

This preserve was set aside by Congress and is to be managed “to maintain the environmental integrity of the entire Charley River basin, ...including streams, lakes and other natural features in its undeveloped natural condition for public benefit and scientific study; to protect habitat for and populations of, fish and wildlife including but not limited to...caribou, moose, Dall sheep, grizzly bears and wolves; and in a manner consistent with the foregoing...” ANILCA § 201 (10)

One of the plan’s goals, for years 11-15, is to reduce the wolf population by 75%, from the 2004 estimated population, and maintain it at that level until 2020. The most recent NPS wolf monitoring shows that the wolf control effort has had a heavy impact on the wolves that normally utilize YUCH. In the past 4 years, at least 49 wolves from 6 wolf packs that routinely utilize YUCH lands, and often den inside the preserve, were eliminated by aerial control, outside the preserve. Under this predator control program, 36 wolves were killed last year alone, eliminating 2 of 9 packs collared for NPS monitoring. This situation has the potential to lead to impairment of the natural condition within the preserve, an outcome that we are mandated to avoid.

The Fortymile Caribou Herd (FCH) uses portions of YUCH as its traditional calving ground. Wolves are ever present in the area. This natural cycle of predator/prey interactions has been occurring for a long time and it is our mandate to allow it to continue and evolve on its own natural course and pace.

The high end of the FCH population objective of 50,000-100,000 appears unsustainably high (5 AAC 92.108). There have been signs of nutritional stress in the FCH as documented by the Alaska Department of Fish and Game’s Wildlife Technical Bulletin 14, in *Fortymile caribou herd: Increasing numbers, declining nutrition, and expanding range* (Boertje et al. 2012), and although we recognize that these signals may or may not persist, particularly as the FCH shifts its winter range, this data should be viewed as a significant precautionary signal. It is possible that the habitat could be over-grazed, thereby exacerbating the nutritional stress already documented, culminating in a steep herd decline.



Again, we appreciate the opportunity to provide you with comments on these important regulatory matters and continue to look forward to working with you on these issues. Should you or your staff have any questions, please contact me at 907-644-3505.

Sincerely,

A handwritten signature in black ink, appearing to read "Debora R. Cooper".

Debora R. Cooper

Associate Regional Director, Resources and Subsistence

cc:

- Cora Campbell, Commissioner, ADF&G
- Kristy Tibbles, Executive Director, Alaska Board of Game, ADF&G
- Pat Pourchot, Special Assistant to the Secretary for Alaska
- Geoff Haskett, Regional Director, FWS
- Chuck Ardizzone, FWS
- Jeanette Koelsch, Superintendent, Bering Land Bridge
- Don Striker, Superintendent, Denali
- Greg Dudgeon, Superintendent, Gates of the Arctic
- Margaret Goodro, Superintendent, Lake Clark
- Frank Hays, Superintendent, Western Arctic Parklands
- Rick Obernesser, Superintendent, Wrangell-St. Elias
- Dave Mills, Subsistence Team Leader, NPS
- Sandy Rabinowitch, Subsistence Manager, NPS
- Chris Pergiel, Chief Law Enforcement Officer, NPS-Alaska Region



Submitted By  
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Submitted On  
1/29/2014 12:13:44 PM  
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Proposal 43. I support . Guides still have the same season. So they can't say no money for the state. Now I have been sheep hunting when guide came in with horses can't compete with horses or supercub. So this would be great for residents.



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Proposal 55 I don't support this proposal. I am all for the snaring of black and grizzly bears. Very effective and cheaper than using aircraft. Unit 16 might be experimental other villages have been snaring bears for years.



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1/29/2014 12:37:11 PM  
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Proposal 69 I don't support. As a resident if get sick or whatever I don't get to give my drawing permit to someone else.



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1/29/2014 12:46:38 PM  
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Proposal 81 I don't support. Sounds like a problem with Guides maybe eliminating all non residents sheep permits would fix it.



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1/29/2014 12:50:04 PM  
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Proposal 92 I support.Would be nice to have a better chance of drawing a permit.



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1/29/2014 12:55:06 PM  
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Proposal 94 I support.



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1/29/2014 1:15:47 PM  
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Proposal 110 I don't support. Please don't eliminate this hunt. Date change will help access.



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Proposal 113 I support. I have kids it would be nice to for them to have a opportunity before school without a lot of pressure.



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1/29/2014 1:25:07 PM  
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Proposal 120 and 121 I don't support no more restrictions or rules please.



# PROPOSAL #92 - Support

I support the Board of Game changing the Delta Bison Drawing Hunts to "one per Lifetime of hunter" and "one permit per household per Regulatory year". Allowing applicants to potentially draw one Bull and one Cow in their lifetime. This change would ensure two Bison would go to atleast two households during any single season. These changes will help spread out these precious few permits among more Alaskans. Currently, one Bison may be taken every 10 years.

UNIVERSITY OF ALASKA DELTA POLAR REGION BUREAU OF LAND MANAGEMENT DELTA POLAR REGION BUREAU OF LAND MANAGEMENT DELTA POLAR REGION BUREAU OF LAND MANAGEMENT

Print Name	Signature	City
John Soles		North Pole
Chris Strawn		Fairbanks
Chad Petsch		Fairbanks
Merle Goodridge		North Pole
DAVID MACHACEK		FAIRBANKS
Justin Boren		Fairbanks
DAN STAELE		FAIRBANKS
Melissa Rowland		NORTH POLE
Oliver Rowland		North Pole
Michael Skellic		North Pole
Angela Shellie		North Pole
Kristie Fawcettner		North Pole
Tim Fawcettner		North Pole
Arnold Voigt		North Pole
Dan Glass		Fairbanks
Tammy Bowe		Fairbanks
Angela Norville		FBKS
Brett M. Roberts		Fairbanks
Bruce Hamilton		FBKS
Talitha Roberts		FBKS
JOHN FOWK		Fairbanks
Deanna Fitzgerald		North Pole
Catherine E Williams		North Pole
Troy D. Williams		North Pole
Troy O. Williams		North Pole
BARRY C. BOYD		FAIRBANKS
ROBERT L. MARTIN		FAIRBANKS





# PROPOSAL #113 - Support

I Support the Board of Game creating a limited "Youth Only" Sheep Drawing Hunt in GMU 20, with the hunt held annually during July. Youth would be required to be accompanied in the field with an adult. Biologists with ADF&G would determine appropriate quantity of sustainble permits to be issued.

Print Name	Signature	City
JON DDTY		FAIRBANKS
Chris Strann		Fairbanks
John Sones		North Pole
Chad Petsch		Fairbanks
Merle Goodridge		North Pole
DAVID MACHACEK		FAIRBANKS
Justin Boren		Fairbanks
DAN STEELE		FAIRBANKS
Melissa Rowland		NORTH POLE
Otisw. Rowland		NORTH POLE
TIM FEULTNER		north pole
Michael Skellie		North Pole
Angela Skellie		North Pole
Arnold Vogt		North Pole
Dan Glass Glass		Fairbanks
Tammy Rowe		Fairbanks
Angela Norville		FBKS
Brett M Roberts		Fairbanks
Bruce Hamilton		FBKS
Talitha Roberts		FBKS
JOHN FOWL		Fairbanks
Brian Graham		Fairbanks
Deanna Fitzgerald		North Pole
Tyson Rivio		Fairbanks
Catherine E. Williams		North Pole
Troy D. Williams		North Pole
Troy O. Williams		North Pole
BARRY C. BOYD		FAIRBANKS
ROBERT C. MARTIN		FAIRBANKS
Julie Machacek		Fairbanks





Submitted By  
Russell Oswald  
Submitted On  
10/4/2013 10:06:18 AM  
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Resident

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Anchorage, Alaska 99504

The Unit 13 Tier I Caribou hunt (RC566) has a requirement to file the report within three days of the kill. Many of us are out in the field for a period of time that does not allow us to meet this requirement. I would like to suggest that this language be changed to "within three days after returning from the field".

I have questioned ADF&G about this and was told that they recognize this is an issue but that they do not anticipate penalizing the hunters for this. Given that there is recognition of a problem, it just seems to be a very simple "fix" to remove the appearance of being out of compliance with the stated permit requirements. It would put the hunters into compliance and not put ADF&G into a situation where they are forced to make this type of a call.



Submitted By  
Ryan Miller  
Submitted On  
12/14/2013 5:48:34 PM  
Affiliation

Proposal #44

I would like to see this proposal adopted, the unlimited pressure experiment has run it's course and it is time to start making changes to improve sheep hunting in Alaska. Im a lifelong resident and feel like the can has been kicked down the road far enough. You all know what needs to be done so please step up and take action.



Submitted By  
Scott Heidorn  
Submitted On  
12/11/2013 7:58:26 PM  
Affiliation

Greetings,

I am opposed to **PROPOSAL 117 - 5 AAC 92.540. Titled controlled use areas.** Reinstate the Nenana Controlled Use Area.

I do not own an airboat and it has been over 20 years since I rode in one.

I am opposed to this proposal for the following reasons. This proposal is an attempt by a group of public land users, to use you, the government, to restrict another groups use of public land. Also, it appears the only real issue or conflict being raised involves the interference to spot and stalk due to noise from other hunters. Apparently, non-moose hunters with airboats must not make any noise! I used to hunt in Minto Flats, where airboats were not allowed for moose hunting, and my spot and stalk hunting was disturbed daily by boats motoring up and down sloughs with someone standing in a crows nest 10 - 15 feet above the boat. Essentially moose hunting has become glorified road hunting and the constant drone of motor boats drowns out the subtle sounds moose make.

Unless the Board of Game is willing to prevent access to all users that generate sounds, irregardless of why/how it is being generated, the Board needs to reject this proposal.

Thank you for your time and consideration.



Submitted By  
Stephen Stidham  
Submitted On  
1/19/2014 7:39:45 PM  
Affiliation

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907-460-1008  
Email  
[stid2677@aol.com](mailto:stid2677@aol.com)  
Address  
900 Lakloey Drive  
North Pole, Alaska 99705

Please approve;

Proposal 44-5 AAC 85.055 Hunting Season and bag limits for Dall Sheep and 92.057 Special provisions for Dall Sheep drawing permit hunts.

**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.**



Submitted By  
Stephen Stidham  
Submitted On  
1/15/2014 10:54:11 AM  
Affiliation

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900 Lakloey Drive  
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I ask the BOG to please refuse prop 32 and 47 giving bowhunters a 10 day head start to hunt sheep before the general season opener of 10 Aug. I'm a certified bowhunter myself and still feel that this is not the answer to our states sheep mangament issues. I bowhunt because I choose to restrict myself to a limited range weapon and therefore to allow a 10 day advantage over the rifle hunters is unfair. There already exist a 10 mile wide bow only corridoor within the *Dalton Highway Corridor Management Area* for those bowhunters that want to bowhunt sheep.



Submitted By  
Stevan H White  
Submitted On  
1/30/2014 5:35:53 PM  
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Willow, Alaska 99688

This comment is for the McGrath area Proposal 59 to lengthen the season in Unit 21A for non-resident hunters. The data is complete now on the moose count and the numbers look great and support a longer season.

~~A survey was conducted in March 2013 and the current estimate of moose is 2442.

The bull to cow ratio is 77:100 (2011&2012).

There is a harvestable surplus of 98 moose.

The 5 year average harvest is about 30 moose/year and there is additional harvest available.

This count is also a very conservative estimate of the moose population since many of the moose in Unit 21A migrate down the Innoko River and winter on the islands in the Yukon delta.

Most of the non-resident hunters are brought in by us (Willow Air) and we do not intend to increase our numbers. We simply want our hunters to have the opportunity to hunt later when the bulls are more active. Most of our hunters now want to hunt until the last day which is Sept 20 so if we get bad weather many are late getting out of the field. With the longer season we could space our pickups out from the 21st thru the 26th alleviating the congestion on the 21st. Hunters would also be spaced out more and not all hunting at the same time. On our guided hunts, we are now doing two 8-day hunts since there is only a 16-day season. If we have much bad weather this is just not enough time. If we had the 21-day season like we had before, we would do two 10-day hunts, which leaves a couple more days for bad weather. We would not be doing any more guided hunters just making the hunts longer. With the number of hunters in Unit 21A and the current success rate, I believe the harvest would go up by approximately five mature bulls which is well within the 98 bull harvestable surplus. The 77 to 100 bull to cow ratio is also one of the highest I have seen. This also supports a longer season. Again, this would only affect mature, 50+ inch bulls. Thanks, Steve



Submitted By  
Steve Skjegstad  
Submitted On  
1/14/2014 2:32:06 PM  
Affiliation

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**PROPOSAL 115-5 AAC 85.045. Hunting seasons and bag limits for moose. Change the season dates and bag limit for moose in Unit 20C as follows:**

Unit 20C:

Resident moose season, spike fork or 50-inch antlers or three brow tines, September 1-25.

Nonresident moose season, September 1-25 one bull with 50-inch antlers or antlers with four brow tines, on at least one side.

**ISSUE:** Moose season in Unit 20C for residents and nonresidents. Currently, Unit 20C has six moose/square mile while across the rivers in Unit 20A and 20B densities are as high as 4.4 moose/square mile. Unit 20C has had some recent burns in the area and the Board of Game has allowed grizzly baiting. This should allow the moose population to grow to what it should be. However the long any bull season for residents targets all age groups and is more in line with a management plan that stabilizes or reduces the population. I believe a better strategy for this area at this time would be the spike fork, 50-inch strategy. the spike fork, 50-inch strategy is supposed to grow the moose population while increasing hunting opportunity for both meat and trophy hunters. Prior to the last Board of Game cycle, the nonresident moose seasons ended September 15 but was for any bull. If the board wants to stay with the 50-inch nonresident requirement, the season date should be changed to September 25.

**"OPPOSITION"** *I oppose the above proposed change.*

*First, please note the error in line one of this proposal. Moose density in Unit 20C is .6/square mile, not six/square mile.*

*It is my opinion that this plan is inconsistent with Fish and Game's Intensive Management of a subsistence area. Opportunity for resident hunters is decreased while increased for the nonresident and guide.*

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Targeting all age classes of bulls for the new longer hunting season may not have the desired effect of growing the population.

**"OPPOSITION"** *If nothing is done the same opportunities will exist as they have for years. If nothing is done, and given recent burns and grizzly baiting, assuming grizzly baiting results in more bear kills, then I would anticipate the moose population to grow slightly based on more browse and less predation. If nothing is done there will be fewer nonresident days of hunting which I believe will translate into fewer moose kills. If nothing is done we are more likely to maintain area harvest goals of 150-400 moose as 2012 stats show. If nothing is done the nonresident kill percentage will likely remain at 1.3% of the harvest as noted in 2012, down from 9% prior to imposing antler restrictions established by the BOG 2 years ago. If nothing is done then the same wonderful hunting opportunity for any bull will continue to be a joyous option.*

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** The proposed change is supposed to provide more moose and opportunity for meat and trophy hunters and increase the moose population in the area.

**"OPPOSITION"** *I think the best quality moose meat is that from a younger bull, typically smaller than the 50 plus inchers. I think the best quality moose meat is that which you can reliably put in your freezer. The year and a half old bulls that I've shot in Unit 20C have all had palmated antlers and would not have qualified under the spike fork regulation. This moose population is not stressed, maintains plenty of browse and as a result rarely develop spike fork antlers unlike other Units, and consequently would essentially limit harvest to 50 inch plus only bulls.*

**WHO IS LIKELY TO BENEFIT?** Hunters who want more moose whether they are trophy or meat hunters.

**"OPPOSITION"** *Those who will benefit will be the hunting guides and their clients. The guide and client would gain more hunting days, giving up nothing for this proposed change and the resident could stand to lose the any bull option that has been on the books for all time.*

**WHO IS LIKELY TO SUFFER?** Hunters who want to shoot any bull without worrying about antler size.



**"SUPPORT"** *I do agree that hunters that don't want to worry about antler size would suffer. That's me. I appreciate without the pressure of counting browtines, that's if your lucky enough for the moose look your way, or guestimating a seasoned hunter knows the value in taking a shot when it presents itself. Over the years I have let moose walk if I tines, trying to guess antler width is much riskier.*

*I can't think of a better way to discourage a young or inexperienced hunter than to impose antler restrictions in the mix. I have a teenager who would like to learn how to hunt moose and I also know that antler configuration could dampen an otherwise successful hunt.*

*The common method for accessing Unit 20C is with boat or airplane. Those without these means of transportation are restricted to hunting along the fringes of Unit 20C and would greatly reduce their chances of moose hunting success.*

**"OTHER SOLUTIONS CONSIDERED" .....**

*I would like to see the time honored management in place prior to the Board of Game change in 2012. I would like to see the resident moose hunting season September 1-20 and nonresident season run September 5-15. If it's not broke, don't try to change it. The last regulatory change that expanded the nonresident season to September 1-20 was proposed by a hunting guide. This proposal to expand the nonresident season is again proposed by a hunting guide. I think the old system of any bull for all hunters was a good system. I have friends who lived for many years in Alaska, now living outside, and nonresident family members, who will not come hunt with me because of the 50 inch/4 brow regulation which creates a very low probability hunt as compared to any bull.*



"WHERE THE TWO RIVERS MEET"



# TANANA TRIBAL COUNCIL

PO Box 130, Tanana, AK 99777

Phone: (907) 366-7160 or 7170 Fax: (907) 366-7195

COPY

Resolution Number 2013-24

**TOPIC:** Support for Hunting Protections on the New Road from Tanana to Manley

**SUBMITTED BY:** Tanana Manley Rampart Fish and Game Advisory Committee

**AUTHORS:** Tanana Manley Rampart Advisory Committee

**WHEREAS,** The proposed road from Manley to Tanana may bring some economic and other benefits to the community of Tanana; and

**WHEREAS,** The proposed road will also have a strong impact on existing subsistence patterns and practices, particularly with regard to subsistence hunting; and

**WHEREAS,** The community of Tanana may be proactive to minimize negative impacts on existing and traditional subsistence hunting patterns by considering how best to control the impact upon the community; and therefore let it be

**RESOLVED,** That the Tanana Tribal Council strongly supports and endorses the Tanana Rampart Manley Advisory Committee's proposal 121, specifically; Create a controlled use area, a corridor extending for two miles on either side of the new road to Tanana, in the area between the road's crossing the eastern boundary of Game Management Unit 20F at one end of the corridor, and at its confluence with the Yukon River at the western end. Within this controlled use area, there is to be no hunting with any use of wheeled or mechanized vehicles originating within the road corridor.

Resolution passed on this 30 day of October 2013

Chairmen Tanana Tribal Council Perhart Date 11/4/13



# TOZITNA, LIMITED

P.O. Box 129  
Tanana, Alaska 99777  
(907) 366-7255 • Fax: (907) 366-7122

## Resolution 13-03

### **A Resolution supporting Hunting Protections along the proposed Manley Hot Springs to Tanana road in Game Management Unit 20F.**

- WHEREAS** Tozitna, Ltd. is the legal Alaska Native Claims Settlement Act (ANCSA) village corporation for Tanana, Alaska; and
- WHEREAS** Tozitna, Ltd. has an elected nine member board of directors; and
- WHEREAS** The Board of Directors has authority to conduct business for Tozitna, Ltd.; and
- WHEREAS** Tozitna, Ltd. is the primary surface estate land owner surrounding the 16 mile section of proposed road ending at the South bank of the Yukon River six miles above Tanana; and
- WHEREAS** Tozitna, Ltd. recognizes that the State of Alaska's construction of a proposed new road to Tanana may bring socio-economic benefits and lowered transportation costs to the community of Tanana; and
- WHEREAS** The proposed road corridor will have major impacts on existing subsistence patterns and practices that currently exist within the community of Tanana; and
- WHEREAS** The residents of Tanana as represented by the ADF&G Tanana-Rampart-Manley Fish and Game Advisory Council, Tanana Tribal Council, City of Tanana, and Tozitna, Ltd. are determined to take a proactive course in minimizing negative impacts on existing local subsistence practices by considering best how to mitigate this impact on the community of Tanana; and

**NOW THEREFORE BE IT RESOLVED**, that Tozitna. Ltd. strongly supports the Tanana-Rampart-Manley Fish and Game Advisory Council's Proposal 121, to be considered by the Board of Game at their February 2014 meeting, which specifically creates, by ADF&G Regulation, a Controlled Use Area, a corridor extending for two miles on either side of the new Highway between Manley Hot Springs and Tanana, between the



eastern boundary of GMU 20F, and the Highway's western terminus at the Yukon River near Tanana. Within this Controlled Use Area of 20F, there is to be no hunting or retrieval of game with any use of wheeled or mechanized vehicles originating from within the designated Controlled Use Area for any resident or non-resident hunters. Creation of this Controlled Use Area is not to impinge upon existing hunting patterns inside the Controlled Use Area using boat access or snow machines, and supports continued opportunities for access on foot, so long as there is no use of motorized or wheeled vehicles originating from within that Controlled Use Area.

Adopted this 7<sup>th</sup> day of November 2013 by the Board of Directors of Tozitna, Ltd. in Tanana, Alaska, with a quorum present.

Signed on behalf of the Tozitna, Limited Board of Directors:

*Nina Heyano*

Nina R. Heyano, President

*Georjeana Wallace*

Georjeana Wallace, Secretary/Treasurer



IN REPLY REFER TO:

# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

1011 E. Tudor Road  
Anchorage, Alaska 99503-6199



FWS/OSM 14003.TF

**JAN 22 2014**

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

Dear Chairman Spraker:

The Alaska Board of Game is scheduled to meet February 14-23, 2014, to deliberate proposals concerning changes to regulations governing hunting and trapping of wildlife for the Interior Region. 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.

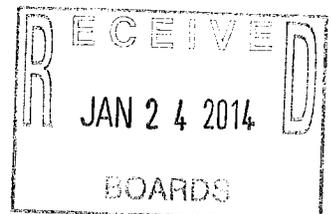
We appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues. Please contact Chris McKee, (907) 786-3572, or Trevor Fox, (907) 786-3400, with any questions you may have concerning this material.

Sincerely,

Eugene R. Peltola, Jr.  
Assistant Regional Director, OSM

Enclosure

- cc: Cora Campbell, Commissioner, ADF&G
- Tim Towarak, Chair, Federal Subsistence Board
- Kristy Tibbles, Board of Fish and Game Support, ADF&G
- Jennifer Yuhas, Federal Subsistence Liaison Team Leader, ADF&G
- Chuck Ardizzone, Wildlife Division Chief, OSM
- Interagency Staff Committee
- Administrative Record





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**RECOMMENDATIONS**

**ALASKA BOARD OF GAME PROPOSALS**

**Interior Alaska Region**

**February 14-23, 2014**

**Fairbanks, Alaska**

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



**Proposal 52 – 5 AAC 92.015(a)(4). Brown bear tag fee exemptions.** Reauthorize resident grizzly bear tag fee exemptions throughout Interior and Eastern Arctic Alaska.

**Current Federal Regulations:**

**§ 100.6 Licenses, permits, harvest tickets, tags, and reports.**

*(a) (3) Possess and comply with the provisions of any pertinent permits, harvest tickets, or tags required by the State unless any of these documents or individual provisions in them are superseded by the requirements in subpart D of this part.*

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

**Impact to Federal subsistence users/wildlife:** There would be no impact on brown bears if this proposal was adopted; however, there would be an increased cost for subsistence users harvesting a brown bear if the tag fee exemptions are not reauthorized.

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

**Rationale:** There are no known conservation concerns for brown bears in Interior or Eastern Arctic units. If this proposal is adopted it would continue the tag fee exemption, which eliminates the requirement that subsistence users must purchase a \$25 tag before hunting grizzly bears in these units. Retaining this tag fee exemption is particularly important in areas where there are few vendors and local economies are in a depressed state.

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**Proposal 65 - 5 AAC 85.055 Hunting seasons and bag limits for Dall sheep.** Establish a registration sheep hunt in Unit 19C from Oct.1–Apr.30 for residents of Unit 19C with a harvest limit of one sheep; excluding rams with larger than ¾-curl or broomed horns, lambs, or ewes accompanied by lambs. The season would be closed by emergency order when ten sheep are harvested, or prior to the quota being reached at the discretion of the area biologist.

**Current Federal Regulation:**

**Unit 19**

*1 ram with 7/8 curl horn or larger*

*Aug. 10–Sept. 20*

**Is a similar issue being addressed by the Federal Subsistence Board?** Yes. Proposal WP14-31, submitted by the Denali Subsistence Resource Commission, requests that a community winter hunt be established for rural residents of Nikolai for sheep within the Denali National Park and Preserve lands of Unit 19C from Oct. 1–Mar. 30, with a quota of 3 sheep; rams or ewes without lambs only. Additionally, the proposal requests the Denali National Park and Preserve Superintendent be delegated the authority to close the season by special action



when the sheep population is low. Proposal WP14-31 will be addressed by the Federal Subsistence Board at its April 2014 meeting.

**Impact to Federal subsistence users/wildlife:** The Federal Subsistence Board has not made a customary and traditional use determination for sheep in Unit 19, so all rural residents of Alaska may use sheep in the unit. Thus, residents of McGrath, Nikolai, Takotna, and Telida are a subset of Federally qualified subsistence users who would be provided an opportunity to harvest sheep during a more traditional time of the year, when areas with sheep can be accessed by snow machine or dog teams. Under current State and Federal regulations, harvest by residents of these communities has been low (6 rams reportedly harvested from 2005–2010).

Adverse impacts to the population would not be anticipated due to the restricted quota (10 sheep). In addition, the large rams that are harvestable under other State regulations would be protected, and additional limited harvest would be spread among the smaller ram classes and ewes without lambs.

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

**Rationale:** This proposal is one of two current options for State or Federal regulations that would provide a subset of Federally qualified subsistence users with additional opportunity to harvest sheep in Unit 19C. Federal Wildlife Proposal WP14-31 requests a community winter hunt for residents of Nikolai from Oct. 1–Mar. 30, with a quota of 3 sheep. Under current State and Federal regulations, the sheep harvest in Unit 19C by residents of these communities has been low, primarily due to accessibility issues.

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**Proposal 66 - 5 AAC 85.050. Hunting seasons and bag limits for musk oxen.** Create a musk oxen hunt in Units 18 and 19.

**Current Federal Regulation:**

- Unit 18 – No Federal season*
- Unit 19 – No Federal season*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 29, 2015

**Impact to Federal subsistence users/wildlife:** There would be no impact to Federally qualified subsistence users as there is no Federal subsistence priority for muskox in either Unit 18 or Unit 19. However, a proposal could be submitted to the Federal Subsistence Board to create a Federal hunt in these units. The impact to the muskox population is uncertain as there are no current estimates of numbers for the species in the units in question outside of Nunivak and Nelson Islands.



**Federal Position/Recommended Action:** The OSM recommendation is **neutral** on this proposal.

**Rationale:** There are currently no Federal seasons for musk ox in Units 18 and 19. However, most of the area in question is on Federal public land. If this hunt is established and the Federal Subsistence Board receives an equivalent proposal, a closure of Federal lands to all non-Federally qualified users is possible to provide a subsistence priority.

**Proposal 67 - 5 AAC 92.450. Description of game management units.** Modify the boundaries for Units 18, 19, and 21.

**Current Federal Regulations:**

*§ .26 Subsistence taking of wildlife.*

*(i) Unit regulations.*

*(18) Unit 18 consists of that area draining into the Yukon and Kuskokwim Rivers downstream from a straight line drawn between Lower Kalskag and Paimiut and the drainages flowing into the Bering Sea from Cape Newenham on the south to and including the Pastolik River drainage on the north; Nunivak, St. Matthew, and adjacent islands between Cape Newenham and the Pastolik River.*

*(19) Unit 19 consists of the Kuskokwim River drainage upstream from a straight line drawn between Lower Kalskag and Paimiut*

*(21) Unit 21 consists of drainages into the Yukon River upstream from Paimiut to, but not including, the Tozitna River drainage on the north bank, and to, but not including, the Tanana River drainage on the south bank; and excluding the Koyukuk River drainage upstream from the Dulbi River drainage.*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 29, 2015.

**Impact to Federal subsistence users/wildlife:** Changes to unit boundary descriptions could result in confusion for Federally qualified subsistence users, since the proposed changes would differ from Federal boundary descriptions. Changes in boundaries would have no effect on wildlife populations.

**Federal Position/Recommended Action:** The OSM recommendation is **neutral** on this proposal.



**Rationale:** If these changes are adopted by the Board, the Federal Subsistence Board would need to make changes to Federal regulations to match them. At this time, there are no proposals before the Federal Board to make similar boundary changes. Differences between State and Federal boundaries for these units could lead to regulatory complexity for Federally qualified subsistence users, who can hunt under either State or Federal regulations.

**Proposal 68 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Change the Unit 21D moose permit hunt, DM818, to a general hunt.

**Current Federal Regulation:**

**Unit 21D, remainder—Moose**

<i>Unit 21D, remainder—1 moose; however antlerless moose may be taken during the Sept. 21–25 and the Mar. 1–5 season if authorized jointly by the Koyukuk/Nowitna National Wildlife Refuge Manager and the Central Yukon Field Office Manager, Bureau of Land Management. Harvest of cow moose accompanied by calves is prohibited. During the Aug. 22–31 and Sept. 5–25 seasons, a State registration permit is required. During the Mar. 1–5 season a Federal registration permit is required. Announcement for the antlerless moose seasons and cow quotas will be made after consultation with the ADF&amp;G area biologist and the Chairs of the Western Interior Regional Advisory Council and the Middle Yukon Fish and Game Advisory Committee.</i>	<i>Aug. 22–31</i>
	<i>Sept. 5–25</i>
	<i>Mar. 1–5 season to be announced</i>

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 29, 2015.

**Impact to Federal subsistence users/wildlife:** The proposed regulatory change could result in increased competition for Federally qualified subsistence users hunting moose in the affected portion of Unit 21D. The proposed change could also lead to higher harvest rates of large bulls, as harvest tickets would be readily available and hunters would not be required to destroy the trophy value of harvested bulls.

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

**Rationale:** State residents currently have the option to acquire registration permit RM834 to hunt the area, but must destroy the trophy value of a harvest bull. State regulations were gradually changed from general moose hunts in Unit 21D to a combination of limited drawing permits and subsistence registration permits to reduce the number of hunters and moose harvested in the area.



**Proposal 70 - 5 AAC 85.045(22). Hunting seasons and bag limits for moose.** Retain the winter registration moose hunt in Unit 24B (RM833).

**Current Federal Regulation:**

**Unit 24B—Moose**

<i>Unit 24B—All drainages of the Koyukuk River downstream from and including the Henshaw Creek drainage—1 antlered bull by Federal registration permit.</i>	<i>Aug. 25—Oct. 1</i>
<i>Federal public lands in the Kanuti Controlled Use Area, as described in Federal regulations, are closed to taking of moose, except by Federally qualified subsistence users of Unit 24, Koyukuk, and Galena hunting under these regulations.</i>	<i>Dec. 15—Apr. 15 (until Jun. 30, 2014)</i>

**Is a similar issue being addressed by the Federal Subsistence Board?** Yes. Proposal WP14-29 also requests that the winter moose season be retained in Unit 24B under Federal regulations. The Federal Subsistence Board will address the wildlife proposal at its April 2014 meeting.

**Impact to Federal subsistence users/wildlife:** If adopted, the proposed regulations would continue to provide users, including Federally qualified subsistence users, the opportunity to harvest moose in the winter (Dec. 15–Apr. 14) under State regulations in Unit 24B remainder. Federal public lands in the Kanuti Controlled Use Area of Unit 24B are closed to the harvest of moose, except by Federally qualified subsistence users hunting with a Federal registration permit; thus, continuation of the winter season on Federal public lands in that portion of the hunt area is contingent on action by the Federal Subsistence Board on Proposal WP14-29.

Continuing the winter season should not adversely impact the moose population in Unit 24B, as the population has been able to sustain the recent harvest level associated with the fall and winter seasons. In addition, continuing to restrict the harvest to antlered bulls protects cows from being incidentally harvested.

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

**Rationale:** Hunters typically experience low moose encounter rates in Unit 24B due to the low density of moose. Adopting the proposal would continue to provide opportunity for users to harvest moose in the winter, which can be important for those users who were unsuccessful during fall hunts.

**Proposal 71 - 5 AAC 92.540(8)(b). Controlled use areas.** Modify the Kanuti Controlled Use



Area boundaries to the original dimensions.

**Current Federal Regulation:**

**Unit 24—Kanuti Controlled Use Area Description**

*You may not use aircraft for hunting moose, including transportation of any moose hunter or moose part in the Kanuti Controlled Use Area, which consists of that portion of Unit 24 bounded by a line from the Bettles Field VOR to the east side of Fish Creek Lake, to Old Dummy Lake, to the south end of Lake Todatonten (including all waters of these lakes), to the northernmost headwaters of Siruk Creek, to the highest peak of Double Point Mountain, then back to the Bettles Field VOR; however, this does not apply to transportation of a moose hunter or moose part between publicly owned airports in the controlled use area or between publicly owned airport within the area and points outside the area.*

**Unit 24B—Moose**

*Unit 24B—that portion within the John River drainage— 1 moose. Aug. 1–Dec. 31*

*Unit 24B—All drainages of the Koyukuk River downstream from and including the Henshaw Creek drainage—1 antlered bull by Federal registration permit. Aug. 25–Oct. 1  
Dec. 15–Apr. 15  
(until Jun. 30, 2014)*

*Federal public lands in the Kanuti Controlled Use Area, as described in Federal regulations, are closed to taking of moose, except by Federally qualified subsistence users of Unit 24, Koyukuk, and Galena hunting under these regulations.*

*Unit 24B, remainder—1 antlered bull. A Federal registration permit is required for the Sept. 26–Oct. 1 period. Aug. 25–Oct. 1  
Federal public lands in the Kanuti Controlled Use Area, as described in Federal regulations, are closed to taking of moose, except by Federally qualified subsistence users of Unit 24, Koyukuk, and Galena hunting under these regulations.*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 29, 2015.

**Impact to Federal subsistence users/wildlife:** If adopted, the proposed regulations would reduce regulatory complexity for Federally qualified subsistence users. Competition between Federally qualified subsistence users and users hunting moose under State regulations would not be affected, as Federal public lands within the Kanuti Controlled Use Area, as defined in Federal regulations, are closed to the harvest of moose, except by Federally qualified subsistence users.



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

**Rationale:** Alignment of the Kanuti Controlled Use Area will reduce regulatory complexity, which benefits all users.

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**Proposal 77 – 5 AAC 92.450(26)(B) Description of game management units.** Clarify the subunit boundary between Unit 26B and Unit 26C. Add additional language in subunits to clarify that the area described is not stand alone language, but within the larger unit boundaries as follows:

**5 AAC 92.450(26)(B)** Unit 26(B) consists of that portion of Unit 26 east of Unit 26(A), and west of a line **following** the west banks of **the Staines River branch of the Canning River**, the Canning River and [WEST OF THE WEST BANK OF] the Marsh Fork of the Canning River.

**Current Federal Regulations:**

*Unit 26A - consists of that portion of Unit 26 lying west of the Ikillik River drainage and west of the east bank of the Colville River, between the mouth of the Ikillik River and the Arctic Ocean.*

*Unit 26B - consists of that portion of Unit 26 east of Unit 26A, west of the west bank of the canning River and west of the west bank of the Marsh Fork of the Canning River.*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 29, 2015.

**Impact to Federal subsistence users/wildlife:** If adopted, this proposal would clarify the boundary between Units 26A and 26B under State regulations, which could reduce confusion for any users hunting under those regulations. However, the clarified boundary would add regulatory complexity for Federally qualified subsistence users because the boundaries would be misaligned between Federal and State regulations.

**Federal Position/Recommended Action:** The OSM recommendation is **neutral** on this proposal.

**Rationale for comment:** If the proposal is adopted, the Federal Subsistence Board would need to take parallel action to align the boundaries between Unit 26A and Unit 26B under Federal regulations for this regulatory change to be effective.

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**Proposal 79 – 5AAC 85.045. Hunting seasons and bag limits for moose.** Create new hunt area for moose in Unit 25A.



**Current Federal Regulations:**

*Unit 25A – 1 antlered bull*

*Aug. 25 – Sept. 25*

**Is a similar issue being addressed by the Federal Subsistence Board?** Yes. Proposal WP14-48 requests creation of a new hunt area for moose in Unit 25A in a portion of the Sheenjek River drainage and Coleen and Old Crow River drainages. The Federal Subsistence Board will consider this proposal at its April 2014 meeting.

**Impact to Federal subsistence users/wildlife:** If this proposal is adopted, it should have a minimal impact on Federally qualified subsistence users as historical harvest by local users has been low. Moose numbers have declined in the Coleen and Sheenjek River drainages over the last 20 years, but bull:cow ratios show that there is still a surplus of bulls available for harvest.

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

**Rationale:** Although the moose population in the Sheenjek and Coleen River drainages has declined in the last two decades, composition surveys show there is still a surplus of bulls for harvest in the area, so hunting is unlikely to be a limiting factor to population growth. Moose habitat in the area is limited and predation may be serving to maintain moose numbers at low densities. The moose found in the Sheenjek and Coleen River drainages are thought to be part of a larger overall population that includes animals in the Firth, Mancha, and Kongakut River drainages in Unit 26, where recent surveys have shown increased numbers of moose.

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**Proposal 80 – 5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures.** Allow brown bears to be taken at black bear stations in Unit 25D.

**Current Federal Regulations:**

**Black Bear**

*Unit 25D – 2 bears every regulatory year*

*Aug. 10 – June 30*

*(iii) Unit-specific regulations*

*(A) You may use bait to hunt black bear between April 15 and June 30 and between August 1 and September 25; you may use bait to hunt wolves on FWS and BLM managed lands.*

**Currently harvesting a brown bear over bait is not allowed under Federal regulations in any unit.**



**Is a similar issue being addressed by the Federal Subsistence Board?** Yes. Proposal WP14-50 requests that brown bears be allowed to be hunted over bait in Unit 25D. The Federal Subsistence Board will consider this proposal at its April 2014 meeting.

**Impact to Federal subsistence users/wildlife:** If this proposal is adopted, it would provide increased opportunities for Federally qualified subsistence users to harvest brown bears in Unit 25D. The effect of the proposal on brown bear populations in the unit is difficult to predict given that the latest population estimates for the species in Unit 25D are now 20 years old.

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

**Rationale:** Brown bear population estimates for Unit 25D are now 20 years old and based on extrapolations from studies done in the 1980s and 1990s. Thus, it is difficult to predict what the effect of allowing baiting for the species would be. Population trends are being estimated based on harvest, which is problematic for a variety of reasons. Bear baiting is an efficient method of hunting and would likely lead to an increase in hunting success versus the “spot and stalk” hunting method now used. In addition, the harvest limit in Unit 25D was recently doubled under Federal regulations and there is a preponderance of underreporting of harvest in Unit 25. A conservative approach to an increase in harvest for this species is warranted prior to the initiation of more efficient methods of harvest such as baiting.

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**Proposal 85 – 5 AAC 85.025. Hunting seasons and bag limits for caribou.** Establish a Tier I registration permit for Nelchina caribou in Unit 12.

**Current Federal Regulation:**

*Unit 12 remainder – 1 caribou may be taken by a Federal registration permit during a winter season to be announced. Winter season to be announced.*  
*Dates for a winter season to occur between Oct. 1 and Apr. 30 and sex of animal to be taken will be announced by Tetlin National Wildlife Refuge Manager in consultation with Wrangell-St. Elias National Park and Preserve Superintendent, Alaska Department of Fish and Game area biologists, and Chairs of the Eastern Interior Regional Advisory Council and Upper Tanana/Fortymile Fish and Game Advisory Committee.*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 29, 2015.



**Impact to Federal subsistence users/wildlife:** Establishment of a Tier I hunt during the winter season could lead to increased competition between Federally qualified subsistence users and other state residents. The Nelchina Caribou Herd is still within the ADF&G management objectives, but the hunt for this herd was recently closed by emergency order in April of 2013 due to unanticipated high winter mortality.

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

**Rationale:** If adopted, this proposal could lead to increased competition for Federally qualified subsistence users if other state residents are allowed to hunt during the winter season under Tier I. There are no other nearby caribou hunts available to local residents. The area addressed in the proposal is road accessible. Adopting this proposal and establishing this hunt could serve to focus hunting in an area that is currently only open to Federally qualified subsistence users during a to-be-announced winter season.

**Proposal 118 – 5AAC 85.045. Hunting and bag limits for moose.** Change the season dates for moose hunting in Unit 20F.

**Current Federal Regulation:**

*Unit 20F – that portion within the Dalton Highway Corridor Management Area – 1 antlered bull by Federal registration permit only. Sept. 1 – 25*

*Unit 20F, remainder – 1 antlered bull Sept. 1 – 25 Dec. 1 – 10*

**Is a similar issue being addressed by the Federal Subsistence Board?** Yes. Proposal WP14-44 requests a five day extension of the moose season in Unit 20F remainder from Sept. 1–25 to Sept. 1–30. The Federal Subsistence Board will consider this proposal at its April 2014 meeting.

**Impact to Federal subsistence users/wildlife:** If this proposal is adopted, it would create a longer season, providing additional opportunity for Federally qualified subsistence users to harvest moose during potentially cooler temperatures later in the season, thereby helping to minimize meat spoilage in the field. Adding additional days to the existing season should not have an effect on the moose population.

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



**Rationale:** Adopting this proposal would shift the fall moose season in Unit 20F to start 10 days later. Shifting the season may help Federally qualified subsistence users harvest moose later in the season, thereby reducing the risk of meat spoilage associated with the warmer temperatures that rural users have experienced in recent years. The moose population should not be adversely effected by this short extension of the season as harvest pressure has been relatively low in the subunit.

**Proposal 119 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Change the season dates for winter moose season in Unit 20F.

**Current Federal Regulation:**

<i>Unit 20F – that portion within the Dalton Highway Corridor Management Area – 1 antlered bull by Federal registration permit only.</i>	<i>Sept. 1 – 25</i>
<i>Unit 20F, remainder – 1 antlered bull</i>	<i>Sept. 1 – 25 Dec. 1 – 10</i>

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 29, 2015.

**Impact to Federal subsistence users/wildlife:** This proposal would create a longer winter season for Federally qualified users, which would provide more hunting opportunities. Hunting pressure on moose in the unit continues to be lower than in other adjacent areas, most likely due to the difficult access of the area.

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

**Rationale:** Moose harvest in Unit 20F continues to be lower than expected relative to other areas of Unit 20. An additional five days of hunting would allow for increased opportunities for Federally qualified subsistence users; however, there is no population data for moose in Unit 20F and harvest will most likely increase when the Tofty-to-Tanana road is completed. This improved access will most likely attract a high number of hunters that the area does not currently experience. An extension of the winter season, combined with the potential for improved access and lack of population data in this unit could lead to an overharvest of moose.



# United States Department of the Interior

FISH AND WILDLIFE SERVICE  
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December 26, 2013

Chairman Ted Spraker  
Alaska Board of Game  
Boards Support Section  
P.O. Box 115526  
Juneau, Alaska 99811

Dear Chairman Spraker:

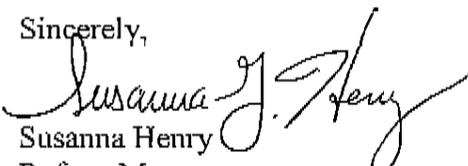
The Togiak National Wildlife Refuge (Togiak Refuge) appreciates the opportunity to comment on proposals to be considered by the Alaska Board of Game during its upcoming meeting. Our recommendations on Proposals 7 and 132, which could affect the management of wildlife populations on Togiak Refuge and adjacent lands in Units 17 and 18, are below.

Proposal 7 would shift the hunting season two weeks later for wolverines in Unit 18. Togiak Refuge is opposed to this proposed change as female wolverines with dependent young would likely be more vulnerable to harvest in April. This would also create an inconsistent end date with the federal wolverine hunting season, which should be avoided.

Proposal 132 would reauthorize the existing winter hunt for antlerless moose in Unit 17A. Togiak Refuge supports this proposal. It is consistent with the Unit 17A Moose Management Plan which allows for antlerless moose harvest when the population trend is stable or increasing and above 600 moose. The most recent survey in March 2011 found a minimum of 1,166 moose. Calf recruitment to radio-collared cows and adult female survival since the March 2011 survey suggest this population is still increasing.

Thank you for the opportunity to comment on these proposals and for taking the time to consider our comments.

Sincerely,

  
Susanna Henry  
Refuge Manager



Submitted By  
Wesley Hopwood  
Submitted On  
10/21/2013 9:43:53 PM  
Affiliation

Support of Proposal 94-5AAC 85.025

I hunted caribou on the Macomb Plateau during August 2013. Though my group of 3 hunters saw ~100 caribou we only found one small bull which we were fortunate to harvest. The temperatures were around 80. We were able to find a small remaining snow bank or else the quality of the meat would have been compromised. We saw several other hunting parties and one other hunter harvested a young bull similar to mine, most were unsuccessful. I think that the area provides a good challenge for walk-in hunters but the current season is not conducive to harvesting bulls in the area.



William and Betty Maness

December 30, 2013

Box 90

Bettles, Alaska 99726

907-399-7346

This is about the proposal submitted by the Koyukuk River Fish and Game Advisory Committee, proposal 71-5AAC 92.540(8)(b).

We had this changed at the last board of game meeting and to our knowledge there has not been any complaints about moose hunting in the area with aircraft. We inquired with the local air taxis in Bettles and that would be with Linda Klaes of Bettles Air Service and Judy Jespersen of Brooks Range Aviation and they do not fly moose hunters into the Kanuti Flats. We have hunted there every year and have not seen any moose hunting with airplanes either. The Kanuti Flats are either privately owned posted land with Doyon or Evansville, and on the federal wildlife portions of it you have to be a resident of that area to hunt moose there.

If this law is changed back to the way it was, we will not be able to hunt moose with a boat or airplane there from our cabin again, as told us by Mike Spindler, because we might eat off of a fork we had flown in twenty years ago. We changed the law because our cabin sits on the line just in the Kanuti controlled use area. It was quite a job to change this regulation and at the final vote it was 7 for and 0 against changing the boundaries.

William and Betty Maness

*Betty Maness*

*William A. Maness*