

**Alaska Board of Game  
On-Time Public Comment Index  
Statewide Meeting March 14-18, 2014**

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Submitted By  
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Submitted On  
2/27/2014 11:19:24 AM  
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I urge you to vote YES, on the Black Bear Snaring, as it is "EXTREMELY SICK, and BARBARIC. We are MURDERING/SLAUGHTERING way too much Wildlife. And I am horribly sick of it. Is there NOT a COMPASSIONATE, EMPATHETIC bone/HEART in any of your Bodies? For those of us who love to witness the BEAUTY of Wildlife "SURVIVING", "FLOURISHING" instead of taking pictures of MUTILATED, ABUSED, and TORTURED Carcasses, we are saddened and sickened to be witness'es of your Neanderthalic ways. I am very confused at why you call what you do a "Sport". Go play Football, Basketball, Tennis, or Golf, as those are "ACTUAL" Sports!!! Just dont understand one bit!!! PLEASE STOP!!! and vote YES on Balck Bear Snaring, because its MURDER!!!!



February 27, 2014

Alaska Dept. of Fish & Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 998115526

To Administrative Staff:

Attached is Ahtna Tene Nene' Customary & Traditional Use Committee's comments on the additional proposals added to the 2014 Statewide ABOG Meeting on March 14-18, 2014 Alaska Board of Game meeting in Anchorage, Alaska.

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

Sincerely,

*Rosie Slickman*  
for  
*Roy S. Ewan, Chairperson*  
Roy, S. Ewan, Chairperson



Proposal 178 – AAC 92.200. Purchase and sale of game. Prohibit the commercial barter of game or their parts taken for subsistence uses as follows:

Amend 5 AAC 92.200 *Purchase and sale of game* (b) by adding a new section to read:

**(4) The following individuals and businesses are prohibited from engaging in the barter of game or their parts taken for subsistence uses:**

**(A) an individual or business holding a license under 43.70 or AS 43.75, or their Alaska resident employee, to engage in the commercial sale of the food items or nonedible items provided by the barter exchange; and**

**(B) An individual or business holding a license under AS 43.70 or AS 43.75, or their Alaska resident employee, to engage in providing the services provided by the barter exchange.**

**(5) for purposes of this subsection, in addition to the definitions in AS 16.05.940, in 5 AAC 01-5 AAC 02, and in 55 AAC 84-5 AAC 92, unless the context requires otherwise, “noncommercial” means not for profit or disposal in commercial channels.**

Comments:

We support Proposal 178 to change AAC 92.200., Purchase and sale of game to prohibit an individual or businesses holding a license or their commercial Alaska resident employee, to engage in the commercial sale of the food items or nonedible items provided by the barter exchange, or to engage in providing the services provided by the barter exchange.

Revising this regulation will to prevent individual(s) and businesses' that hold a license to make a profit from bartering game or their parts for services provided to customers. Passing this proposed regulatory change, potential abuse of the system by individual(s), and business' or their employees selling wild game or their parts for monetary game will be curtailed and avoided in the future.

Clarifying regulation will also help enforcement to enforce regulations on bartering of game and their parts. Exactly what is meant by “noncommercial” will be definitive in regulations. Clarification of “noncommercial” in 5 AAC 92.200 will provide the public and enforcement clear, understandable regulation.



**Page 2 of 25 AAC 92.080. Unlawful methods of taking game; exceptions.** The following methods of taking game are prohibited.

**(7)** With the aid of a pit, fire, artificial light, laser sight, electronically enhanced night vision scope, any device that has been airborne, controlled remotely and used to spot or locate game with the use of a camera or video device, radio communication, cellular or satellite telephone, artificial salt lick explosive, expanding gas arrow, bomb, smoke, chemical (excluding scent lures), or a conventional steel trap with no jaw spread over nine inches, except that...

Comments:

We support Proposal XXX, to prohibit the use of taking game with remote controlled airborne devices. Remote controlled drones may be used to spot a moose, caribou or sheep and other big game. An Abuse of this type of hunting could occur, causing harm to the moose, caribou and wild game populations. Unethical hunting will occur; hunters will have an advantage while hunting wild game. A few hunters would practice this kind of unfair, unethical, method of hunting. Fair chase involved in hunting big game will be eliminated by a few unethical hunters.



# The Alaskan Bowhunters Association, Inc.

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PC03 1 of 7

ATTN: Board of Game Comments  
 ADF&G Boards Support Section  
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The Alaskan Bowhunters Association Comments for  
 Board consideration Statewide meeting  
 Anchorage March 14-18, 2014

## **Prop 133: to require IBEP Certification for all bowhunting** **Do Not Support**

By individual Len Malmquist, IBEP Instructor & ABA Board member.  
 Nice concept but not supported by the ABA as a whole.

Our Concerns:

- May be an obstacle to new bowhunters
- Difficult to provide sufficient classes statewide.
- No similar requirement for hunters in general
- ? what to do with crossbow hunters? Many regular bowhunting instructors are reluctant to teach crossbow hunters.

## **Prop 134: to align IBEP Certification for Black & B/G bear** **bait.**

**Support option #1 or #2**

**Do NOT support option # 3**

By ADF&G three options to align and simplify regulations

1. Remove IBEP Cert for all bear taken over bait Statewide
2. Align requirement for B/G bear with black bear units 7, 14-16
3. Require IBEP for all bear taken over bait statewide

Dedicated To Fostering And Perpetuating Fair Chase Hunting With The Bow & Arrow



ABA would support either option #1 or #2. We would oppose #3 for same reasons as #133 above.

When black bear baiting was under attack and ADF&G was reviewing the regulations there was considerable concern and arguments by anti-hunters regarding the public image of bearbaiting. The Alaskan Bowhunters Association working with ADF&G and the BOG came up with the regulations for requiring IBEP Certification for units in the road system. The idea was that more education would reduce conflicts and complaints in the more publicly accessible areas. We were also concerned about our ability to deliver the education in remote parts of Alaska.

### **Prop 159: remove meat salvage requirement for B/G Bear taken at a bait site.**

#### **Support**

By an individual Joel Donner. However reportedly this regulation was an inadvertent development when the Board of Game passed a regulation allowing the take of B/G bear at bait sites in some units. The actual implementation of the regulations came out with the requirement to salvage the meat of B/G bear taken at a bait site. Historically and in current practice there is no requirement to salvage the meat of B/G bear except in certain "Subsistence" hunts. This regulation makes no sense and has been inhibiting hunters from killing B/G bear at bait sites. This is contrary to the Board of Game's objectives of increasing the harvest of B/G bear in certain units.

### **Prop 173: to modify the definition of "Bag Limit" and define "Mortally Wounded"**

#### **Support**

By the Alaskan Bowhunters Association  
Currently definition of Bag limit includes the word "Take".  
Websters dictionary has over 50 definitions of the word Take.  
It is our understanding that the BOG can change the definition of "Bag Limit" but only the legislature can change the definition of "Take".  
We are requesting BOG to change the definition of Bag Limit to mean the maximum number of a species that a person can "harvest".  
We also would like to see definitions for "harvest", "wound" and "mortally wounded".



Our proposal is slightly misprinted in the proposal book. Proposal number 173 should read:

"Bag Limit- the maximum number of animals of any one game species a person may [TAKE] **harvest** in the unit or portion of a unit in which the [TAKING] **harvesting** occurs. Animals disturbed in the course of legal hunting do not count toward the bag limit. **Animals known or believed to be mortally wounded and lost may count against the bag limit for certain species in some units.**"

We would like to see the definition of "**harvest**" to be "**kill and reduce to a hunters possession**".

We would like to see the definition of "**mortally wounded**" to be "**an animal struck with a hunting projectile which dies or is reasonably expected to die as a direct result of being struck with that hunting projectile.**"

This is an issue, which has been going on for over ten years. Still under the definition of "Take" simply "attempting to pursue" would constitute taking.

There is no biologic justification for the current regulations that specify that any "wounded" animal in some units must be counted against the bag limit regardless of how superficially it is wounded.

The current regulations reward unethical hunters and punish ethical hunters. Please read the attached article entitled "**Hit but Lost**" **Published in Bow and Arrow Hunting Magazine, June/July 2007** for additional perspective on this problem.

Thank you for your consideration of our remarks,

John D Frost - Legislative VP of the Alaskan Bowhunters Association



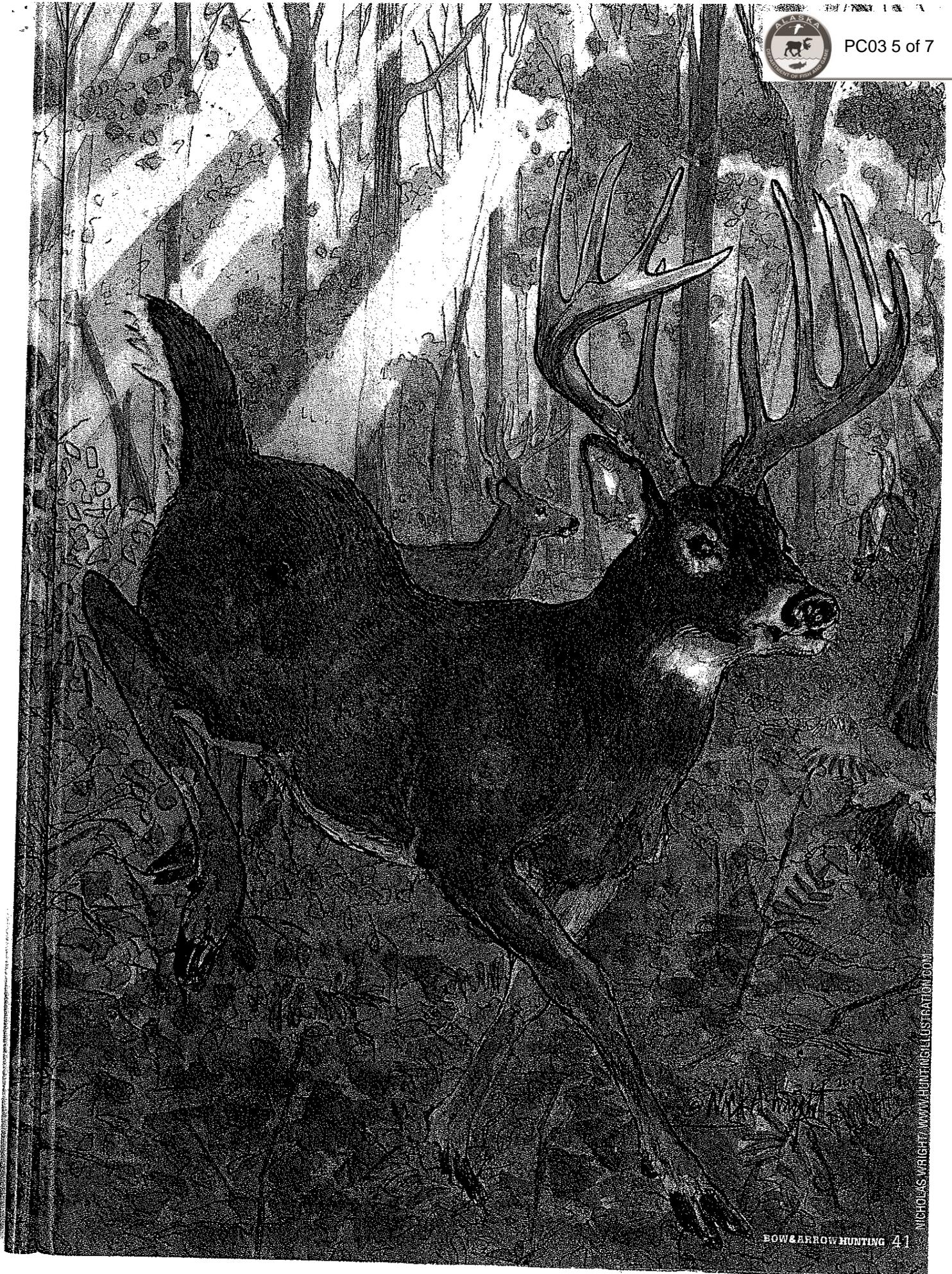
# Hit but LOST

An expert's view on the laws, rules and ethics of wounding

By Jack Frost

70 BOW & ARROW HUNTING

Bow & Arrow Hunting Magazine (4) June/July 2007 Pg 40



NICHOLAS WRIGHT / WWW.HUNTINGILLUSTRATION.COM



## Join me on a few hunts that we all wish had turned out differently.

**D**ecember, late archery season with 4 inches of snow on the ground; the old doe slips cautiously past your treestand. She has lived through several archery and firearms seasons and is constantly alert. You draw as she walks behind an evergreen tree. She stops, broadside, alert at 20 yards. At your shot, she bounds off and you believe you clearly see your arrow go over her. Later, when you get down to retrieve your arrow, you find some cut back hair in her tracks and a smear of blood on the fletching of your arrow. You follow her tracks in the snow and over the first 100 yards, find about a dozen drops of blood and then nothing more. After

slightly toward you. Your arrow hits solid bone on his shoulder with a loud "whack!" and you see very little penetration. The bear wheels and crashes off through the alders. After waiting several hours and getting back-up help, you and the guide cautiously follow the fairly good blood trail for nearly a mile. Then, after the second bed, there is no more blood and no indication of which way the bear went.

Alaska in October, and a billy goat is lying broadside on a ledge. He is 45 range-found yards away and your shot is a perfect double-lung hit. He staggers to his feet and, with the incredible toughness for which goats are known, staggers nearly 100 yards before plunging off a precipice and falling 1,000 feet into a glacial river below. He is washed away and never seen again.

In Africa, you are sitting in a hide at a water hole, when a \$4,000 (trophy fee) sable comes in to drink. It

from a previous season.

Indeed wild animals suffer many natural injuries in the normal course of rutting activities: fighting for dominance or getting poked by a barbed wire fence or a sharp stick while running through the woods. Animals can, and do recover from injuries. Superficial clean cuts from broadheads are especially likely to heal with no residual impairment of the animal.

The National Bowhunter Education Foundation teaches that recovery of wounded animals is a bowhunter's most important responsibility. All serious, ethical bowhunters that I know agree with this belief. When an animal has been hit, you must do everything in your power to retrieve it.

However, as in the examples above, there are times when the animal escapes in spite of everything that we can do. These examples may run the entire range—from animals so lightly wounded that they are not affected in any way, to animals clearly mortally wounded and lost.

Depending on where you are hunting, laws, landowner or guide rules, local customs and general hunting ethics may vary. Obviously it is your responsibility to know and observe all laws. This is not always easy in foreign countries and states and, to some extent, you must rely on what your guide tells you. However, you are ultimately responsible.

If the local rules of your guide or the landowner say that any animal on which there is any sign of blood must be considered taken, then you must know and abide by those rules. This is generally the case in most of Africa and Europe. Often times in those countries, if you hit an animal, your hunt is over and you pay the trophy fee, regardless of whether the animal is recovered or not. It is also generally the rule anywhere the animals are considered to be privately owned. It is just good business if you can charge two or more hunters trophy fees on the same animal. Also guides with more interest in the fees to be

## "Superficial clean cuts from broadheads are especially likely to heal with no residual impairment of the animal."

following her walking tracks for another 200 yards, you find that she is feeding on acorns.

The peak of the rut is November and, during this time when it is just getting dark, a nice buck comes by. Walking slowly, he passes within 15 yards. You shoot and hear a dull, hollow "thunk" instead of the click of an arrow hitting ribs. He humps up and walks off slowly. Wisely, you wait until the next morning to track him, but it rains during the night and you find no trail in the morning. Extensive ground search over the next few days fails to find the deer.

It's Alaska in September, and you are hunting brown bear in thick brush on a salmon stream. A nice bear comes splashing up the stream and draws broadside at about 25 yards. "Shoot!" your guide urgently whispers. As you come to full draw, the bear turns just

is incredible how quickly he whirls at the sound of the bowstring. Your arrow then skirts by his brisket. There is only blood on one blade and a smear on one of the fletching. Your PH and the government game tracker say the animal is essentially unharmed, but you still owe the trophy fee.

Unfortunately, as much as we hate to admit it, there are various scenarios where an animal is struck with an arrow and not recovered. In The Fort Ripley Wounding study done 10 years ago there was a 13 percent un-recovered wounded rate. This is actually a far lower rate than has been reported by anti-hunting groups' propaganda. It is not certain that any of those deer died. Some were probably lightly wounded and survived. There are numerous stories of animals being harvested with completely healed arrow wounds



generated from the hunt than with your success are happy to quit early and not have the work of caring for a trophy if you wound an animal. This may be shortsighted, as they may not get much return business.

This generally has not been the policy in North America. Here, we are ethically encouraged to diligently continue attempting to recover any animal believed to have been mortally wounded. Ethical hunters will leave no stone unturned to try to find an animal that they have hit solidly in the body cavity. Hunters will continue to hunt for that specific animal and will not try to shoot another animal, even after they have essentially given up all hope of recovery. Hunters will finish their season or hunt looking for that animal. If on a guided hunt, hunters will insist that their guides use every means at their disposal to help find the animal.

However, a lightly wounded or nicked animal in North America is another consideration. A 2-inch cut, 1/2-inch deep across an animal's back or brisket is nothing more than a valuable lesson to an animal to pay more attention when walking past a treestand. An animal will be more alert and less likely to be harvested than if it had never been shot at. A superficial cut does not remove an animal from the population and has no biologic effect. Therefore, a superficially wounded animal should not be counted against a person's bag limit.

Bowhunters, compared to gun hunters, are at a disadvantage when it comes to rules that say a wounded animal must be considered to be taken, regardless of how lightly it is wounded. This is because we shoot at short ranges with projectiles that we can see fly, and that we usually recover and inspect after we have shot. We are therefore more likely to know that we have superficially wounded an animal than is a rifle hunter who shoots at longer ranges with an invisible projectile that he never retrieves.

If a rifle hunter and his or her guide watch an animal that has been shot at run away without flinching or

falling down, they may agree that the hunter missed and not even go and inspect where the animal was standing when shot, or follow the escape route searching for blood. It is my belief that gun hunters *unknowingly* wound more game than bowhunters. So the gun hunter who doesn't realize that he or she has caused a superficial wound is rewarded by being allowed to continue to hunt, while the bowhunter who is aware of the superficial wound must stop hunting if that is the law or rule of the guide.

Several years ago in Alaska, one of our regulations was interpreted as meaning that if you even disturbed an animal while hunting you must consider it taken and count it as part of your bag limit. This would have meant that if you shot at eight ducks sitting on a pond, killed one and the other seven were disturbed and flew away that you had "taken" all of them and were in fact over your bag limit. This clearly ridiculous interpretation has been changed. But the Alaska Professional Hunters Association is currently lobbying to have it made the law that any animal wounded must be counted as "taken," regardless of how lightly it has been wounded.

This raises many concerns. Will guides encourage hunters to take marginal shots? Will hunters refuse to take reasonable shots and wait for only absolutely certain shots? Does this put the guide and the hunter in a conflicted situation? If an animal is hit, will the guide give up too easily and say the hunt is over? Can a guide call off a hunt say, of a brown bear on the second day of a (\$12,000 for 10 days in the field) hunt because a bear was slightly wounded, or does the hunter have the right to demand to stay and continue to hunt for the specific bear that he wounded? Under the Alaskan Guide Regulations, a guide must use every means at his disposal to attempt to recover a wounded animal. Does this mean that he must pull other assistant guides and their clients in to help you hunt for your wounded animal? What if a hunter wounds an animal in this season, counts it against his bag limit

and then the following season kills the same animal? Does it not count against his bag limit in the second season because he already tagged and paid for it in the first season?

There may be no absolute answers to some of these questions. Reasonable guides and reasonable hunters should be able to agree on the proper ethical decision to make in the vast majority of circumstances. When hunting alone you are honor bound to make the appropriate ethical and legal decision. I believe that some room must be left in the law for hunters to make some of their own decisions. When laws try to force ethics, no real good is served. Ethical, law-abiding hunters may be forced to quit hunting because they have drawn a few drops of blood from an animal. Meanwhile, unethical hunters may continue to wound animals and not bother to follow-up. They may just continue to hunt because, in reality, the chance of enforcing these types of regulations is very difficult.

Finally, it is important to say that I am in no way advocating or endorsing wounding animals. But, some animals will inevitably be wounded and lost. If they are mortally wounded they should legally and ethically be counted against your bag limit. If they are superficially nicked they should not be counted against your bag limit. Yes, there will always be a gray area. But in reality, that gray area is very narrow and it should be left up to the conscience of the hunter and his guide to determine the right actions. You should discuss these things with your guide before the fact and hope that the above scenarios never happen to you.

#### **Editor's Note:**

*Without a doubt, Dr. Jack Frost is one of the most experienced bowhunters living today. With a variety of bowhunting accomplishments under his belt, including taking the first Grand Slam on North American Wild Sheep and the North American Super Slam, he is well respected and renowned. We are pleased to have him report on this important and controversial topic. <<*



**Alaska Falconers Association  
P.O. Box 55390  
North Pole, AK 99705-0390**

26 February 2014

Ted Spraker, Chair  
Alaska Board of Game  
% Boards Support Section  
Alaska Department of Fish and Game  
P.O. Box 115526  
1255 West 8<sup>th</sup> Street  
Juneau, AK 99811-5526

Dear Chairman Spraker:

At its January 2012 meeting, the Alaska Board of Game (Board) briefly considered Proposal No. 40, advocating non-resident take of Alaska raptors for falconry. Citing a lack of information and in the absence of meaningful public input, the Board deferred action on the proposal until its March 2012 meeting. The Alaska Department of Fish and Game (Department) suggested the Board would benefit from a “white paper” summarizing issues and questions regarding such a take, and perhaps including a potential scheme or schemes for implementing it. In response, the Alaska Falconers Association (AFA) provided the Board with our version of such a document, a copy of which is attached.

At its March, 2012 meeting, the Board further deferred the matter to its next statewide meeting, in March 2014. The Board instructed the Department to work with the AFA to craft a non-resident take scheme both could accept, and to present their suggestions at the March 2014 meeting. We have had ongoing conversations about this task, look forward to seeing the Department’s plan, and stand ready to provide the Department whatever assistance we can offer. Meanwhile, we are pleased to offer here preliminary descriptions of what the AFA feels are important features of a non-resident take program.

First, allow us to establish a few things for the record. The Department recently reported there were 44 Alaska-licensed falconers. The AFA counts virtually all of them, plus a few scientists, rehabilitators, and raptor enthusiasts as members. We have served as the voice of Alaska falconry for more than 35 years.

Falconry take of raptors from the wild is not and is not likely to ever become detrimental to wild raptor populations. The inherent difficulty of the sport means there will never be more than a handful of practicing falconers. Their take of wild raptors is



insignificant to the point of being undetectable. Nor would a reasonably limited non-resident take be a biological problem. If falconry were regulated in accordance with its effects on wild raptors and wild quarry, there would be few rules indeed. In fact, the Department's latest Alaska Falconry Manual, edition number 9, is 46 pages in length. We know of no other sporting activity in Alaska so strictly regulated as to impose more than a page of state guidelines for each individual practitioner.

In effect, non-resident take of Alaska raptors already exists, because "passage" birds (in immature plumage on their first southward migrations) are available for take across the Lower 48. Thousands of raptors hatched and fledged in Alaska migrate south, where falconers may legally take them.

The regulations we enjoy today have evolved over the past nearly 40 years. We don't want to jeopardize them or damage the favorable situation we enjoy in Alaska. Since Alaska falconers will be the ones living with the results – the aftermath, if you will – of a new non-resident take scheme, we suggest beginning conservatively, assessing how the program is working after a few years, and then considering renewing and/or changing it.

The former Proposal 40 was forwarded to the present Board schedule in the form of Proposal 174. We urge you to reject Proposal 174 and, if you are inclined to create a non-resident raptor take program, adopt a scheme along the lines the Department and the AFA suggest.

Borrowing heavily from our 2012 "white paper," these are the features we feel are important elements of a workable non-resident raptor take system. We'll simply list them at first, and then describe each in greater detail below.

1. This privilege is restricted to U.S. citizens.
2. Non-resident take is limited to seven or fewer birds total annually.
3. A non-resident applicant winning a permit may take one bird of any species allowed to a resident falconer of a similar class of falconry permit.
4. Non-resident take permits will be awarded per year by lottery, through the department's existing permit drawing system.
5. To enter a raptor take permit drawing, applicants must apply to the Department prior to December 31 of the previous year and pay a non-refundable entry fee of \$5.00 per application.
6. The department should take steps to prevent individual applicants, or an applicant's proxies, from unfairly dominating the selection process.
7. A successful applicant must purchase a non-resident hunting license or a non-resident combination hunting and fishing license, or purchase a non-resident raptor capture permit with a fee to be determined by the Board and the Department (we accept the proposer's suggestion of \$200.00), and present proof of being legally permitted to practice falconry in his or her home state.
8. Non-residents may take only passage raptors.



9. Non-resident take is allowed 1 September to 31 December annually.
10. Each successful applicant must notify the appropriate regional falconry representative prior to undertaking trapping activities, and must report in person to the department area biologist for the area where the permittees intend to conduct trapping activities. At that time, each permittee must present his or her non-resident hunting license or combination hunting and fishing license, or non-resident raptor capture permit, falconry permit or license from his or her home state, written permission from landowner(s), if pertinent, and provide any other information the department may require.
11. Before leaving Alaska, each permittee must report in person to the regional falconry representative whether successful in trapping a bird or not. If successful, a permittee must present his or her hunting license, capture permit, any bird taken, and provide whatever additional information the department may require.
12. Peregrine falcons, gyrfalcons and goshawks must be banded immediately upon capture with a locking, non-reusable, black nylon numbered U.S. Fish and Wildlife Service marker band. All other species of raptors must be banded immediately upon capture with a locking, non-reusable, red nylon numbered Alaska Department of Fish and Game marker band. Bands will be issued in person by the Department upon check-in prior to attempting to capture a raptor. The red Department marker band must remain affixed to the raptor until the bird arrives in the permittee's home state.
13. For at least five years after take, a non-resident successfully trapping a bird must file an annual report designed to track the movement, transfer, and disposition of the bird.
14. No one may offer or accept anything of value in exchange for raptor guiding services or other activities intended to assist a non-resident in taking a raptor for falconry.
15. A successful applicant may not apply for another non-resident take permit for at least five years, whether or not he or she was successful in trapping a raptor.
16. No new quotas or fees shall be imposed on resident falconers.
17. Lift restrictions on minimum possession time for residents to be able to move from the state with their falconry birds.
18. Lower, to the most liberal level allowed by federal regulations, the minimum time residents are required to fly birds in falconry before they may be transferred to captive breeding projects.
19. The Department and the Board shall review the entire non-resident raptor take scheme by 31 December 2017. The scheme will sunset 30 June 2018, unless affirmatively continued by the Board.

**1. This privilege is restricted to U.S. citizens.** The U.S. Constitution requires residents of all states have some level of opportunity to enjoy hunting and fishing privileges extended to Alaska residents, including take of falconry raptors. This



constitutional requirement applies to nonresident United States citizens only, not to nonresident aliens.

No reliable prediction of domestic non-resident interest in raptor take exists. Other states' experience suggests applicants would likely number no more than one hundred. However, non-resident alien applications could number many more. Interest in large falcons, especially from Middle East falconers, is strong, long-standing, and likely to continue. A considerable number of practitioners in the Middle East possess the financial and logistical ability to take advantage of a non-resident take in Alaska. It is not presently possible to reliably gauge the level of non-U.S. interest in Alaska raptors, but it is potentially substantial.

### **2. Non-resident take is limited to seven or fewer birds total annually.**

Generally, in big game drawing permit hunts, non-residents are allowed some fraction – typically, no more than 20% -- of resident take. It would be reasonable and consistent to impose a similar restriction on non-resident raptor take. However, Alaska sets no numerical quotas on resident raptor take. The state formerly imposed quotas on take of peregrine falcons for falconry, but eliminated them some years ago. The regulations the Board adopted in January 2012 recognize the self-limiting nature of falconry take of raptors and maintained the status quo, i.e., imposing no numerical quotas on resident wild take of falconry raptors.

Since Alaska does not impose numerical quotas on resident raptor take, we logically turn to actual take numbers from years past to establish typical resident take levels. Since 1990, resident take averaged less than ten birds a year. But because the Department's annual new acquisition totals combine wild-taken and captive-bred falconry birds, actual resident wild take is something less than ten birds a year.

Proposal 174 requests a total non-resident take more than twice the average annual resident take. While there are no biological concerns for non-resident take equaling or even exceeding (within reason) resident raptor take, we are aware of no other Alaska hunting seasons where non-residents are allowed to take more animals than residents, and are reluctant to set a new precedent that could affect other seasons and bag limits.

A level of non-resident raptor take consistent with typical Alaska hunts (i.e., no more than 20% of resident take), would amount to one or two birds a year. That seems miserly, but the state of North Dakota recently initiated a non-resident raptor take based on typical resident take, and limited total non-resident take to a single bird every other year.

**3. A non-resident applicant winning a permit may take one bird of any species allowed to a resident falconer of a similar class of falconry permit.** Rather than limit the number of birds by species available to non-residents and inventing a quota system based on something other than purely arbitrary considerations, we suggest the



simpler and more justifiable system of limiting the number of permits awarded and allowing each permittee access to the same array of species available to resident falconers. Even if all the successful applicants took birds of the same species, that level of take would not constitute even a remote threat to any wild raptor population.

**4. Non-resident take permits will be awarded per year by lottery, through the department's existing permit drawing system.** Awarding non-resident raptor take permits to interested applicants would require a fair and transparent system of collecting and tracking an as yet indeterminate number of applications. Whether using an existing system or inventing a new one, the Department will assume new work and incur additional expense to administer a non-resident raptor take.

A new lottery system could be created, but we believe it makes more sense to use the Department's existing drawing hunt system as a platform for awarding non-resident raptor capture permits. The department should be able to provide estimates of their costs of public notice, application collection, winner selection, permittee notification, take management, and other administrative expenses in conducting a drawing for non-resident raptor take permits.

**5. To enter a raptor take permit drawing, applicants must apply to the Department prior to December 31 of the previous year and pay a non-refundable entry fee of \$5.00 per application.** If the Department's existing system is used for awarding non-resident raptor capture permits, it makes sense to follow this standard application protocol, presently in place for other permit drawings.

**6. The department should take steps to prevent individual applicants, or an applicant's proxies, from unfairly dominating the selection process.** Other jurisdictions report attempts to subvert their selection systems, notably by multiple proxies entering applications on behalf of a single applicant. Several states relegate successful applicants to the end of the line in subsequent years, whether they take birds under their permits or not, to help distribute a limited number of permits more equitably among applicants.

Previously, in some Alaska draw hunts, applicants were found to have submitted multiple applications under names other than their own. The Board now requires all applicants to purchase a hunting license prior to applying for the permit. The Board needed go no further, as this restriction solved most of the problems. This remedy might not work if certain nonresidents were willing to risk a substantial sum of money to draw a permit to take a raptor in Alaska.

To further limit participation to legitimate and serious applicants, the department makes permits for some Alaska hunts available only in person, frequently in remote locations. Instead of drawing for permits online, they are awarded to applicants on a first-come, first-served, in-person basis.

**7. A successful applicant must purchase a non-resident hunting license or a non-resident combination hunting and fishing license, or purchase a non-resident**



**raptor capture permit, fee to be determined by the Department (we accept the proposer's suggestion of \$200.00), and present proof of being legally permitted to practice falconry in his or her home state.** Non-residents should expect to cover administrative costs to award permits, but how they compensate the state of Alaska for the privilege of taking raptors presents several challenges.

Non-resident permits for many big game hunts in Alaska are limited in number and typically cost hundreds of dollars. Non-resident raptor capture permits in Alaska would likely be few in number; they could easily be among the rarest of non-resident drawing permit opportunities. Issuing such permits for anything less than a substantial fee would be inconsistent with existing drawing permit protocol and could invite challenges to other permit fees (i.e., if the rarest of permits were inexpensive or even free, how could the state justify charging hefty fees for more commonly available permits?).

In light of the fees charged for other uncommon permits issued by the Alaska Department of Fish and Game, imposing a substantial fee for the falconry equivalent of a rare big game trophy is consistent with existing state policy. For example, a non-resident wishing to hunt musk oxen in Alaska pays a \$10.00 application fee to register for a permit hunt drawing, \$85.00 for a non-resident annual hunting license, and a \$1,100 fee for the requisite locking metal tag. The state issues four musk oxen tags to non-residents in a typical year. Fees for other species are substantial: e.g., a nonresident brown/grizzly bear tag costs \$500.00; Dall sheep \$425.00; and a moose tag \$400.00.

Any new fee structure imposed on non-residents for take of raptors for falconry would require action by the Alaska State Legislature. We do not mean to be disingenuous by advocating a permit system unlikely to survive the legislative process, yet we agree a reasonable fee is, well, reasonable. In place of a separate \$200.00 permit fee, we believe requiring non-residents to buy a regular non-resident annual hunting license (\$85.00) or, preferably, a non-resident annual combination hunting and fishing license (\$230.00) accomplishes the goal of compensating the state, at least in part, for implementing this new program, yet avoids the specter of sending a permit fee proposal to the near-certain doom of the legislative process.

As we understand it, a state may charge non-residents more than it charges residents for the same activity. However, if it charges residents nothing, it may not charge non-residents something. Thus, imposing a permit fee on non-residents means residents would also pay a new fee, and we residents are powerfully inspired to find an alternative method for non-residents to compensate the state. Since the most recent state regulations require residents to purchase hunting licenses in order to practice falconry, requiring non-residents to purchase hunting or combination hunting and fishing licenses is consistent and reasonable.

**8. Non-residents may take only passage raptors.** Falconers take raptors in two ways: 1) removal of nestlings, or "eyas," birds from nests or eyries before they are capable of flight, and 2) trapping of fully-flighted birds capable of hunting on their own and on their first migrations (i.e., "passage" birds). Each has advantages and drawbacks. Eyasses tend to be tamer and easier to train, but may turn out to be one of the eight or



nine of ten that were not destined for survival in the wild, and may not be effective hunters. Passage birds are strong fliers and experienced, already proven hunters, but tend to be wilder and thus more easily lost.

Many species of raptors build new nests or occupy new sites every year, but large falcons tend to reoccupy select sites repeatedly. Cliffside scrapes with features favorable to large falcons are unusual and tend to be used and re-used over many years. One site in Greenland was determined through radiocarbon dating to have been occupied as far back as 26,000 years ago. Consequently, eyrie sites used by large falcons are far more sensitive and precious than good hunting spots or hot fishing holes.

Falconers have long held known eyrie locations closely. Eyrie locations close to Alaska's limited road system are guarded even more carefully. If non-residents are allowed to take eyasses, falconers traveling to Alaska will be eager to take advantage of accessible eyries. The most accessible eyries near the road system are likely to become known throughout networks of Outside falconers. Once identified, a reliable source of eyasses is likely to be shared.

If eyries become known by too many people, unwanted attention and competition may result – and not just from other falconers. Wildlife photographers, birdwatchers, wilderness travelers, and others have all been known to visit large falcon eyries in Alaska with detrimental results. Additionally, in the past, individuals and government agencies have removed eyas raptors from eyries in Alaska outside the confines of existing falconry regulations. When eyries become widely known, they will be lost to residents forever. We prefer to avoid those possibilities entirely and limit raptor take to passage birds, at least to begin with.

Other states limit non-resident take to passage birds. Some place certain species entirely off limits to non-residents.

**9. Non-resident take is allowed 1 September to 31 December annually.** Since eyasses will be out of their nests by 1 September, this restriction guarantees birds taken during this time period will be passage birds.

**10. Each successful applicant must notify the appropriate regional falconry representative prior to undertaking trapping activities, and must report in person to the department area biologist for the area where the permittees intend to conduct trapping activities. At that time, each permittee must present his or her non-resident hunting license or non-resident raptor capture permit, falconry permit or license from his or her home state, written permission from landowner(s), if pertinent, and provide any other information the department may require.** These notification and reporting requirements are similar to those for resident falconers.

**11. Before leaving Alaska, each permittee must report in person to the regional falconry representative whether successful in trapping a bird or not. If successful, a permittee must present his or her hunting license, capture permit, any**



**bird taken, and provide whatever additional information the department may require.** The Department needs to conduct “exit interviews” with non-resident permittees in order to assess the new program. These requirements may be relaxed in future years, but in the early stages of the program, it is reasonable to facilitate information gathering by the Department.

**12. Peregrine falcons, gyrfalcons and goshawks must be banded immediately upon capture with a locking, non-reusable, black nylon numbered U.S. Fish and Wildlife Service marker band. All other species of raptors must be banded immediately upon capture with a locking, non-reusable, red nylon numbered Alaska Department of Fish and Game marker band. Bands will be issued in person by the Department upon check-in prior to attempting to capture a raptor. The red Department marker band must remain affixed to the raptor until the bird arrives in the permittee’s home state.** These requirements are similar to those in place for resident falconers and are consistent with state and federal regulations.

**13. For at least five years after take, a non-resident successfully trapping a bird must file an annual report designed to track the movement, transfer, and disposition of the bird.** The department must determine the ultimate disposition of falconry birds permanently removed from the state in order to appropriately adjust the program in future years. In a previous gyrfalcon export program, the Yukon Game Branch collected similar information to help biologists and managers determine the best level of take and permit allocation scheme.

**14. No one may offer or accept anything of value in exchange for raptor guiding services or other activities intended to assist a non-resident in taking a raptor for falconry.** We are not in favor of creating a ‘falconry guiding’ situation. Attaching a monetary value, even obliquely, to the removal of an animal from the wild, invites wide-ranging challenges and problems and creates incentives for greater wild take than might otherwise exist.

Existing statute makes no provision for falconry guides; expertise to populate a falconry program does not exist within the present Big Game Commercial Services Board structure.

Many aspects of taking a raptor in Alaska are difficult for residents to understand and navigate successfully; non-residents could not reasonably be expected to negotiate the intricacies of the Alaska situation without running afoul of state, local, Native, and other restrictions. Professional guides assist many non-resident big game hunters and are even required for some hunts. Some suggest professional raptor guides would be useful or even necessary for non-residents taking raptors in Alaska. Others advocate requiring Alaska licensed falconers to accompany non-residents taking birds in Alaska. We recognize these hurdles for non-residents, but oppose any form of commercial guiding.



**15. A successful applicant may not apply for another non-resident take permit for at least five years, whether or not he or she was successful in trapping a raptor.** Fair distribution of permits among applicants will be more easily assured if successful applicants are excluded from the system for a period of time to allow previously unsuccessful applicants to compete. If non-resident interest is insufficient to fill all available permits, previously successful applicants could be allowed in, but they would have had to apply in a separate category by the 31 December deadline.

**16. No new quotas or fees shall be imposed on resident falconers.** Presently, Alaska resident falconers pay no fees and are not limited by numerical quotas on raptors that may be taken from the wild. We like it that way and want it to stay that way. If the Board imposes quotas or fees on non-residents, we encourage it to do so in a way that will not necessitate the same for residents, even if the corresponding quotas were higher and the fees lower.

**17. Lift restrictions on minimum possession time for residents to be able to move from the state with their falconry birds.** Alaska's present falconry regulations include detailed restrictions on when and how resident falconers may temporarily and/or permanently export raptors from the state. Maintaining those restrictions while allowing immediate permanent export of raptors by non-residents creates an incongruous or even legally indefensible discrepancy between residents and non-residents. We recommend appropriate relaxation of those restrictions on resident falconers.

**18. Lower, to the most liberal level allowed by federal regulations, the minimum time residents are required to fly birds in falconry before they may be transferred to captive breeding projects.** Similar to #17 above, it is inconsistent to allow non-residents to take birds from the state and place them in breeding projects virtually immediately, yet restrict residents from doing the same. Federal stipulations are designed to prevent birds nominally taken for falconry from being transferred immediately to breeding projects; we recommend adopting state regulations for residents as liberal as possible in this regard, within the confines of federal rules.

**19. The Department and the Board shall review the entire non-resident raptor take scheme by 31 December 2017. The scheme will sunset 30 June 2018, unless affirmatively continued by the Board.** We believe any new program warrants review and careful consideration before allowing it to continue. We feel it is only prudent to maintain the opportunity to change or eliminate the program after assessing how it is working.

Finally, we note the total lack of resident falconry permit fees since Alaska adopted new federal falconry regulations. If and when the Department prepares a comprehensive package of license and other fee adjustments for legislative consideration, we recommend resident falconry permits be included. We'd like to contribute toward the cost of administering the regulations that make falconry possible in Alaska.



Thank you for the opportunity to comment and for considering our views.

Sincerely,

A handwritten signature in black ink, appearing to read "William R. Tilton", followed by the word "FOR" in a smaller, bold, handwritten font.

William R. Tilton, President  
Alaska Falconers Association



## **NON-RESIDENT TAKE OF ALASKA RAPTORS FOR FALCONRY**

Alaska Falconers Association  
P.O. Box 55390  
North Pole, AK 99705-0390

February 2012

- 1. Biological Considerations**
- 2. Legal Considerations**
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  - a. Protection of Raptor Eyries**
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- 5. Recommended Features Of An Alaska Non-Resident Raptor Take**

### **1. Biological Considerations**

The annual take of raptors by resident falconers has averaged fewer than nine birds over the past ten years; resident take has never exceeded twenty birds in any one year since falconry was authorized in Alaska. To date, no party with an interest in the welfare of raptor populations has asserted resident falconry take is unsustainable, or even detectable, at the population level.

Demand by non-residents could easily eclipse take levels by residents. A proposal recently submitted to the Board requested a total non-resident take approximately three times the average annual resident take. Biologically, allowing a non-resident take similar to or even larger than the resident take is unlikely to even register in an overall statewide assessment of raptor mortality, if such could be undertaken. This is pure conjecture, of course, but given known annual mortality from other sources, falconry is not and is not likely to become a significant or even detectable factor in annual raptor mortality.

Substantially increasing the annual take of raptors may invite scrutiny of both resident and non-resident raptor take. Individuals or groups may demand collection of population data to justify take by falconers. Some might push for a moratorium on take



until positive justification could be established. This is not unprecedented; federal guidelines for take of golden eagles is capped at six birds nationwide unless and until sufficient data exist to affirmatively demonstrate increased take would not adversely affect eagle populations. Disproving a negative assumption such as that would be time- and energy-intensive, expensive, and unlikely to be undertaken. It is highly unlikely sufficient data will ever exist to establish that level of assurance. If such a condition were imposed, falconry take could very well cease.

With the exception of certain subpopulations of the formerly endangered American peregrine falcon and, to a lesser extent, coastal goshawks, birds of prey in Alaska have never been the subjects of long-term, ongoing field research or population estimation. Now that peregrines have been completely delisted, field research on raptors is limited to sporadic and scattered studies. It is exceedingly unlikely any persons, groups, institutions, or agencies will ever collect and analyze data sufficient to accurately assess and track statewide raptor populations in Alaska.

## CONCLUSIONS

1. Wildlife professionals will never be able to base management decisions on comprehensive, up-to-date field data.
2. Resident take of Alaska raptors for falconry exerts no detectable impact on wild raptor populations.
3. A limited, conservative non-resident take of Alaska raptors is biologically defensible.
4. A disproportionately large proposed non-resident take may inspire calls for field data that are difficult or even impossible to produce.

## 2. Legal Considerations

Alaska Assistant Attorney General Kevin Saxby has advised the U.S. Constitution requires that residents of all states have access to hunting and fishing privileges extended to Alaska residents, including take of falconry raptors. This constitutional requirement applies to nonresident United States citizens only and does not apply to nonresident aliens. States may reasonably restrict such non-resident activity, but may not entirely exclude non-residents from activities allowed for residents.

## CONCLUSIONS

1. Alaska must work to provide non-resident U.S. citizens with some level of access to raptors.
2. No such requirement applies to non-resident aliens.
3. Non-resident raptor take may be restricted as the state sees fit.



### **3. Administrative Considerations**

#### **a. Logistics**

Awarding non-resident raptor take permits to interested applicants would require a fair and transparent system of collecting and tracking an as yet indeterminate number of applications. Whether using an existing system or inventing a new one, the department will assume new work and incur additional expense to administer a non-resident take.

No reliable prediction of domestic non-resident interest exists, but other states' experience suggests applicants would likely number no more than one hundred. Non-resident alien applications could number many more. Interest in large falcons, especially from Middle East falconers, is strong, long-standing, and likely to continue. A considerable number of practitioners in the Middle East possess the financial and logistical ability to take advantage of a non-resident take in Alaska. It is not presently possible to reliably gauge the level of non-U.S. interest in Alaska raptors, but it is potentially substantial.

A new lottery system could be created, or the existing Alaska Department of Fish and Game (department) drawing hunt system could serve as a platform for awarding non-resident raptor permits. The department should be able to provide estimates of their costs of public notice, application collection, winner selection, permittee notification, take management, and other administrative expenses in conducting a drawing for non-resident raptor take permits.

Other jurisdictions report attempts to subvert their selection systems, notably by multiple proxies entering applications on behalf of a single applicant. Several states relegate successful applicants to the end of the line in subsequent years, whether they take birds under their permits or not, to help distribute a limited number of permits more equitably among applicants.

Biological concerns sufficient to warrant emergency closures or other actions are unlikely to arise, but administrative problems may trigger a need for regulatory amendment. The Board's and the commissioner's existing authorities likely provide the legal latitude to make needed adjustments, but until it becomes well-established, a non-resident take system may demand to be revisited and examined more frequently than falconry regulations are reviewed, i.e., every four years.

### **CONCLUSIONS**

1. Any new non-resident take system should be as close to cost neutral to the department as possible.
2. The department should prevent individual applicants from dominating the selection process.
3. Alaska should anticipate considerable non-resident alien interest in raptors.



4. The U.S. Constitution does not require Alaska to provide opportunities for raptor take by nonresident aliens.
5. Alaska should retain the flexibility to curtail or alter any non-resident take scheme to respond to unanticipated problems or difficulties outside of the usual quadrennial schedule of falconry regulation review.

#### **b. Permit Fees**

Non-residents should expect to cover administrative costs to award permits. Additionally, non-resident permits for many big game hunts in Alaska are limited in number and typically cost hundreds of dollars. Permits for non-resident take of raptors for falconry in Alaska would likely be few in number; they could easily be among the rarest of non-resident drawing permit opportunities. Issuing such permits for anything less than a substantial fee would be inconsistent with existing drawing permit protocol and could invite challenges to other permit fees (i.e., if the rarest of permits were inexpensive or even free, how could the state justify charging hefty fees for more commonly available permits?).

In light of the fees charged for other uncommon permits issued by the Alaska Department of Fish and Game, imposing a substantial fee for the falconry equivalent of a rare big game trophy would be entirely consistent with existing state policy. For example, a non-resident wishing to hunt musk oxen in Alaska pays a \$10.00 application fee to register for a permit hunt drawing, \$85.00 for a non-resident annual hunting license, and a \$1,100 fee for the requisite locking metal tag. The state issues four musk oxen tags to non-residents in a typical year. Fees for other species are substantial: e.g., a nonresident brown/grizzly bear tag costs \$500.00; Dall sheep \$425.00; and a moose tag \$400.00.

Previously, in some Alaska draw hunts, applicants were found to have submitted multiple applications under names other than their own. The Board now requires all applicants to purchase a hunting license prior to applying for the permit. The Board needed go no further, as this restriction solved most of the problems. This remedy might not work if certain nonresidents were willing to risk a substantial sum of money to draw a permit to take a raptor in Alaska.

To further limit participation to legitimate and serious applicants, the department makes permits for some Alaska hunts available only in person in sometimes remote locations. Instead of drawing for permits online, they are awarded to applicants on a first-come, first-served, in-person basis.

Any new fee structure imposed on non-residents for take of raptors for falconry would require action by the Alaska State Legislature.

#### **CONCLUSIONS**

1. Alaska charges substantial fees for drawing permits that are few in number.
2. The Board may require applicants to purchase a non-resident hunting license



- to enter a permit drawing.
3. Permits may legally be issued from local Department offices, and aspiring hunters may need to appear in person to claim them.
  4. A fee for non-resident raptor take permits would require new legislation.

### **c. Permit Allocation**

Other jurisdictions report setting quotas, often by species, to limit non-resident take. Some states forbid take of certain species by non-residents. Only rarely do these states possess even limited data on wild raptor populations or trends.

Alaska formerly imposed quotas on take of peregrine falcons for falconry, but eliminated them some years ago. The regulations the Board adopted last month recognize the self-limiting nature of falconry take of raptors and maintained the status quo, i.e., imposing no numerical quotas on resident wild take of falconry raptors.

Generally, non-residents are allowed some fraction – typically, no more than 20% -- of resident take. Lacking resident take quotas, Alaska must rely on annual take numbers from years past to establish typical resident take levels. While there are no biological concerns for non-resident take equaling or even exceeding (within reason) resident raptor take, we are aware of no other Alaska hunting seasons where non-residents are allowed to take more animals than residents.

## **CONCLUSIONS**

1. Any new scheme of take is justifiably set conservatively at first, with increases considered only after some years of experience with the new take regime.
2. Typically, non-resident take comprises some fraction of, and never exceeds, typical resident take.

## **4. Other Considerations**

### **a. Protection of Raptor Eyries**

Falconers take raptors in two ways: 1) removal of nestlings, or eyas, birds from nests or eyries before they are capable of flight, and 2) trapping of fully-flighted birds capable of hunting on their own and on their first migrations (i.e., passage birds). Each has advantages and drawbacks. Eyasses tend to be tamer and easier to train, but may turn out to be one of the eight or nine of ten that were not destined for survival in the wild, i.e., not effective hunters. Passage birds are strong fliers and experienced, already proven hunters, but tend to be wilder and thus more easily lost.

Many species of raptors build new nests or occupy new sites every year, but large falcons tend to reoccupy select sites repeatedly. Cliffside scrapes with features favorable



to large falcons are unusual and tend to be used and re-used over many years. One site in Greenland was determined through radiocarbon dating to have been occupied as far back as 26,000 years ago. Consequently, eyrie sites used by large falcons are far more sensitive and precious than good hunting spots or hot fishing holes.

Falconers have long held known eyrie locations closely. If eyries become known by too many people, unwanted attention and competition may result – and not just from other falconers. Wildlife photographers, birdwatchers, wilderness travelers, and others have all been known to visit large falcon eyries in Alaska with detrimental results. Additionally, in the past, individuals and government agencies have removed eyas raptors from eyries in Alaska outside the confines of existing falconry regulations.

Other states restrict non-resident take to passage birds and some place certain species off limits to non-residents.

## CONCLUSIONS

1. Alaska is justified in limiting knowledge of and access to eyries and nest sites, especially those of large falcon species.
2. One way to protect large falcon eyries is to restrict take to passage birds.

### **b. Protection of Resident Privileges**

Presently, resident falconers pay no fees beyond the cost of a hunting license, and are not limited by quotas on take by species. There are no administrative, financial, political, or biological reasons to alter this arrangement.

## CONCLUSIONS

1. Alaska need impose no fees or additional requirements on resident take of falconry raptors.
2. Alaska need impose no numerical quotas on resident take.

### **c. Impact on Existing Regulations**

The regulations adopted by the board last month include detailed restrictions on when and how a resident falconer may temporarily and/or permanently export a raptor from the state. Maintaining those restrictions while allowing permanent export of raptors by non-residents might create an incongruous or even legally indefensible discrepancy between residents and non-residents.

## CONCLUSION

1. The Board should work with its legal advisors to maintain consistency between restrictions on residents and non-residents.



#### **d. Guiding**

Many aspects of taking a raptor in Alaska are difficult for residents to understand and navigate successfully; non-residents could not reasonably be expected to negotiate the intricacies of the Alaska situation without running afoul of state, local, and Native restrictions. Professional guides assist many non-resident big game hunters and are even required for some hunts. Some suggest professional raptor guides would be useful or even necessary for non-residents taking raptors in Alaska. Others advocate requiring Alaska licensed falconers to accompany non-residents taking birds in Alaska.

Existing statute makes no provision for falconry guides; expertise to populate a falconry program does not exist within the present Big Game Commercial Services Board structure.

Attaching a monetary value, even obliquely, to the removal of an animal from the wild, invites wide-ranging challenges and problems and creates incentives for greater wild take than might otherwise exist.

#### **CONCLUSIONS**

1. Allowing the exchange of anything of value for raptor guiding services would open a large universe of challenges and problems.
2. The Board may preclude raptor guiding services by prohibiting financial or material remuneration for assisting a nonresident falconer take a raptor.

#### **e. Reciprocity**

Some states limit non-resident access to raptors in their states to residents of states that also allow non-resident take, i.e., "reciprocity." Such provisions are intended primarily to encourage all states to allow non-resident take.

Sponsors of a recent proposal requested the Board include a reciprocity clause in non-resident take regulations, i.e., they advocate restricting take in Alaska to residents of states that also allow non-resident take of falconry raptors in their states. This assertion invites examination on at least four fronts: 1) constitutionality; 2) practicality; 3) administrative logistics; and 4) benefit to Alaska falconers.

1) The same provision of the U.S. Constitution requiring states to provide non-residents access to activities allowed to their residents also renders such reciprocity clauses illegal.

2) Presently, only Connecticut and West Virginia lack non-resident take provisions (Hawaii allows neither falconry nor non-resident take). Rules preventing residents of those states from taking raptors in Alaska would affect only a very few



individuals and would accomplish little as far as exerting pressure on those states to implement non-resident take.

3) Keeping track of other states' reciprocity standing would require the Department to expend significant effort to monitor each state's regulatory status to insure up-to-date, legal, even-handed treatment of all applicants.

4) The assertion Alaska falconers would enjoy expanded access to raptors in other states is illogical. With the exception of passage tundra peregrine falcons, the Lower 48 states offer few opportunities attractive to Alaskans.

## CONCLUSION

1. A reciprocity clause in Alaska's regulations is neither legal nor desirable.

## **5. Recommended Features Of An Alaska Non-Resident Raptor Take**

- Restricted to U.S. citizens.
- Non-resident take limited to five birds total annually.
- Five non-resident take permits awarded per year by lottery, through the department's existing permit drawing system.
- A non-resident applicant winning a permit may take one bird of any species allowed to a resident falconer of a similar class of falconry permit.
- Charge an entry fee of \$5.00 per application to enter a raptor take permit drawing.
- The department should take steps to prevent individual applicants, or an applicant's proxies, from dominating the selection process.
- A successful applicant must purchase a non-resident hunting license, pay any non-resident raptor take fee determined by the department (we suggest at least \$100.00 per permit), and present proof of being legally permitted to practice falconry in his/her home state.
- A non-resident may take only a passage raptor.
- Non-resident take allowed 1 September to 31 December annually.
- A successful applicant must notify the appropriate regional falconry representative prior to undertaking trapping activities, and must report in person to the department area biologist for the area where the permittee intends to conduct trapping activities, and present his or her non-resident hunting license, falconry permit or license from his or her home state, written permission from landowners, if pertinent, and provide any other information the department may require.
- A permittee must report in person to the regional falconry representative before leaving the state, whether successful in trapping a bird or not. If successful, a permittee must present his or her hunting license, capture permit, and any bird taken, and provide whatever additional information the department may require.



- Any bird taken by a non-resident, regardless of species, must be banded with a locking, non-reusable, black nylon numbered marker band issued in person by the Department upon check-in prior to attempting to capture a raptor.
- For at least five years after take, a non-resident successfully trapping a bird must file an annual report designed to track the movement, transfer, and disposition of the bird.
- No one may offer or accept anything of value in exchange for raptor guiding services or other activities intended to assist a non-resident in taking a raptor for falconry.
- A successful applicant may not apply for another non-resident take permit for at least five years, whether or not he or she was successful in trapping a raptor.
- No new quotas or fees shall be imposed on resident falconers.
- Board review of the entire non-resident raptor take scheme is required by 31 December 2014; scheme sunsets 31 December 2016.



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

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

**February 27, 2014**

**Dear Mr. Chairman & Members of the Board:**

**On behalf of the nearly 1,000 members of the Alaska Trappers Association and our Board of Directors, I wish to share our opinion on two proposals which you will be considering during your 2014 Statewide Regulations meeting in Anchorage.**

**We support both proposals #143 and #144.**

**We support the repeal and elimination of the raw fur skin export permit. This is in agreement with both proposals submitted by the Fairbanks Fish and Game Advisory Committee and the Alaska Department of Fish and Game.**

**We appreciate the opportunity to participate in the regulatory process.**

**Sincerely,**

**Joe Letarte  
Board President**

A handwritten signature in black ink that reads "Joe Letarte".



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



February 28, 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 the Statewide Regulations meeting, March 14-18, 2014 in Anchorage.

**AWA's Mission Statement**

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

Thank you for considering our comments.

Yours truly,

A handwritten signature in black ink that reads "Connie Brandel". The signature is written in a cursive, flowing style.

Connie Brandel  
Office Manager



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

### **Statewide Cycle A Regulations Meeting**

**PROPOSAL 172:** Remove black bears from the furbearer classification.

We **SUPPORT** this proposal and urge the Board of Game to approve it.

The 2010 decision by the Alaska Board of Game to list black bears as a furbearer paved the way to allow bear snaring for the first time since statehood. Nowhere else in North America is it legal to trap or snare black bears under a general trapping license in areas where grizzly bears are known to be present. Black bears are big game animals and should be classified as such.

The National Trapper's Association does not consider bears to be furbearers. Our research on other states (the few that are still lucky enough to have bears present), show that bears are universally classified as a game animal. Typically, wildlife managers use the term "furbearer" to identify species that have traditionally been hunted or trapped *primarily* for their fur.

Even in Maine, where the trapping of bears by the public is allowed, the season is short, the limit is one bear per permit holder, traps must be checked daily, and bears are NOT classified as furbearers. Montana, Idaho, Wisconsin, Wyoming, North Dakota, Utah, Oregon, Minnesota all classify bears as game animals and do not allow the snaring of bears.

This unusual classification (of bears as a furbearer) appears to be an anomaly: the Alaska Board of Game's way of circumventing conventional, standard terminology. We understand why the Board made this decision; however we maintain that it is an erroneous decision made without any kind of scientific reasoning.

The reason the Board of Game amended the regulations to include black bears as furbearers has nothing whatsoever to do with citizens needing to put meat on the table for their families, but rather another backdoor attempt to kill more bears. In fact it is not a requirement to salvage the meat from bears caught and killed in snares. Not only is this promoting wanton waste of an animal, but it completely disregards the ethics of fair chase and respect for the animal. The Board of Game regards black bears with the same disdain as it would show sewer rats: they are perceived as vermin to be quickly eradicated.

Bear snaring is indiscriminate, wasteful, and cruel, and poses a danger to the public. With unlimited numbers of snares and long open seasons, snaring may kill more bears



than is sustainable. Snaring and killing of bears regardless of age, species, and gender is incompatible with the scientific principles and the ethics of modern wildlife management.

The classification of bears as furbearers is a wasteful and inappropriate use of the resource. It is squarely at odds with bear management policies maintained since statehood that recognize the special status of bears for Alaska residents and hundreds of thousands of visitors annually.



February 28, 2014

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

**RE: Proposal 177 – 5 AAC 92.080(4) & (5). Unlawful methods of taking game; exceptions, and 92.990 (70) Definitions.**

Dear Alaska Board of Game:

I am planning on providing public testimony in support of Proposal 177 at the March 2014 BOG meeting, but in case I do not make it down, or even if I do, I would like to provide my own written comments for the record. The Kotzebue Sound AC is providing separate comments.

The following address the issues concerning Proposal 177:

The first issue is one of conservation; will allowing for this method increase harvest rates? Since the majority of people have always hunted this way there should be no noticeable increase in harvest. It is also useful to point out that the majority of wolves and wolverines are taken by a very small percentage of the hunters with very little annual recruitment into this group. It takes a lot of skill, experience and fortitude to regularly and successfully hunt these animals, almost all other people that harvest these animals do so on an opportunistic basis, which by definition will not change if this proposal is adopted. Additionally, it should be pointed out that any time a hunter can get within shooting range of animals without chasing them that is the preferred method and will be taken at all opportunities, it is not as though people are chasing animals for entertainment, risking injury to themselves and their equipment and burning expensive gas and oil for the fun of it. The problem is much of the hunting grounds are flat exposed tundra, frozen ocean, lakes and rivers or barren mountainous areas, where in the winter animals can see people miles away and hear them coming from even further distances and almost never, if ever, stand around waiting until hunters are in range.

The second issue is related to ethics, not the sport hunting ethic - as hunting for most people in the region is not a sport, but a way of life and to make a living. The ethic relates to killing an animal in the quickest and most humane way possible, which in northwest Alaska is to shoot them in the back of the head where the head and neck meet - instantly killing them. In addition to being the most humane method of killing an animal, this method wastes the least amount of meat, contaminates the least amount of meat with lead and other metal residue from bullets and in the case of fur animals does not rip large holes in the pelt or bloody up the fur like body shots can do, decreasing its value substantially depending on the particular situation. Unlike typical shots seen on the outdoor channel for trophy hunters, nobody raised in the region shoots animals in the body on purpose. This is also the same reason shooting caribou in the head with small caliber rifles from motor boats, which by the way is legal, is a popular method. Of course when animals are running and you are forced to shoot from a long ways away it is very hard to shoot animals in the head, in addition the farther away you are the more destructive the shot will be to both fur and meat as it takes a lot more powder and bullet weight to acquire the type of accuracy necessary to shoot a long ways.



It should be noted that purchasing and shipping a snowmachine is very expensive, especially relative to the average annual incomes in the region, and 10 dollar a gallon gas and 60-80 dollar a gallon oil necessitates maximizing opportunity when out hunting, so it is not practical to expect people to pass up opportunities to take caribou or wolves and wolverines when they are found, which as stated above in most cases they are already moving away from the hunter by the time they are within range. Being able to take these animals during the course of a winter contributes significantly to food security, the economy, culture, and hunter identity. There is a multiplying effect in all of these areas; they do not just accrue to the hunter alone.

Since this method of hunting is a local custom, formal support of this method will improve the ability of wildlife managers and enforcers to successfully carry out management strategies that in large part rely on voluntary compliance, because of the large areas involved and the small number of officials to monitor the area and not threat of enforcement to achieve. The validity of this argument should be obvious given how common a hunting practice this has been and the low number of enforcement actions related to it, which as far as I know is 1 – the 1 that started this whole proposal in the first place. This should be especially noteworthy since active successful wolf and wolverine hunters take a disproportionate amount of all game, these are generally not occasional hunters but very active year round hunters, alienating this segment of the population in particular would be counterproductive going forward. Overall making this legal will improve relations between local people and wildlife enforcement increasing the likelihood of cooperation in investigations and more reports of illegal activity that is not locally accepted as ethical.

Lastly, moose, caribou, muskox and Dall sheep are all barley stable or decreasing in the unit, while wolf populations are increasing, necessitating the ability of local people to target predators to reduce their impact on prey populations, which directly go to supporting the local economies, culture and food security of the region. It should also be pointed out that the current rules in GMU 23 for wolf hunting with snowmachine would only allow for a single wolf to be taken and that would almost always have to be only by chance, you do not sneak up on wolves with snowmachines and you definitely in all but the rarest of case do not shoot more than one wolf at a time without chasing them. Packs of wolves do not stand around waiting to be shot, this is even more true in large parts of the region as described earlier as wide open spaces of tundra, ice and rock, maybe in the areas widely covered by trees there can be scenarios of chance where you could shoot a couple of wolves without chasing them, but it rarely if ever happens in the open country. Without allowing local people the ability to control wolf populations it is very likely that the State will have to institute intensive management approaches, which are costly and not particularly popular, it is far better to create opportunities for local people to deal with predators and support local economies without any cost to the State.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Alex Whiting".

Alex Whiting – P.O. Box 1001 – Kotzebue, Alaska 99752 – [alex.whiting@qira.org](mailto:alex.whiting@qira.org)  
Vice Chair & Secretary Kotzebue Sound Advisory Committee



## **Wolf and wolverine hunting in GMU 23 – regulation fix request**

Current regulations regarding the use of snowmachines for hunting wolves and wolverines are insufficient to accommodate local hunting practices that have been used since snowmachines first arrived in GMU 23. Even where the regulations allow for positioning a hunter to shoot from a stopped snowmachine (in GMU's that currently do not include GMU 23), the gray area of what constitutes harassing, herding or molesting game, remains in effect. While this modification allows for legal harvest of wolves (but not apparently wolverines) in rare cases where a hunter happens upon them with a snowmachine, in a manner where pursuit of fleeing animals has not occurred (which can and does in fact happen), this circumstance is the exception and not the rule. And it is common knowledge that rules based on exceptions are generally problematic. Basically, all wolves (but again not wolverines) caught using a snowmachine must be assumed to have been taken under such limited circumstances, in order for them to be considered legal.

For those that may not have real life experience using a snowmachine to hunt wolves or wolverines, it may be helpful to understand that in a majority of cases the animals are not first visually observed, but that fresh tracks are followed, and long before the animals come into view, the tracks will show that the animals have heard the snowmachine approaching and begun running (at which point it appears according to current prohibitions the hunter is supposed to stop pursuit – effectively ending the hunt). In most cases however the tracks will continue to be followed until the hunter sees the animals and then the snowmachine is used to catch up to the animals close enough to shoot them. While a single animal can be caught on occasion without pursuit (as stated above), it is extremely rare when more than one animal can be taken from a pack without the pursuit of fleeing animals having occurred. So current regulations that are intended to provide legal cover (the allowance for the positioning of the hunter) would in all but the very rarest of cases make multiple wolf kills essentially illegal. One other point related to close approach hunting is the ability of the hunter to use small caliber .22 mag and similar, to place the shot in the back of the head, thus instantly and humanely killing the animal, while at the same time not destroying pelt



integrity by creating large rips, holes, tears, and blood matting that is more typical when using large caliber rifles from long distances with a lot less precise shot placement.

Because the actual capture of animals is rarely witnessed by anyone but the hunter(s), enforcement of the prohibition of pursuing fleeing animals has been rare and so the practice of hunting this way has remained. In fact enforcement has been so rare as to allow many, if not most, wolf hunters in the region, to not even be aware that pursuing fleeing animals, is and has been in fact, illegal all along.

Of the justifications for the current prohibition on using snowmachines to pursue fleeing animals, one is couched in conservation terms – that is allowing this method will lead to rapid depletion of the species for which this method is used - I would argue that the current population of wolves and wolverines in GMU 23 is direct evidence against this concern, since the prohibited practice has been in effect for the last 40 plus years and yet both species continue to be present in huntable numbers, in fact wolves appear to be increasing, if anything. In addition, not everyone is regularly successful at harvesting these species by snowmachine, because even when using a snowmachine it takes a lot of skill, experience and even a certain amount of fortitude given the extreme temperatures, amount of daylight and mountainous areas where these species are regularly found, to be able to repeatedly find and track down these animals successfully. In fact, the majority of animals are taken by a relatively small segment of the population with a small annual recruitment of new “members” and changing the law will not change this dynamic in any appreciable manner.

The other reasons against allowing pursuit of fleeing animals, is based on ethical arguments that spring from western philosophical understandings of how humans should relate to animals and from the western sporting tradition of fair chase. In this case I would argue that the local culture of relating to animals, comes from a long tradition of emphasizing the use of animals to provide for the needs of the people, and is not based on sporting ethics, or other western philosophies. This approach can be easily demonstrated, for



example, by the common widespread (and notably legal) local traditions of using a motorized boat to approach swimming (and fleeing) caribou and belugas and shooting, or harpooning them. In the minds of local people they correctly make no distinction between these species (and all other species) in terms of the methods used to capture them. This in large part is the basis for the confusion over what are legal methods and why different approaches to different species occur in western law.

While there has been a significant increase in the access to western manufactured goods in GMU 23, there is as yet no suitable replacement for wolf and wolverine fur for the utilitarian purposes they serve and also there is a cultural significance attached to them that is unable to be replaced - both on how the products derived from these species are valued by the users and the role they play in the identity of the hunters. Also, the ability to take the occasional wolf or wolverine by this method creates opportunity for local hunters to supplement their income and pay for the high cost of fuel and associated traveling costs, which is no small effect given the high costs of living in the region and the relatively high amount paid locally for these valuable furs. Almost all of these furs are in fact sold in the region to be turned into valuable ruffs and other irreplaceable local commodities, which has a multiplying effect by providing income for the seamstress's and others using them for these purposes, in addition to the hunters.

Another argument in favor of accommodating local practices of pursuing fleeing wolves and wolverines can be made: that in order for people to respect the law - that the law needs to respect the people. Anytime the law conflicts with widespread and socially acceptable practices, it undermines the value people place on the whole body of laws and the ability to promote conservation and management in a cooperative manner. In other words the system demands integrity to be respected, which it currently lacks in this regard because it is in perpetual conflict with what actually takes place. In addition, as stated above the people most affected by increased enforcement of the current prohibition are the super harvester community, exactly the people that need to be recruited into management efforts that by necessity, given the



size of GMU 23 in relation the number of enforcers, has to be by and large a voluntary compliance approach.

Lastly, the recent event that precipitated this current conversation – that of a Kivalina hunter that had a wolverine confiscated for the reason of illegally chasing it down - if left standing unaddressed, will likely have a dampening effect on the number of people actively hunting wolves and wolverines. Which means in addition to the negative economic implications addressed above, more of these predators will be left in the country, resulting in increased predations on sheep, moose, caribou and muskox, all of which have had recent slow growth, or a decrease in standing stocks (even with predator hunting by snowmachine being commonplace and uninhibited by the threat of prosecution). If this occurs the result will put additional strains on these populations, most likely leading to an increase in the rate of population declines, adding to the economic hardship already being faced by local residents. There are real economic implications associated with this activity that should not be ignored.

For all these reasons there is a desire to legalize the longstanding practice of pursuing wolves and wolverines with snowmachines, so local people can do so without the threat of confiscation of caught animals and other penalties. This would promote cooperation on mutually agreeable conservation and management strategies that can then become locally accepted without the threat of enforcement as the basis for their implementation – which is a very poor approach to achieve these objectives.

It is the hope that the Board will address this issue at the earliest possible time in a mutually satisfactorily way, so the negative impacts mentioned above do not come to be. Thank you for your consideration of this topic and my thoughts on it.

A handwritten signature in cursive script, appearing to read "Alex Whiting".

Alex Whiting  
Vice Chair/Secretary Kotzebue Sound Advisory Committee



Submitted By  
Alvin S Ashby Sr  
Submitted On  
1/9/2014 9:58:01 AM  
Affiliation  
Alaska native

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with any regulations to the law of hunting,

let it be either changed or making new laws, they need to contact all united states citizens and and have a comment periods so it can work for the better of its people. Not just in the cities where there is city foks come to our village and let the people of Noatak and the nana region know of new changes are being made.Before money came to the natives we had hunting and gathering in the land of its people that lived in there area. When and where does it say that white men can come and takes without consoling with the natives of there land.Hunger has no juristriction for the natives we know what to get and when.,

any way i would like to ask if the board can send any information concerning the changes of law pertaining to hunting regulations, also a complete copy of the hunting regulations that already been made..maybe someone from the fish and game board came come to our village and explain all the laws of the hunting regulation. who made it and how it will be inforced....thank you for your help in any way possible have a good day..



Submitted By  
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Submitted On  
2/28/2014 12:55:13 PM  
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February 26, 2014

Alaska Board of Game  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
Online: [www.boardofgame.adfg.alaska.gov](http://www.boardofgame.adfg.alaska.gov)

Subject: **March 2014 RC Proposal 174-5 AAC 92.037 – Permits for Falconry - Allow Nonresidents to Take Raptors for Falconry.**

Dear Ladies and Gentlemen of the Board:

This RC is to comment on the raptor nonresident take proposal contained in Proposal 174-5 AAC 92.037 and to reaffirm that the proposal was drafted with the assistance of Alaska falconers in order to address many of the concerns addressed by same; represents an extremely conservative path to introducing nonresident raptor take into Alaska; and provides a balanced, sensible approach that if adopted, should be able to withstand any constitutional challenges. Conversely, it appears that many of the Proposal 174-5 AAC 92.037 proposed additional restrictions on nonresidents are constitutionally unsupportable unless such restrictions are also placed on residents.

Since some of the conclusions in Proposal 174-5 AAC 92.037 are not supported by scientifically or rationally based arguments, we respectfully suggest the Board consider the information in this RC. We are confident the Board can adopt a better, more defensible product once they have had time to comprehensively weigh the outstanding nonresident take issues, including the conflicts that would exist between the several nonresident proposals and the recently adopted Alaska falconry regulations and any necessary legislative action that may be required.

AFC believes that while non-resident take may be restricted as the state sees fit, such restrictions must reasonably restrict such non-resident activity. In the case where there is no measurable effect on a resource by residents and no restrictions are placed on such residents, but it can be demonstrated that the addition of nonresident harvest pressure will likely have a detrimental effect on the resource, it is reasonable to place restrictions on nonresidents only to the extent necessary to protect the resource. If however, there is no measurable effect on the resource from the combined harvest of both residents and nonresidents, it is unreasonable to place restrictions on nonresidents unless those same restrictions also are placed on residents.

AFC supports the adoption of a requirement that a non-resident applicant for a raptor harvest permit must hold an appropriate class falconry license issued from a state with a falconry program approved under 50 CFR 21.29. If, however, alien means nonresident U.S. citizens, AFC disagrees. The state records across the U.S. of raptor harvest by nonresidents, examples of which have been provided to the Board, support that nonresidents exert no measurable effect on any resident raptor populations, including populations where no quotas are placed on either residents or nonresidents. The raptor resource management strategy contained in the USFWS Environmental Assessment (EA) that accompanied the recent modifications of the federal falconry regulations was designed to ensure that an extremely conservative harvest level below 5% of the wild raptor populations would not occur through an annual 2-bird from the wild quota placed on each and all U.S. falconers. Regulations governing falconry and adopted by the Board in recent years recognize the self-limiting nature of falconry take of raptors. The USF&WS EA on falconry actually argues that a 20% harvest of immature raptors from healthy populations is sustainable. At this time, AFC urges the Board to adopt harvest regulations that would allow for an extremely conservative harvest level of up to 5% of the annual estimated production of immature raptors of each species of interest to falconers.

Comments have been made relating to potentially high demand by non-residents for raptor harvest permits which might result in non-residents capturing more raptors than residents in a given year. It does not matter who captures the raptors so long as the total harvest is



at a no negative impact level. Furthermore, Alaska resident harvest within Alaska is far below the 2-birds per falcon impact quota. If Alaska residents harvested at the no impact levels, that would constitute 80 birds per year, a level that is still not measurable when one considers the extremely large magnitude of the Alaska raptor resource. Resident and non-resident falconers should be allowed to harvest immature raptors so long as the combined harvest remains at no-impact levels as determined by the department

AFC recognizes that it may be necessary for the department to close certain areas and /or eyries for falconry harvest, either by non-residents or for any falconry take. Excessive pressure on easily accessible eyries can be controlled by limiting the number of permits issued for a given management area. This amounts to exactly the same management strategy used to control the harvest of any big game species. There is no basis in fact or reason to conclude that the act of harvesting nestling falcons has any impact on individual falcon pairs or populations. Alaska has a huge abundance of suitable nesting sites for large falcons; which are the very reason large falcons are common in Alaska.

During the process of formulating Proposal 40, AFC worked with several Alaska falconers and incorporated their desire to protect certain locations and eyries customarily utilized by Alaska resident falconers. This was the genesis of the inclusion of restrictions on nonresidents in certain GMUs. Even though AFC is aware of no other nonresident resource harvest scheme that locks nonresidents out of specific areas but does not apply the same restriction to residents, if there are a few other GMUs or sub-units that should be included in the Proposal 40 list, then AFC supports their inclusion.

AFC would like to point out the following items to which we have some objections or reservations. These restrictions are either not supported by any biological data or are unnecessary for accomplishing the stated goals:

- a)** As explained in Numbers 1, 2 and 3 above, there is no biological or rational justification for the listed restriction of limiting nonresidents to 5 birds total annually. The proposal limits amended to include the Kodiak AC suggested revision at the January 2012 meetings are extremely conservative and will result in no measurable impact.
- b)** As explained above, there is even less justification for any proposed restriction on taking only passage raptors during a Sept. 1 to Dec. 31 timeslot. Restrictions on harvesting nestling raptors in particular GMUs or sub-units could allay some of the concerns over competition expressed in the record.
- c)** There has been absolutely no justification presented for adopting a provision that "*A successful applicant may not apply for another non-resident take permit for at least five years, whether or not he or she was successful in trapping a raptor.*" No U.S. state has such a limitation. If the intent of the provision is to manage fairness among nonresidents, there are other less drastic means for accomplishing such a goal, some of which are contained in PC 201. A reasonable alternative would be an annual lottery that ranks each entrant and then gives preference in accordance with rank in the second year, to first year entrants who did not receive permits during the first year. Second year entrants would be ranked and added to the bottom of the first-year list, and so on with subsequent annual lotteries.

The record justifies and AFC again recommends that the Board adopt a nonresident take provision which allows for harvest levels based on conservative estimates of 5% of the number of young produced annually in Alaska by each species. The nonresident harvest provision should allow for the capture of nestling raptors. The provision should not contain prohibitions which would absolutely prevent individuals who were successful in drawing a permit in any given year from re-applying for an excessive period of time.

Thank you for the opportunity to provide additional comments on this subject.

Sincerely yours,

Lee R. Grater

President, AFC



Submitted By  
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Submitted On  
2/28/2014 1:02:44 PM  
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March 8, 2012

Alaska Board of Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
via fax: (907) 465-6094

**Subject: March 2012 RC on Proposal 40 – Permits for Falconry - Allow Nonresidents to Take Raptors for Falconry : Comment on the Proposal Contained in Public Comment # 201**

Dear Ladies and Gentlemen of the Board:

This RC is to comment on the raptor nonresident take proposal contained in PC 201 and to reaffirm that Proposal 40: was drafted with the assistance of Alaska falconers in order to address many of the concerns addressed by same; represents an extremely conservative path to introducing nonresident raptor take into Alaska; and provides a balanced, sensible approach that if adopted, should be able to withstand any constitutional challenges. Conversely, it appears that many of the PC 201-proposed additional restrictions on nonresidents are constitutionally unworkable unless such restrictions are also placed on residents.

Since many of the conclusions in PC 201 are not supported by scientifically or rationally based arguments, we respectfully suggest the Board consider the information in this RC; and, if necessary, rather than rushing towards piecemeal adoption of selected provisions as suggested in RC 117, it is suggested that the Board again table the entire matter until the next meeting. We believe the Board will adopt a better, more defensible product once they have had ample time to comprehensively weigh the outstanding nonresident take issues, including the conflicts that would exist between the several nonresident proposals and the recently adopted Alaska falconry regulations and any necessary legislative action that may be required.

AFC's specific comments on restrictions proposed in PC 201 are as follows:

**1) Item 2. Legal Considerations** on page 4 of PC 201 concludes that "*Non-resident take may be restricted as the state sees fit.*" Just prior to the conclusion, the text of Item 2 more correctly states "*States may **reasonably** [emphasis added] restrict such non-resident activity ....*" In the case where there is no measurable effect on a resource by residents and no restrictions are placed on such residents, but it can be demonstrated that the addition of nonresident harvest pressure will likely have a detrimental effect on the resource, it is reasonable to place restrictions on nonresidents only to the extent necessary to protect the resource. If however, there is no measurable effect on the resource from the combined harvest of both residents and nonresidents, it is unreasonable to place restrictions on nonresidents unless those same restrictions also are placed on residents.

**2) Sub-item a. Logistics of Item 3. Administrative Considerations** on pages 5 and 6 of PC 201 concludes that "*Alaska should anticipate considerable non-resident alien interest in raptors.*" If by alien, the writer means non-U.S. aliens, AFC would agree. If, however, alien means nonresident U.S. citizens, AFC disagrees. The records across the U.S. of raptor harvest by nonresidents, examples of which are contained in Proposal 40, support that nonresidents exert no measurable effect on any resident raptor populations, including populations where no quotas are placed on either residents or nonresidents. The raptor resource management strategy contained in the USFWS Environmental Assessment (EA) that accompanied the recent modifications of the federal falconry regulations was designed to ensure that an extremely conservative harvest level below 5% of the wild raptor populations would not occur through an annual 2-bird from the wild quota placed on each and all U.S. falconers. RC 201 supports this contention when it states "*The regulations the Board adopted last month recognize the self-limiting nature of falconry take of raptors ....*" The EA actually argues that a 20% harvest is sustainable. This is because 50% of first-year birds and another 50% of second year birds (combined 75% of wild raptors) are lost from the population through natural selection.



**3) Sub-item c. Permit Allocation of Item 3. Administrative Considerations** on page 7 of RC 201 aptly states "... *there are no biological concerns for non-resident take equaling or even exceeding (within reason) resident raptor take ...*" In the second part of it is stated "... *we are aware of no other Alaska hunting seasons where non-residents are allowed to take more animals than resident.*" This is an illogical method for setting quotas for a specialized harvest that from the start represents no measurable impact on a resource. Furthermore, recalling the EA discussion in Number 2 above, Alaska resident harvest within Alaska is far below the 2-birds per falconer per year federal no-impact quota. If Alaska residents harvested at the no impact levels, that would constitute 80 birds per year, a level that is still not measurable when one considers the extremely large magnitude of the Alaska raptor resource.

**4) Sub-item a. Protection of Eyries of Item 4. Other Considerations** on pages 7 and 8 of PC 201 contains the most unsubstantiated claims and conjecture of that entire RC. While it is true that "... *large falcons tend to reoccupy select sites repeatedly*" and "*Falconers have long held known eyrie locations closely,*" there is no basis in fact or reason to conclude that the act of harvesting nestling falcons has any impact on individual falcon pairs or populations. Contrary to the assertion in PC 201 that "*Cliffside scrapes with features favorable to large falcons are unusual,*" Alaska has a huge abundance of suitable nesting sites for large falcons; which are the very reason large falcons are common in Alaska.

There are many examples of large falcons being subject to severe disturbance, whereupon they relocate to nearby alternate nesting sites and successfully complete nesting cycles and then return to the original eyrie the following year. Such disturbance occurs naturally when predators discover and decimate one or all of the eggs or nestlings and anthropomorphically when bridge-, building-, etc.-nesting falcons are disturbed or even displaced during building, bridge, etc. maintenance or other human activities at the eyrie. During less severe disturbances such as the temporary entrance of an eyrie by a human, which is the case during nestling harvest, the adults wait it out and then resume their normal activities. Year after year 100s of young falcons are removed from eyries for banding and sampling purposes throughout the world, and year after year the nesting pairs returns to and use the same eyrie. The RC 201 author's awareness that "*One site in Greenland was determined through radiocarbon dating to have been occupied as far back as 26,000 years ago*" is no basis for concluding that the disturbance or even elimination of specific eyries is "detrimental" to nesting pairs or populations.

During the process of formulating Proposal 40, AFC worked with several Alaska falconers and incorporated their desire to protect certain locations and eyries customarily utilized by Alaska resident falconers. This was the genesis of the inclusion of restrictions on nonresidents in certain GMUs. Even though AFC is aware of no other nonresident resource harvest scheme that locks nonresidents out of specific areas but does not apply the same restriction to residents, if there are a few other GMUs or sub-units that should be included in the Proposal 40 list, then AFC supports their inclusion.

**5) Finally, Item 5. Recommended Features Of An Alaska Non-Resident Raptor Take** of PC 201 contains some additional restrictions that are either not supported by any text or are unnecessary for accomplishing the stated goals.

**a)** As explained in Numbers 1, 2 and 3 above, there is no biological or rational justification for the Bullet 2 listed restriction of limiting nonresidents to 5 birds total annually. The Proposal 40 limits amended to include the Kodiak AC suggested revision at the January 2012 meetings are extremely conservative and will result in no measurable impact.

**b)** As explained in Numbers 1, 2, 3 and 4 above, there is even less justification for the Bullets 8 and 9 restrictions on taking only passage raptors during a Sept. 1 to Dec. 31 timeslot. Restrictions on particular GMUs or sub-units could allay some of the concerns over competition expressed in the record.

**c)** There has been absolutely no justification presented for adopting a provision that "*A successful applicant may not apply for another non-resident take permit for at least five years, whether or not he or she was successful in trapping a raptor.*" No U.S. state has such a limitation. If the intent of the provision is to manage fairness among nonresidents, there are other less drastic means for accomplishing such a goal, some of which are contained in PC 201. A reasonable alternative would be an annual lottery that ranks each entrant and then gives preference in accordance with rank in the second year, to first year entrants who did not receive permits during the first year. Second year entrants would be ranked and added to the bottom of the first-year list, and so on with subsequent annual lotteries.

In summary, RC 201 adds little if any additional information to the record before the Board on the subject of nonresident take of raptors for falconry, and the record as a whole does not appear to contain any justification for adopting nonresident take provisions much different than the extremely conservative ones contained in Proposal 40. The record justifies and AFC again recommends that the Board adopt a nonresident take provision as contained in Proposal 40 and modified by the Kodiak AC at the January 2012 meeting.

Thank you for the opportunity to provide additional comments on this subject.

Sincerely yours,

Bill Meeker

President



Submitted By  
Lee R. Grater  
Submitted On  
2/28/2014 12:59:29 PM  
Affiliation  
President, American Falconry Conservancy

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February 17, 2012

Alaska Board of Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
via fax: (907) 465-6094

Subject: Additional comments on Proposal 40 – Nonresident Take of Raptors for Falconry

Dear Ladies and Gentlemen of the Board:

The American Falconry Conservancy (AFC) understands that that the Alaska Board of Game tabled Proposal 40 – Nonresident Take of Raptors for Falconry – at their January 2012 meeting and is awaiting further input from the Department of Fish and Game at the March 2012 meetings.

AFC has reviewed the entire Alaska Board of Game record associated with the January 2012 State-wide Proposals 38, 39, 39(a) and 40 and offers additional comments for the Board's consideration to respond to some of the comments and concerns contained and expressed thus far and to augment the record with additional information relevant to the subjects. AFC again respectfully requests that the Board adopt provisions allowing nonresident falconers to harvest both juvenile free-flying and nestling raptors in Alaska for falconry purposes. All of the concerns expressed by those who commented in this record were considered when AFC worked with a number of Alaska falconers to draft Proposal 40. Many of the same concerns were expressed by other states while in the process of adopting nonresident take. However, in the years following adoption, none of the issues of concern ever arose. In fact, in nearly all cases, non-resident harvest across the U.S. has occurred without incident at harvest levels well below any of the quotas some states chose to adopt.

1) None of those who commented indicated that there is any **resource health** issue associated with nonresident take of raptors in Alaska. AFC's proposal on numbers and species constitutes a very conservative harvest rate which will have no impact on any raptor species population in Alaska. Dr. Titus and others who commented and participated in the Board's discussions and deliberations agree with AFC's assessment. A number of those who commented suggested greater numbers and additional species beyond those suggested in Proposal 40 should be allowable, and we agree that even a much less restrictive harvest rate will have no impact on Alaska's wild raptor resource. The Kodiak Advisory Council suggested adding several other species to the Proposal 40 list and raising the nonresident allowance for goshawks up to 10 birds per year, and AFC would concur.

2) Several of those who commented suggested that nonresidents have a **history of illegal activities** that could tarnish the good reputation of resident falconers. One who commented suggested nonresident take would encourage "black market" activities. However, no examples of such purported illegal activity were provided. In fact, U.S. falconers at-large are a very dedicated group, who individually and collectively have worked very hard to be able to pursue our sport within a framework of what may be the most complex set of regulations among all hunting sports, especially in regards to nonresident, inter-state migratory bird activities, which bring into play even more federal laws and regulations. The clean records of falconers across the U.S. support with very few exceptions, that the U.S. falconry community is an extremely reputable, law-abiding group of sportspersons.

3) A few of those who commented suggest that harvest should be restricted to passagers (juvenile birds capable of flight) and **exclude eyasses** (nestlings). One of those who commented suggested that passagers are readily available and so there is no need to allow eyasses. For a number of reasons, AFC and several others who commented continue to maintain that there is no biological or other justification for placing restrictions on either passager or nestling harvest. Furthermore, many falconers favor the behavioral disposition of eyasses; birds raised from an early age more easily and swiftly integrate into human social settings, which include family activities, hunting dogs, traffic, etc. than do their passage counterparts. Additionally, in contrast to a commenter's assertion, for a number of reasons



passagers of a desired species are much less likely than eyasses to be encountered, let alone captured. Firstly, you their nest site areas in late summer and most of them end up residing in or migrating through remote, road-less regions of the state. Secondly, Alaska's geographic features do not concentrate migrating raptors down predictable corridors as is the case elsewhere in the lower 48 states; this is why a number of Alaska falconers have come down to the lower 48 to harvest raptors. Finally, passager movement is associated with unpredictable weather patterns, which makes planning nearly impossible for nonresidents.

4) One commenter testified that large falcon species are known to use the same nest site for many years and insinuated that **repeated harvest from a particular nest site** would be detrimental. However, the commenter provided no evidence to support that such activity would affect the species population or even the falcon pair's reproductive success. The testimony on this subject was incomplete in several important ways. Firstly, there was no evidence presented that indicates repeated harvest by residents has had such an affect. Secondly, species as a whole and individuals within a population are programmed through evolution to reproduce in order to perpetuate their kind regardless of whether a particular ledge or crevasse continues to exist. Birds, including raptors readily utilize alternate nest sites to complete their nesting cycle when necessary, and there is no indication that nesting habitat is in short supply within the vastness of Alaska. Finally, federal and all other state nesting raptor harvest provisions prohibit the removal of all the nestlings from a particular nesting site, a provision that was authored by falconers in order to allow a pair to complete a full nest cycle and minimize nest site abandonment. Dr. Titus provided information that indicated repeated harvest of juvenile prairie falcons had no effect on the populations.

Finally, as the Board is likely aware, the proposed language in 40 would conflict with the approved compromise version of the Falconry Manual with respect to exporting birds. It appears the Falconry Manual provisions on this subject would need to be modified to allow nonresident take. Should the Board approve nonresident take and the Falconry Manual be reopened, AFC recommends that the present restrictions that prohibit Alaska resident falconers from export birds be loosened up. Here too, there is no biological justification for a no-export provision.

Thank you for this opportunity to provide comment and clarification of the record.

Sincerely yours,

Bill Meeker



Submitted By  
April  
Submitted On  
2/27/2014 11:42:24 AM  
Affiliation

**I strongly support Proposal 172** which would remove black bears from the classification of "furbearer" species in the state's wildlife management regulations.

My reasons:

- \* Scientists overwhelmingly agree that bear snaring is indiscriminate, cruel and not biologically sustainable. I agree with them.
- \* Because bear snaring is indiscriminate, females with dependent cubs and cubs themselves are at risk. Grizzly bears and other non-target species are caught and killed in snares. Bears have one of the lowest reproductive rates and it is for this reason modern scientific management principles discourage killing females.
- \* Snaring is egregiously wasteful. There is no requirement that meat from bears killed in snares be salvaged for human food. They are being killed for the simple purpose of decimating yet another predator species. Shame on humans for this.
- \* Snaring is an extremely controversial method of killing wildlife, regardless of the species targeted. The BOG tarnishes Alaska's image for residents and non-residents alike by insisting on continuing its cruel and unnecessary war on predators. Bear snaring has never been allowed in Alaska since statehood - until the BOG approved and implemented an experimental snaring program in 2010.
- \* No other state - among the few still fortunate enough to have bear populations - classifies the animals as furbearers.
- \* Snaring creates dangers for other consumptive users, hikers and their pets 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 extremely dangerous.
- \* Snares are allowed as close as ¼ mile beside maintained trails and roads used by the public. A bear investigating a baited snare could cover ¼ mile and attack an unsuspecting hiker in as little as 30 seconds - an unwarranted and unacceptable danger to the public.
- \* 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. Bears are wonderful and there is no need to kill them; doing so is wrong on so many levels.



Submitted By  
Arnold Voigt  
Submitted On  
2/8/2014 2:03:10 PM  
Affiliation

I support proposal 104 in that harvesting a sustainable amount of grizzly bear over bait would be an excellent way to control moose predation



Submitted By  
Beverly Minn  
Submitted On  
2/26/2014 2:39:36 PM  
Affiliation

I urge the Board to support Proposal 172. I'm not a fan of snaring because it's nondiscriminating and there is too long a period of suffering prior to an animal's death.



Submitted By  
Bob Gengler  
Submitted On  
2/28/2014 2:19:17 PM  
Affiliation

Oppose Proposal 172

While I would prefer to write a detailed opposition to this proposal as well as many others that are adopted every year by the BOG, I will not waste either my or your time as we all know that once the BOG has its mind set it proceeds despite lack of scientific or general public backing.

Having said that, there are few reasons to pass this proposal. Unless trapping is fully regulated, with all traps being marked in some way to signify the owner / setter of the trap, then it should not be allowed in general. Each year several pets are killed by traps and there is not one ounce of accountability by the trapping community.

Unless AK has some great knowledge that no other State seems to possess, then bears are not "fur bearers" and should not be treated as such. Trapping is very indiscriminate and unless the trapper checks his traps frequently, the bear will suffer. I know that the suffering of a bear means nothing to the BOG however.

I could list many more reasons, but again prefer not to waste my time. The BOG is a shame and continues to promote non sustainable, non scientific, and barbaric hunter / trapper driven agendas.



Submitted By  
Carol Biggs  
Submitted On  
2/26/2014 10:39:28 AM  
Affiliation

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PO Box 20271  
Juneau, Alaska 99802

Please vote "YES" to stop black bear snaring, Proposal 172.

Carol Biggs



Submitted By  
Charles Piper  
Submitted On  
2/27/2014 9:27:50 PM  
Affiliation

In regards to proposals 151 through 155 concerning migratory waterfowl hunting: all of these proposals are fully addressed by Federal regulations and therefore do not need to be changed. Additionally, these proposals are unnecessary, unrealistic, unfair and impractical.



Submitted By  
Charles Summerville  
Submitted On  
2/28/2014 6:34:21 PM  
Affiliation  
Resident duck hunter  
  
Phone  
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[alaska.charlie@gmail.com](mailto:alaska.charlie@gmail.com)  
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462 teal way  
Kodiak, Alaska 99615

Please Make sure this gets to the board making the decisions on **Migratory Bird hunting** Proposals

Proposal #151 - Migratory Birds --- Guides keeping Migratory log books

**Strongly Oppose** this recommendation

Due to a couple simple reasons

1. Budget restraints and fiscal responsibility, this is just another example and layer of wasted money that would be spent and would not accomplish anything, Just to appease a fringe group of antihunters specifically discriminating against Sea duck hunters and Sea duck hunting guides to further there own crusade against Duck hunting guides in ALaska. Especially when most of the guides are already controlled by other federal agencies and state agencies, and many of them submit reports already to hunt on federal lands.
2. The logs are too intrusive and not needed as the state already sells ak fishing and hunting license information of everyone and they already have names and addresses of these people, Its pretty pathetic when a man cant go duck hunting in alaska without big brother over your shoulder, As this is not big game hunting with hundreds of thousands of dollars at stake its a very small limited group of hunters being discriminated against.
- 3.This will not help the resource in any way
4. Nothing will happen if this is not changed as the populations of Seaducks are not in any problem as of now.
5. **This will not help the quality** of the resource, as our state agencies are already burdened with too much paperwork, and the state would have to hire additional secretaries and administrators to manage this new proposal.
6. **The only ones likely to benefit** are the antihunters and Mrs Hillstrandt and her troop of merry Anti's since this is her persoanl agenda to shut down all seaduck hunting in ALaska.
7. **WHO suffers is everyone**, Guides, hunters and the state being forced into more unneeded paperwork and regulation to gain nothing, as if the state wants us to send in a year end report they can ask us too and we would, but comparing this too big game hunting and contracts is simply not needed just to be able to harvest 4 seaducks per day per hunter with a total of 20 per year.
8. **Other solutions to consider** - a simpler year end report with total birds harvested and total # of hunters Resident vs Nonresident if the state feels its needed.

Sincerely Charles Summerville III

Licensed Waterfowl Guide

Kodiak ALaska



Submitted By  
Charles Summerville  
Submitted On  
2/28/2014 7:53:56 PM  
Affiliation

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#### ##### Proposal # 152- & 153 Migratory Bird Hunting

##### **Strongly Oppose modifying the definition of edible meat of waterfowl #152**

##### **Strongly oppose definition change of a hindquarter #153**

And leaving as it is as it is very clear to everyone involved, and changing this to match the big game hunting requirements is not needed. If a hunter chooses to take more of the leg or head or neck meat it is his choice but he should not be forced to, As there is no other state in the US that requires this and would be very confusing to duck hunters.

It will not effect the quality of the resource except in a negative manner trying to deal with contaminated meat from whole birds that have been plucked in the field, As the way it is now is very simple,

If this is changed - It is just one more problem the troopers have to deal with trying to sort through a bag of ducks when it will come down to grams of meat.

example -Considering a black scoter male Sea duck

weigh about 850-900 grams or around 2 lbs , the leg meat of a scoter is approximately 5 grams each,

The total breast meat is approximately 90 % of all edible meat so this proposal will save around 10% more meat that is questionable at best or 15-20 Grams total. Do we really have nothing else to do with our law enforcement than to run around and weight grams of meat on a drug scale.

There is a reason the world considers the breast meat edible, and not the neck,rib and legs of ducks.

The world will go on if 10 grams of marginal neck,rib or leg meat of a seaduck dont get utilized considering they usually are the area that get shot and destroyed while hunting as they are underneath.

In General another absurd proposal from Anti Duckhunters. That will do nothing positive for anyone as hunters who want to pluck a whole duck and cook them can already do it.

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#### ##### Proposal #154 Modify trophy to include salvage of all edible meat to include Waterfowl.

**Strongly oppose #154** making Wlldfowl a trophy animal the same as other big game animals.

This proposal is absurd that a duck hunter has to meet the same requirements as a big game hunter, The law is clear already that all edible meat has to be salvaged which is defined as the breast meat, Changing waterfowl to trophy status and completely skinning or plucking an bird does not make any common sense in the field, where in practical terms breasting out a goose and leaving a wing attached for identification is already in place and works fine, This proposal is just 1 more example of anti hunters and a personal agenda against duck hunters by a small group of antihunters trying to take our rights away by eroding 1 piece at a time. In their confusing proposals that no one can understand or Enforce.

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#### **Oppose Proposal #155 modify possession limits for migratory waterfowl**

I strongly oppose modifying the possession limits, as they are already in place and working

example of why not to accept this proposal if i go to duck camp for 5 days with my son, I will have to eat all our ducks every day before i can go back out and hunt the next day, Again this is ridiculous and very confusing the way it was written.

And it seems that again it is targeting duck hunters and guides making it very hard to go on a 3-7 day hunt in Alaska without breaking



some sort of rule,

2. This proposal just seems to be very confusing and unneeded as for example.-

1 duck hunter can harvest 8 ducks per day with no more than 24 in possession according to AK law , there is no way possible for 1 hunter to eat 8 ducks per day for 3 days straight just so he can keep hunting, I guess the people writing these proposals never store food for the winter and hunt to feed members of there family when they return from a hunt.

The existing laws are very clear and enforcable, this proposal or law if passed would domore harm just the opposite as the anti hunters are suggesting, as hunters would waiste and throw out ducks so they could keep hunting if they were on an extended 3-7 day hunt vs preserving and freezing them for future consumption.

Now we have to call the Food police to monitor how many ducks we eat each night and prove it, when will the madness stop from the antihunters .

Thank you for taking the time to read my opposition to these Migratory Bird laws as they seem very absurd to me and have no legitimate data backing any of them up just general statements just to hurt Duck hunters in ALaska.

Sincerely Charles Summerville

907-512-0810

Owner :**Alaska Trophy Adventures Lodge**-King Salmon

**Aleutian Island Waterfowlers** - Adak-Kodiak-St Paul-Coldbay



Submitted By  
Chris Baumung  
Submitted On  
2/26/2014 10:33:14 AM  
Affiliation

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1299w 64th  
Anchorage, Alaska 99518

I am strongly opposed to Proposal 172. This bear snaring idea is another terrible idea to eradicate predators in our great state



Submitted By  
Chris Foster  
Submitted On  
2/9/2014 10:27:20 AM  
Affiliation

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Proposal 39: I support a non-resident cap of 90% of available sheep drawing permits. I'm an Alaskan transplant from Washington State where they manage their Bighorn sheep with limited non-resident drawing participation. I've hunted sheep in the Brooks, Talketnas, AK Range, and Chugach Mountains. The opportunity to hunt healthy sheep populations is a privilege of residency that should be protected in the special drawing permit areas. I've hunted the DCUA and 13D drawing units and would like protections in place to increase opportunity for resident sheep hunters.

Proposal 41-43: I support the early opening of sheep seasons for residents. I hunt with my children and travel from SE Alaska to hunt. It would be beneficial to do hunts before school starts. It would also give opportunity to teachers to participate in a sheep hunt before teaching.

Proposal 44: I oppose the conversion of all non-resident general sheep hunting opportunity to drawing.

Proposal 112-113: I support Youth drawing permit changes. I look forward to hunting with my children as it is quality family time and increasing opportunity in the area is a win-win.



Submitted By  
Christopher Newgren  
Submitted On  
1/15/2014 11:25:45 AM  
Affiliation

To whom it may concern,

I would like to comment on proposals 152,153,154,and 155.

First off I am against all four of these proposals. These proposals make it harder to process game meat and I feel it will lead to more wasted waterfowl meat by those storing them to be cleaned later versus those just removing the breast meat which makes up the majority of the meat anyway and is easier to clean and keep cool. Game meat stored as uncleaned birds will potentially be wasted as whole birds not properly cleaned waiting for a person to arrive at a processor or a residence of someone who will clean them could spoil in the process.

I also wonder how a person can count game birds once made into sausage or stew especially once partially eaten. Say 6 ducks go into a given food item that is partially consumed and the rest frozen.

How does one identify how many of the said ducks remain in the stew pot or as sausage etc..?

I feel this proposal also goes against Alaskan's traditional harvest methods. Alaskans have always put up meat and fish for the winter. With this proposal that will not be possible and goes against Alaska's traditional hunting and subsistence practices.

Please toss out these proposals as they are unwarranted and go against Alaska's traditional values in hunting.

Sincerely,

Chris Newgren



Submitted By  
Christopher Strub  
Submitted On  
1/23/2014 1:03:00 PM  
Affiliation

Regarding proposal 133; I find that if a shooting proficiency test is required for the certification, certified personell need to be available in more communities in Alaska. I am an advocate for hunters safety but I dont think adding a step that would hinder an individuals opportunity to hunt or provide food for their families is reasonable. I live in Dillingham and would voluntarily sing up for this certification if it were to be provided locally.



February 28, 2014

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

**RE: Proposal 177 – 5 AAC 92.080(4) & (5). Unlawful methods of taking game; exceptions, and 92.990 (70) Definitions.**

Dear Alaska Board of Game:

My name is Claude Wilson Jr.

I live and hunt in game unit 23 as a subsistence hunter and I have hunted for the past 35 years to supplement my family's food needs. The use of a snowmachine has been my primary source of transportation while hunting to get caribou, moose and other animals to fill my freezer. I am for proposal 177.

Thank you for considering my needs.

Claude Wilson Jr.

*Claude Wilson Jr.*  
Box 7417  
Kotzebue, AK 99752



Submitted By  
Dale Hall  
Submitted On  
2/27/2014 10:40:12 AM  
Affiliation

Phone  
907-841-2396

Email  
[falconr58@gmail.com](mailto:falconr58@gmail.com)

Address  
Po Box 3835  
Soldotna, Alaska 99669

I support the ALaska Falconers Assocation white paper for the NON-RES Take!!!

I DO NOT support PROP 174 in any way!!



Submitted By  
Darin Noorda  
Submitted On  
2/28/2014 8:45:15 AM  
Affiliation

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630 S 100 W  
Garland, Utah 84312

Dear Alaska Board of Game and Fish,

I am writing these comments in concern with some recent proposals by a fishing company and their allies is mucking up the rules for waterfowl hunting. I have traveled several times to Alaska in pursuit of harvesting waterfowl. Some of those trips have been for "trophy" hunting and some have been for the pure pleasure of pursuing birds that are not in the state i reside. I acutally have a trip planed this next winter to go back to waterfowl hunt. The great thing about this trip is I am bringing 4 additional friends who have never hunted waterfowl in Alaska. We will be bringing our \$\$ with us to spend in your great state. All said we will spend over \$20,000 just to hunt ducks. So with that said let me get to the points of concern.

#### Proposal 151

Waterfowl bird numbers are tracked very extensively by the USFWS. Each spring the Feds gather counting data and each year they track to the best of ones ability harvest data. Why does the Alaska F&G need to track the harvest of sea ducks by Guides. I tend to think that Alaska has a very small number of "waterfowl" guides who are actively booking clients. Considering the miles of coast line the ratio has to be a very large. This proposal seems to be more burdensome to the Fish and Game department and to the actual hunter/guide. As a non resident I am only allowed 20 sea ducks and no more than 4 of each species. This harvest by Non Residents is not even significant enough to count as to the number of waterfowl that enhabit the costal waters of Alaska. As i see it this is assnine regulation to burden down the guide, hunters, and the F&G dept. If this rule is to be enforced on guides. One would think that this rule should appy to subsistence hunting as well. Im sure the number of harvested sea ducks by subsistence hunting far out weighs that of legal hunting harvested birds.

#### Proposal 154

When i return from hunting waterfowl in Alaska i usually bring home a few birds to mount. These birds are shipped all over the country to different taxidermists who mount some spectacular birds. This law would require the taxidermist to send me back the meat?? These birds are taken home frozen and shipped frozen. How would the F&G enforce this? Will this proposal lead to the requirement that the hunter make pillows out of the down? Slippery slope traveling down this road.

#### Proposal 155

The Feds set the framework for posession limits and rules. With the state having leway what is the justification of deviating from the Fed set framework? Their is no confusion on the matter. The illusion of confussion is being trumped up here.

#### Proposal 156 & 157

I would like to see the data collected to justify these two proposals. Where is the data that shows the "high percentage of harvested meat spoiling"? What is the justification for this? Down here in Utah I personnally harvest well over 100 ducks a year. each bird is cleaned and later ate. The state doenst need to be in my business of what meat is in my freezer and for how long it is there.

I hope that the F&G board see's through the "mucking up of the rules" here and does the right thing by following the Federal framework and allow us hunters to carry on as we normally have. Perhaps someone should make sure the fish that the Hilstrands harvest are not put to waste. the innards need to be consumed and not thrown down the drain.

thank you for your time!

Darin Noorda

To: 907-465-6094

Re: BOG comments

For: Anchorage mtg, 3/25/14



PC24 1 of 1

February 27, 2014

To Whom It May Concern:

These comments are regarding the recent changes in the Tier I (formerly Tier II) caribou hunt.

I have been hunting Game Management Unit 13 for 60 years and I have never seen such unfairness and mismanagement in all that time. The unfairness is due to the fact that I have to hunt all game in that area if I am awarded a Tier I caribou permit. This change is completely preposterous and should be changed immediately for the following reasons:

- 1) There is too much pressure put on the hunters and the animals when there are that many hunters in one area. Yes, GMU is a large area, but there are only certain parts of it that are reachable by most hunters.
- 2) The animals become stressed by having such a huge amount of people converging at once and in such a short amount of time. The number of people increased ten-fold from years-past.
- 3) The hunters become stressed because they know there is only (for most people) a few days in which they are able to hunt for caribou and moose. Emotions run high and it makes for a volatile environment in which to hunt.
- 4) Imagine how ridiculous it would be if everyone subsistence fished on one river! The idea is the same.
- 5) My daughter spoke with a biologist at the Anchorage Fish and Game office about this issue and he told her that before this rule-change their office would receive many calls each day from people complaining about the unfairness of the point system. This way is equally unfair and makes hunting in that area very dangerous. If I hunt in GMU 13 (for the short amount of time it is open) and am unsuccessful I would like the option to go to a different area of the state and get the meat which my family depends on to sustain us through the winter.

One possible solution might be to do a strictly draw only for caribou – award the same amount of permits but make it a draw-only hunt (without the restriction of having to hunt for EVERYthing in that area).

Another possibility would be to lessen the restrictions on the taking of bull moose.

Thank you for your time and consideration in this matter.

Darrell Hill (avid Alaskan hunter since 1952)  
907-717-9807  
d-r@gmail.com



Submitted By  
David K. Carl  
Submitted On  
1/31/2014 3:33:36 PM  
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Central Bering Sea AC Kipnuk Representative

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1/29/2014

Re: Proposal 6 (Arctic/Western BOG proposals)

---

I strongly push that there be more permits given to the villages, due that the population of the muskox that is truly giving. They are roaming all over the YK Region, now even above Bethel.

When the Muskox's get over populated, ADFG has the ability to kill them with good cause after they have been watched closely. People do not have the control over mother nature, but we are given the rights to subsistence what mother nature provides.

I don't want to see the Muskox become wiped out as the history of the bufflo, I do want to see the muskox populations grow to where we can subsistence hunt muskox regularly with more permits given to the people who mainly rely on them for subsistence use.



Submitted By  
Dennis Abrams  
Submitted On  
2/28/2014 3:13:02 AM  
Affiliation

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Proposal 151,152, 153, 154, and 155

I am opposed to all of the above listed proposals.

Explanation. All are unnecessary.



Submitted By  
Diane Brandstetter  
Submitted On  
2/26/2014 6:57:48 PM  
Affiliation  
Interested Person

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Indianapolis, Indiana 46220

Please vote yes to proposal 172 to stop black bear snaring.

Living healthy bears are a tourist attraction and a source of revenue for the State of Alaska. My husband and I will not vacation in Alaska until the Board of Game does more to protect Alaskan wildlife like bears and wolves. We strive to encourage our friends to become educated to proposals like bear snaring, treatment of wolves, etc and to avoid visiting Alaska until the state protects their unbelievable diversity of incredible wildlife.

Bear Snaring:

1. Bear snaring is indiscriminate, cruel, and an unacceptable way to manage wildlife. Man should be a protector not a destroyer.
2. Bears have been incorrectly classified as a "furbearer" which allows trappers to catch and kill the animals using disgusting and inhumane snares.
3. Non targeted animals are caught and killed in this hideous method.
4. Snaring is a danger to pets and humans who are unaware of the snare traps.
5. Snaring is not biologically sustainable for a species. Bears have a low reproductive rate. Snaring further diminishes bear populations.
6. There is no requirement that bear meat be used as human food. This is wasteful and unacceptable.

Civilized, compassionate, intelligent people should not engage in this despicable behavior to manage wildlife! Cruelty is never acceptable when there are other ways to manage wildlife. Alaska can do better than this. Alaska can make better choices that serve as models for scientific factual humane management of wildlife. Indiana where I live is a good example of how not to manage and protect predators. They're all gone. Please do not make the same mistakes we did!

The world watches what you do. Please vote yes to proposal 172 to stop black bear snaring.

Diane Brandstetter  
5670 Carvel Ave  
Indianapolis, Indiana 46220  
317-257-8721



Submitted By  
Don Hunley  
Submitted On  
2/28/2014 7:54:06 AM  
Affiliation  
Alaska Falconers Association  
  
Phone  
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Address  
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Comments Re: BOG Proposal #174 Non Resident Falconry Take

Members of the Board of Game,

Thank you for taking the time to read my request. My name is Don Hunley. I am an avid hunter, fisherman and master falconer. I have been a resident of Alaska for 31 years. I am a retired AF Master Sergeant and am currently a 14 year career fire fighter in Anchorage. I am a part time assistant hunting guide. I have been a Director for the national falconry organization, North American Falconry Assoc. (NAFA) I am currently the Southern Region Vice President of the Alaska Falconers Assoc. I wanted you to know I am vested up here and have a real concern for the health and welfare of all our wildlife resources in Alaska.

I would like to express my support of proposal #174, Non Resident Falconry Take. There are no reasonable biological objections to this proposal. I would however, like you to consider an amendment to this proposal. I would request that there be a take of large falcons only some distance from the road to protect local falconers interests. my amendment would be:

“LARGE FALCONS WILL BE TAKEN A MINIMUM OF 5 MILES FROM A ROAD SYSTEM”

Local falconers are concerned about non residents coming up and competing with them in the take of the most accessible eyries (nests). This is a valid concern and a 5 mile corridor would protect those vulnerable eyries and still allow access to goshawks, red tails, etc. that are not a concern of local falconers. It would also follow the current precedent of the Haul Road corridor for bowhunting which would be recognizable to most everybody in the state.

There were concerns about trespass on native lands, but the proposal clearly spells out that access to native land must be approved by the native corporation. There are concerns about smuggling, etc. these are ALREADY illegal activities and if someone is willing to carry out an illegal activity, they will do it regardless of the rules that are in place.

I also believe it is critical that an eyas (nestling) take be allowed. A passage only take of falconry birds is almost not granting a take. I currently have 2 apprentices that have been trying to take a passage hawk since August, with no success. These are resident falconers that live up here and it is still very difficult. Taking a eyas would give access to all the hawks that have been requested. I believe passage peregrines cannot be taken at all, and therefore, a passage ONLY take would not actually even be a take for peregrines.

I believe there are some other paperwork concerns like permitting, fees, administration of the program, etc. that go beyond the scope of my ability or need to address in this request.

Someday, if I ever leave our great state, it would sure be nice to be able to come back up with a non resident permit in hand and take a bird while spending a great week with my buddies up here. This proposal would at least give me the opportunity to do that.

I wanted to keep this simple, short and sweet so you would actually have the time and inclination to read it. As I said before, there is no biological reason to not have a LIMITED non resident falconry take. Much of what we tout as falconers is that we leave a nearly non existent footprint biologically. This would be true for a small non resident take as well.

Thank you so much for your time, please contact me if you have any questions and I will do my best to answer them I realize falconry is a tough subject because so much of it is unknown to non falconers.

Don Hunley

907 350-9172



Submitted By  
Duane Howe  
Submitted On  
2/27/2014 11:32:38 PM  
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I want to support Proposal 172 on page 246 which would remove black bears from the furbearer classification and return them to big game as they should be. I am a former wildlife biologist and know of no other state that classifies black bears or any other bears as furbearers. The only reason for naming them furbearers was to enable snaring, which is a disgustingly cruel way to kill wildlife of any kind. There is no way to prevent the killing of sows by snaring, which is very wasteful. If the sow has a cub at the time the cub will also be lost, which is even more wasteful. Snares are also dangerous to humans and their pet dogs that often get caught in traps accidentally and seriously injured.

There is no need to kill bears by snaring. The only excuse is really to reduce the number of predators even though it cannot be shown that black bears seriously reduce the numbers of any game animal species. Bears are one of the wild animals that many people come to Alaska to see. Most people understand hunting, but if it were generally known that bears were being killed cruelly in any way many tourists would be turned off by it and reconsider their trip to Alaska.

I hope you will reconsider using trapping of any kind to kill black bears.



Submitted By  
Dutch Overly  
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2/20/2014 8:47:10 AM  
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AFA

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Non-Resident take of Raptors should be regulated the same as Non-Resident take of Big Game. An application for a drawing permit should request proof of Alaska Hunting License and Falconry Permit from their state. Just like Drawing permits, a lottery will be held for a limited number of permits at cost determine by Fish & Game to cover all cost associated with these permits. Alaska Fish & Game would handle these takes to make sure no impact to the Raptor population in Alaska and to include destruction of nest sites.



Submitted By  
Ed Schmitt  
Submitted On  
2/27/2014 6:34:23 AM  
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I am in strong support of proposal 172. We should not consider snaring bears for any purpose.



Submitted By  
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2/26/2014 11:01:22 AM  
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~~Vote "Yes" to Stop Black Bear Snaring

Proposal 172 (page 246), submitted by AWA and authored by former AWA Board member and current Advisory Board member Valerie Connor, would remove black bears from the classification of "furbearer" species in the state's wildlife management regulations. The BOG changed the bears' species classification from "big game" to "furbearer" in 2010, thereby allowing trappers to catch and kill the animals using snares.

\* Scientists overwhelmingly agree that bear snaring is indiscriminate, cruel and not biologically sustainable.

\* Because bear snaring is indiscriminate, females with dependent cubs and cubs themselves are at risk. Grizzly bears and other non-target species are caught and killed in snares. Bears have one of the lowest reproductive rates and it is for this reason modern scientific management principles discourage killing females.

\* Snaring is egregiously wasteful. There is no requirement that meat from bears killed in snares be salvaged for human food. They are being killed for the simple purpose of decimating yet another predator species.

\* Snaring is an extremely controversial method of killing wildlife, regardless of the species targeted. The BOG tarnishes Alaska's image for residents and non-residents alike by insisting on continuing its cruel and unnecessary war on predators. Bear snaring has never been allowed in Alaska since statehood - until the BOG approved and implemented an experimental snaring program in 2010.

Sincerely,

Eileen Bosch



Submitted By  
Gary Hampton  
Submitted On  
1/28/2014 9:23:47 AM  
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I am for the non resident passage take of of a limited number of hawks and falcons in Alaska.

thankyou

Gary Hampton

Fairbanks Alaska



Submitted By  
George M Decker  
Submitted On  
2/12/2014 8:33:52 AM  
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Falconry permit holder

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In regard to non-resident falconers being able to take birds in Alaska, as a falconry permit holder I am opposed to the proposal. It would open the flood gates for outsiders to upset the already delicate balance of raptor populations>



Submitted By  
Isaac Vanderburg  
Submitted On  
2/27/2014 1:22:39 PM  
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Please put an end to bear snaring in Alaska.

- \* Scientists overwhelmingly agree that bear snaring is indiscriminate, cruel and not biologically sustainable.
- \* Because bear snaring is indiscriminate, females with dependent cubs and cubs themselves are at risk. Grizzly bears and other non-target species are caught and killed in snares. Bears have one of the lowest reproductive rates and it is for this reason modern scientific management principles discourage killing females.
- \* Snaring is egregiously wasteful. There is no requirement that meat from bears killed in snares be salvaged for human food. They are being killed for the simple purpose of decimating yet another predator species.
- \* Snaring is an extremely controversial method of killing wildlife, regardless of the species targeted. The BOG tarnishes Alaska's image for residents and non-residents alike by insisting on continuing its cruel and unnecessary war on predators. Bear snaring has never been allowed in Alaska since statehood - until the BOG approved and implemented an experimental snaring program in 2010.
- \* No other state - among the few still fortunate enough to have bear populations - classifies the animals as furbearers.
- \* Snaring creates dangers for other consumptive users, hikers and their pets 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 extremely dangerous.
- \* Snares are allowed as close as ¼ mile beside maintained trails and roads used by the public. A bear investigating a baited snare could cover ¼ mile and attack an unsuspecting hiker in as little as 30 seconds - an unwarranted and unacceptable danger to the public.
- \* 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.

Thank you -

Isaac



Submitted By  
J.R. McCulley  
Submitted On  
2/27/2014 10:55:56 AM  
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Dear Sir or Madam,

It is my opinion the Proposals 151-155 concerning changes to waterfowl regulations are unnecessary. Alaska is truly a waterfowlers paradise with strong, stable populations of both sea ducks and puddle ducks.

Changes such as these will make Alaska less attractive to visiting waterfowlers. While waterfowling may not have the economic impact that fishing and big game hunting have, it can be a good boost to local economies such as Cold Bay and St. Paul.

These changes would also have a large impact on outfitters and guides in the state. Alaska has the best outfitters and guides of anywhere I have been. In many ways they are the first line of defense in wildlife management. It does not make sense to make unnecessary changes that would hurt their business.

In closing, I am concerned that these proposals were made by someone not in the conservation or wildlife management field. While they may have good intentions, it is best to leave these decisions up to those who have dedicated their lives to our natural resources. If natural resource managers and outfitters are not raising concerns then there should be no need for these changes.

Best Regards,

J.R. McCulley



Submitted By  
Jeff Meyer  
Submitted On  
2/28/2014 4:10:31 AM  
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Proposals 151-157 are nothing more than anti-hunting organizations trying to put more limitations and regulations on waterfowl hunting in your state. Passing these proposals will be hard to enforce and will cost the state millions of dollars in lost revenue from out-of-state bird hunters.



Submitted By  
Jeffery Curtis  
Submitted On  
2/3/2014 10:37:37 AM  
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As a hunter from Toksook Bay, I would like to keep it the same as it is now. I like option 3.

Option 3: Registration Permits Available in Nelson Island Communities (unissued permits in other communities)

Continue with a registration hunt and allow the majority of permits to be available in the villages on a first-come-first-served basis. Similar to what is currently done with the caveat that any permits not issued in the village they would be offered over the counter in Bethel on a first come first served basis.



Submitted By  
Jeffrey Wasley  
Submitted On  
2/27/2014 10:19:14 AM  
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#### Comments for Proposal 151

This proposal will cause an unnecessary waste of time and resources for both the Alaska Dept. of F&G and waterfowl guides in Alaska. The Alaska Dept. of F&G Statewide Waterfowl Program already surveys waterfowl guides for:

- A. # of clients
- B. What % of clients are residents, nonresidents or foreign
- C. What other guiding are the guides involved with, Fish, Big Game, Both or Other
- D. Do you offer special hunts for: Geese, Sea Ducks, Cranes, Dabblers/divers, Other
- E. How many of the following did your clients harvest during the season for: Geese, Sea Ducks, Goldeneyes, Bufflehead, Cranes, Dabblers, Divers.

Basically guides already fill out extensive data for the AK Dept. of F&G for the same data that this new proposal is asking for. This would be a huge waste of time and money for all involved and not provide any significant gain in data for management, it would actually hurt management of our resources by using more money for duplicate data. This would also cause undue strain on waterfowl guides who are bringing in tourism money for the state of Alaska. Most species of waterfowl are actually increasing or at a minimum holding steady. The 2013 US Fish and Wildlife Services comprehensive survey counted a record number of waterfowl. Highest ever!! We need to look at real science and survey counts and not listen to singular folks with strongly biased personal opinions. This is a personal attack by a small group of folks against a responsible and important industry for Alaska's tourism. Many guides also conduct hunts on highly managed areas and submit daily hunting records to the US Fish and Wildlife Service.

#### Comments for Proposal 152

Wasting of game meat is a crime by law, and worse yet it is a shame for hunters to waste wild game meat. No matter how careful, some small amount of meat will not be salvaged. This is the case with small game like waterfowl. Waterfowl are shot by multiple pellets that due damage some meat. Also, waterfowl are very different in their anatomy compared to mammals. Flight requires an incredible amount of strength(muscle=meat) that comes from the breast muscle. Anyone who has cleaned a duck knows this and that is why current Alaska law requires hunters to salvage the breast meat of waterfowl. On mammals the muscles are spread out and that is why law requires the salvage of a extensive list of muscle groups. On many waterfowl species even the breast meat is very small and the only salvageable muscle. A field dressed Green Wing Teal, which is one of the most highly harvested species in Alaska, often weighs less then a half pound. Many field dressed Mallards would weigh less then 1.5 pounds and they are the largest of the commonly shot ducks. This is definitely a case of apples and oranges due to the difference in size and anatomy.

This proposal, if passed, will be a mockery of sound game management and common sense. This proposal suggest that salvaging the meat on a 1.5 pound duck is the same as a 400lb caribou or a 1200lb moose. This proposal would require waterfowl hunters to salvage rib meat, wrist meat, leg meat etc. from an animal that often weighs less then one pound when field dressed. Anyone knows that waterfowl meat is the breast meat. On larger goose species the legs are big enough to salvage, but this meat is very tough and contains a lot of connective tissues etc making it less palatable. Waterfowl hunters need to make use and prevent waste as much as possible!! Most hunters do this already and are very passionate about their hunting and utilizing the game they harvest. But where do we draw the line? Are we supposed to eat all of the organs too, or should we just pluck the bird and throw it in the grinder and enjoy a duck smoothy? Where does it end? This proposal is a direct attack on the great waterfowl tradition that many enjoy and rely on for food and sport across Alaska. Their are already rules that make not salvaging the breast meat a crime in Alaska and that works for vast majority of us. We do not need the government telling how to eat our waterfowl and we need to enforce the current regulations.

#### Comments on Proposal 153

This proposal will only cause undue waste and hardship to enforcement and hunters while not providing any gain for the resource or those who utilize it. This rule is a direct attack on waterfowlers and the tradition of waterfowl hunting by an anti hunting group. The amount of meat from legs of commonly shot ducks in Alaska weigh less then 1 ounce and are comprised of many ligaments and tendons making these tiny muscles unfit for consumption. Responsible hunters follow regulations and take wanton waste very seriously.

This proposal has one goal only, to further erode the tradition of waterfowl hunting in Alaska.

#### Comments on Proposal 154



This proposal is a direct attack by anti hunters on the waterfowl guiding industry in Alaska and on taxidermist that mount waterfowl. Hunters either ship frozen whole birds or frozen skins to their taxidermist so they can get a mounted bird to honor the birds and share with friends and family. Hunters that are capable of skinning delicate birds do so and utilize the meat like any other waterfowl they shoot. Not all hunters are capable of skinning waterfowl with the skill and neatness necessary for taxidermist, so they ship the whole bird. This allows the professional and US Fish and Wildlife Service licensed individual to skin the bird and measure the carcass for the most accurate mount. He then can also salvage the meat and gift it etc. Many waterfowl in Alaska are very beautiful and when a hunter chooses to have a bird reserved in mount he is utilizing that bird far more then the average duck that is only eaten. The current regulations work and contrary to the small minority that propose all these excessive regulations, waterfowlers do their best to salvage as much meat as possible and are genuinely concerned with the welfare of our ducks and geese. Duck and goose hunters have created Ducks Unlimited, Delta Waterfowl, etc that work to preserve and enhance our waterfowl populations and the environments they need to prosper. Waterfowl hunters are a passionate group as a whole and many like to get a few ducks and geese mounted. These mounts are a reminder to hunters of great hunts with friends and family and also a reminder of the beauty of waterfowl and how important the conservation of the species is.

Comment for Proposal 155.

I believe no action is necessary since the existing laws are simple for hunters to follow. Responsible hunters know that different regulations apply to different species. Upland birds are managed by the state of Alaska, while migratory birds are managed by the US Fish and Wildlife Service. This has been the case for over 50 years, and hunters are not confused. This proposal would cause undue strain on those that like to eat birds throughout the season. Many areas of Alaska have a very long hunting season for birds, but in reality a very short time period where they can actually hunt. Some areas have less then a month to hunt ducks, even though the season is 107 days long since the birds leave early in the northern cold climate. Many hunters have just 2-3 weekends to hunt and try to stock pile birds in those few hunts to last the whole year. Further restricting possession limits would cause unnecessary limits and hardship on those that like to eat their fowl throughout the year. This goes completely against Alaskans wanting to hunt their own food and provide for their families.



Submitted By  
Jim Crews  
Submitted On  
2/27/2014 11:06:48 AM  
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Proposals 151-155 are onerous, burdensome, confusing and appear to be intended to discourage hunting. The proposed possession limit changes in proposal 155 would almost eradicate the ability of out-of-state waterfowl hunters to visit Alaska for hunting. For example, I hunted last autumn and was able to take home a full possession limit of black brant, all of which were consumed over the course of several meals. 155 would eliminate this opportunity and also certainly eliminate the likelihood of a return visit, which otherwise are 100%

I respectfully request that proposals 151-155 be denied. Thank you for your consideration.

Jim Crews



Submitted By  
John J. Wojcik III  
Submitted On  
2/28/2014 6:36:33 AM  
Affiliation

Hello,

I heard about the proposed waterfowl hunting rule changes online and am very disappointed to say the least. There are people in this world that do not like the legal harvest of game. And will do anything in their power to abolish hunting. This is their legal means to work against sportsman. Proposals.

So I ask you, our waterfowl hunting trustee. To please cast a favorable vote for the hunters. Take a judistic look at all proposals of course. But remember, with any proposal ask yourself what is the long term goal of it? And the people who wrote it... What is their agenda.

In closing, thanks for your time. Can't wait for the day when I come to your great state for some quality waterfowl hunting.

Sincerely, John Wojcik



Submitted By  
Bakker  
Submitted On  
2/28/2014 11:57:11 AM  
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Auke Bay, Alaska 99821

**Proposal 172:** Remove black bears from the furbearer classification.

I **SUPPORT** proposal 172

I have been an Alaskan resident for 33 years and have seen wildlife management under the current Board of Game deteriorate to its lowest level.

It is time the Board of Game enter the 21st century and realizes that snaring bears is cruel, not biologically sustainable, indiscriminate and is incompatible with the scientific principles and ethics of modern wildlife management.

Bears have cultural, economic (tourism) and biological importance

Snaring bears creates dangers for other consumptive users: hikers could come upon a situation where a bear is caught in a snare, has sibling(s) around or the mother.

Baited snares could create food conditioned bears - an unacceptable danger to the public.

The Board of Game tarnishes Alaska's image for residents and non-residents alike by insisting on continuing its cruel and unnecessary war on predators.

**The bear snaring experiment started in 2010 and it is time to end the experiment.**



Submitted By  
Kaleen Vaden  
Submitted On  
2/27/2014 6:44:48 AM  
Affiliation  
private citizen, photographer

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**I strongly support Proposal 172, to end black bear snaring.**

I am a frequent visitor to Alaska (at least 15 trips), mostly to photograph and enjoy the black and brown bears, moose, wolves and other wildlife (I've even seen a lynx!), and treasure the wildlife in the state. Bear snaring is extremely cruel and unnecessary, and also can condemn cubs to die a slow death if their mother is caught. The wildlife is one of the main reasons tourists and photographers come to Alaska and is a valuable resource to the state. Why destroy it??? And in such a cruel and barbaric way??? I totally agree with the following points and support them:

Scientists overwhelmingly agree that bear snaring is indiscriminate, cruel and not biologically sustainable.

\* Because bear snaring is indiscriminate, females with dependent cubs and cubs themselves are at risk. Grizzly bears and other non-target species are caught and killed in snares. Bears have one of the lowest reproductive rates and it is for this reason modern scientific management principles discourage killing females.

\* Snaring is egregiously wasteful. There is no requirement that meat from bears killed in snares be salvaged for human food. They are being killed for the simple purpose of decimating yet another predator species.

\* Snaring is an extremely controversial method of killing wildlife, regardless of the species targeted. The BOG tarnishes Alaska's image for residents and non-residents alike by insisting on continuing its cruel and unnecessary war on predators. Bear snaring has never been allowed in Alaska since statehood - until the BOG approved and implemented an experimental snaring program in 2010.

\* No other state - among the few still fortunate enough to have bear populations - classifies the animals as furbearers.

\* Snaring creates dangers for other consumptive users, hikers and their pets 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 extremely dangerous.

\* Snares are allowed as close as ¼ mile beside maintained trails and roads used by the public. A bear investigating a baited snare could cover ¼ mile and attack an unsuspecting hiker in as little as 30 seconds - an unwarranted and unacceptable danger to the public.

\* 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.

**Please vote to pass this proposal 172 and end black bear snaring!**

**Thank you,**

**Kaleen Vaden, Mechanicsville, MD**



Submitted By  
Karen Walker  
Submitted On  
2/26/2014 4:00:28 PM  
Affiliation

Phone  
907-278-0628  
Email  
[travelingkaren@hotmail.com](mailto:travelingkaren@hotmail.com)  
Address  
1640 Eastridge Drive #301  
Anchorage, Alaska 99501

Board of Game,

I urge you to support Proposal 172 to stop black bear snaring. Prior to 2010, bear snaring was not allowed for 50 years. Black bears should not be considered a "furbearer" in Alaska and no other state classifies the animals as furbearers. Baiting an animal to a snare does not seem to be a fair way to take an animal. It can also attract other non-target animals and pets that wander too close to the snare. Snaring is indiscriminate and could catch females with cubs.

I have been a nature tour guide in Alaska for 28 years and one of the main species of animals that my guests want to see is a bear. The snaring of black bears will cause a drop in the bear population and make it even harder for my guests to view these magnificent animals. Snaring bears will only help a few people financially, while protecting the bears will bring great joy and admiration to many Alaskans and visitors alike. Travelers come from all over the world to see the wildlife and wilderness of Alaska. They spend a lot of money here which supports many different Alaskans and industries. You can be a part of helping many people to realize their dreams.

Thank you for your consideration.

Karen Walker



Submitted By  
Kelly DuFort  
Submitted On  
2/27/2014 4:19:05 PM  
Affiliation  
AK resident since 2001

I urge the board to **strongly support Proposal 172**. Snaring is a wasteful, indiscriminate way to kill bears and is a danger to hikers and other animals. Bears have a very low reproductive rate and scientific management principles discourage killing females. Before 2010, bear snaring had not been allowed since Alaska became a state. Bears have cultural, economic and biological importance to our state and are listed as one of the main wildlife species that visitors come to Alaska to see. Please support the proposal to declassify bears as furbearers.

Respectfully,

Alaska resident since 2001



Submitted By  
Kelly Willett  
Submitted On  
2/27/2014 9:57:00 AM  
Affiliation

Proposal 174

I am writing in support of Prop 174, for the take of falcons and hawks by non-residents. I also support the take of eyas birds in addition to passage taken birds. There are very few resident falconers in the state compared to that of the lower 48, most other states that I know of allow non-resident take within a biologically responsible level. This take, I believe, will not harm the residents and their falconry take.

Falconers are a law-abiding group that will go to great lengths to follow the rules as we all value our sport as a way of life of historical importance.



Submitted By  
Kim Avrutik  
Submitted On  
2/26/2014 1:17:06 PM  
Affiliation

Phone  
847 681 8386

Email  
[Animalspeak@me.com](mailto:Animalspeak@me.com)

Address  
639 East Meadowbrook Avenue  
Orange, California 92865

Please do not permit bear snaring.

Kim Avrutik

# Native Village of Kotzebue Kotzebue IRA



PC48 1 of 3

February 21, 2014

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

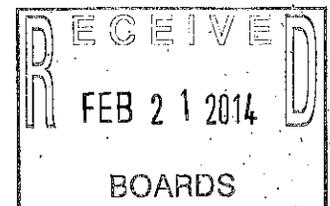
*Knowledge of Language**Knowledge of Family Tree**Sharing**Humility**Respect for Others**Love for Children**Cooperation**Hard Work**Respect for Elders**Respect for Nature**Avoid Conflict**Family Roles**Humor**Spirituality**Domestic Skills**Hunter Success**Responsibility to Tribe*

**RE: Proposal 177 – 5 AAC 92.080(4) & (5). Unlawful methods of taking game; exceptions, and 92.990 (70) Definitions.**

Dear Alaska Board of Game:

The Native Village of Kotzebue Council passed **Resolution 14-24** (see attached) supporting the State of Alaska Board of Game proposal to allow for the use of snow-machines to track and pursue caribou, wolves, and wolverines so that the prohibition against driving, herding, harassing, or molesting game with a snow machine will not apply in unit 23, or other similar game units as determined by the board, while hunting these species.

This change is important to our tribal citizens, who are life-long Alaskans, and the surrounding villages. In our rural and Arctic area, which is frozen ice and snow covered for 8 months of the year, people commonly use snowmachines for hunting to provide food and fur from local resources, including caribou, wolves, and wolverines. The high cost of purchasing and shipping snowmachines to Kotzebue and the cost of gas and oil, are extremely high in relation to the rest of the State and the Nation, while local job opportunities and availability of alternative resources is very low. Due to this, it is critical that people are allowed to maximize any trips taken to look for subsistence food and fur by being able to catch any animals that they come across, which will sometimes mean having to chase them down, especially in very large flat areas of tundra and ice, where it is almost impossible to approach animals without them running away long before coming into shooting range. Hunting is not a sport for people living in our community and region -- it is a proud way of Inupiaq life, and the current rule prohibiting driving, herding, harassing, or molesting game with a snowmachine, in essence criminalizes part of that way of life.





In addition, the wolf population in the region has increased, while the caribou and moose populations have been decreasing, it is important to encourage people to hunt wolves in order to help reduce predation on the already decreasing herds of food animals. The enforcement incident over wolverine hunting near Kivalina, where a person was penalized for pursuing a wolverine with a snowmachine, has dampened the effort being put forward by local hunters and the only way to reverse this is to pass Board Proposal 177. Without this action by the Board it is more likely that wolves will continue to increase while caribou and moose continue to decrease, increasing user conflict issues, making future reduced bag limits on caribou and moose more likely, while increasing food insecurity and negatively impacting the local economy. This will also probably lead to calls for the State to initiate an intensive predator program in the region, which will be expensive for the State and be less politically acceptable response than letting local people undertake the effort through normal subsistence hunting opportunities.

The hunters that are citizens of the Tribe are more than happy to follow regulations, but these rules must be responsive to local conditions and customs, the current prohibition against using a snowmachine to pursue caribou, wolves, and wolverines is neither, and needs to be corrected so people can freely, without fear of prosecution, pursue their hunting activities and provide much needed food and fur for their families.

The Native Village of Kotzebue very much supports the Proposal 177 and encourages the Board to vote to change the current rules.

Thank you for your consideration of our comments, the Council Resolution and the needs of our hunting community.

Sincerely,

A handwritten signature in black ink, appearing to read "Ukallaysaq Tom Okleasik".

Ukallaysaq Tom Okleasik  
Executive Director

# Native Village of Kotzebue Kotzebue IRA



PC48 3 of 3

## RESOLUTION 14-24

### A RESOLUTION IN SUPPORT OF THE ALASKA BOARD OF GAME PROPOSAL TO CHANGE THE GENERAL HUNTING RESTRICTION TO ALLOW THE USE OF SNOW MACHINES TO TRACK AND PURSUE CARIBOU, WOLVES, AND WOLVERINES

*Knowledge of Language**Knowledge of Family Tree**Sharing**Humility**Respect for Others**Love for Children**Cooperation**Hard Work**Respect for Elders**Respect for Nature**Avoid Conflict**Family Roles**Humor**Spirituality**Domestic Skills**Hunter Success**Responsibility to Tribe*

**WHEREAS**, The Native Village of Kotzebue is a federally-recognized tribe and is the governing body of the Tribal citizens of Qikiqtagruk or Kotzebue, Alaska; and

**WHEREAS**, the Native Village of Kotzebue (Tribe) ascribes to self-determination so as to render all services to be more responsive to the needs and desires of the Tribe; and

**WHEREAS**, the Tribe advocates for regulations that are responsive to the needs of its citizens by recognizing and accommodating locally practiced and accepted hunting methods into statute; and

**WHEREAS**, the use of snow-machines for pursuing and hunting wolves, wolverines, and caribou has been successfully adapted by tribal citizens since snow-machines first arrived in the region; and

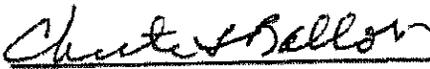
**WHEREAS**, the non-enforcement of these external prohibitions relating to this issue is no longer in effect; and

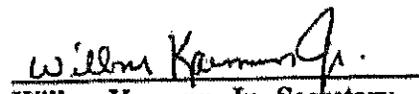
**WHEREAS**, Tribal citizens need to be allowed to legally use snow-machines to hunt wolves, wolverines, and caribou for subsistence including providing food and income for their families, while at the same time keeping wolf and predator populations in check in order to help protect the moose, caribou, and sheep populations in the region.

**NOW THEREFORE BE IT RESOLVED**, The Native Village of Kotzebue Tribal Council supports the State of Alaska Board of Game proposal to allow for the use of snow-machines to track and pursue caribou, wolves, and wolverines so that the prohibition against driving, herding, harassing, or molesting game with a snow machine will not apply in unit 23, or other similar game units as determined by the board, while hunting these species.

### CERTIFICATION

A vote of 7 for and 0 against and 1 not voting adopt this resolution 14-24 at a regular meeting of the Native Village of Kotzebue, Kotzebue Council held this 18<sup>th</sup> day of February, 2014.

  
Chester L. Ballot, Chairman

  
Wilbur Karmun, Jr., Secretary



Submitted By  
Larry Casey  
Submitted On  
2/26/2014 10:17:26 AM  
Affiliation

Phone  
9076942286

Email  
[icsteelhead@gmail.com](mailto:icsteelhead@gmail.com)

Address  
12428 Winter Park Circle  
Eagle River, Alaska 99577

In reference to proposal 172 I strongly urge rejection of black bear snaring.

This is in no way is fair chase. Hunting season on black bears in most areas is more than adequate.

I would also like to read the "science" behind these type of proposals. Did not Moose thrive up here with brown and black bears before modern management?

In any event I would like to send this proposal to the trash can where it belongs.

Thank you for your time.



Submitted By  
Laura A. Kiesel  
Submitted On  
2/28/2014 12:00:58 PM  
Affiliation

Dear BOG,

As an academically trained wildlife biologist and a natural resource scientist, as well as as a former resident of AK with strong ties with the state, I am writing to voice my strong support for Prop 172 to remove black bears from the classification as a "furbearer" species in the state's wildlife management regulations in order to enable snaring and baiting practices.

No other state in the U.S. classifies bears as furbearers. Bear snaring is an inhumane and ecologically unsustainable way to manage bear populations, while also harming other non-target species and threatening the safety of human passerby and their pets. This extremely controversial method of killing wildlife ruins Alaska's reputation and threatens its tourism industry, which is highly dependent on non-consumptive wildlife activities such as viewing and photography.

I urge you to please support Prop 172 and end this cruel and unnecessary practice. Thank you for your consideration.

Sincerely,

Laura Kiesel



Submitted By  
Lee Stiff  
Submitted On  
2/26/2014 10:45:06 AM  
Affiliation  
  
Phone  
8054521254  
Email  
[leeann.stiff@gmail.com](mailto:leeann.stiff@gmail.com)  
Address  
306 W Summer St  
Ojai, California 93023

## Proposal 172: Vote "Yes" to Stop Black Bear Snaring

Reasons to support:

- \* Scientists overwhelmingly agree that bear snaring is indiscriminate, cruel and not biologically sustainable.
- \* Because bear snaring is indiscriminate, females with dependent cubs and cubs themselves are at risk. Grizzly bears and other non-target species are caught and killed in snares. Bears have one of the lowest reproductive rates and it is for this reason modern scientific management principles discourage killing females.
- \* Snaring is egregiously wasteful. There is no requirement that meat from bears killed in snares be salvaged for human food. They are being killed for the simple purpose of decimating yet another predator species.
- \* Snaring is an extremely controversial method of killing wildlife, regardless of the species targeted. The BOG tarnishes Alaska's image for residents and non-residents alike by insisting on continuing its cruel and unnecessary war on predators. Bear snaring has never been allowed in Alaska since statehood - until the BOG approved and implemented an experimental snaring program in 2010.
- \* No other state - among the few still fortunate enough to have bear populations - classifies the animals as furbearers.
- \* Snaring creates dangers for other consumptive users, hikers and their pets 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 extremely dangerous.
- \* Snares are allowed as close as ¼ mile beside maintained trails and roads used by the public. A bear investigating a baited snare could cover ¼ mile and attack an unsuspecting hiker in as little as 30 seconds - an unwarranted and unacceptable danger to the public.
- \* 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.



Submitted By  
Linda Shaw  
Submitted On  
2/26/2014 10:46:54 AM  
Affiliation

Phone  
907-790-2281

Email  
[lindarshaw@yahoo.com](mailto:lindarshaw@yahoo.com)

Address  
9684 Moraine Way  
Juneau, Alaska 99801

I wish to **strongly support Proposal 172**, submitted by the Alaska Wildlife Alliance to remove black bears from the "furbearer" classification, which allows them to be snared. This practice is indiscriminate, wasteful, unsustainable, cruel and embarrassing to the State of Alaska. No other State in the country classifies bears as furbearers. In addition, snared bears pose a threat to the safety of the general public and tourism. Bear snaring needs to be stopped immediately in the State of Alaska.



Submitted By  
Lorraine Murray  
Submitted On  
2/28/2014 10:12:24 AM  
Affiliation  
self

Phone  
907-790-3951  
Email  
[lrm@alaska.net](mailto:lrm@alaska.net)  
Address  
PO Box 210192  
Auke Bay, Alaska 99821

~~~~February 28, 2014  
Re: In support of Proposal 172  
Dear Board of Game:

As a lifelong Alaskan, I intensely oppose snaring in general and specifically the snaring of bears. Snaring is reckless; it puts people, pets, and other wildlife at risk. Snaring indiscriminately takes wildlife and there is no accountability with the practice of using snares. Snaring bears is also wasteful because these animals are not trapped to put food on the table. Our wildlife should always be treated with dignity and respect regardless if they are being hunted or viewed for pleasure and the snaring of bears is inhumane and cruel.

I firmly support Proposal 172, which would remove black bears from the classification of "furbearer" and end the practice of allowing trappers to use snares to capture and kill these animals.

Sincerely,  
Lorraine Murray  
PO Box 210192  
Auke Bay, AK 99821



Submitted By  
Marcia Denison  
Submitted On  
2/27/2014 2:45:51 PM  
Affiliation  
Alaska Wildlife Alliance

Dear Game Board,

I am in favor of Proposal 172. Bear snaring is cowardly, cruel and contrary to the ethic of fair chase. It is indiscriminate, snaring non-target bears and other wildlife, and a danger to humans and pets. I enjoy seeing bears and all wildlife in the wild and don't want them to become targets of local extinctions. Sound wildlife management would ban bear snaring. Please adopt Proposal 172, for public safety and people who enjoy Alaskan wildlife.

Thank you for adding this option to your website, very cool!

Marcia K. Denison



Submitted By  
Margaret McGinnis  
Submitted On  
2/27/2014 5:22:13 PM  
Affiliation

Phone  
781-925-1834  
Email  
[margaretmcginnis@verizon.net](mailto:margaretmcginnis@verizon.net)  
Address  
7 Rockview Rd  
Hull, Massachusetts 02045

I support Proposal 172 (page 246), submitted by AWA and authored by former AWA Board member and current Advisory Board member Valerie Connor, which would remove black bears from the classification of "furbearer" species in the state's wildlife management regulations.

\* Scientists overwhelmingly agree that bear snaring is indiscriminate, cruel and not biologically sustainable.

\* Because bear snaring is indiscriminate, females with dependent cubs and cubs themselves are at risk. Grizzly bears and other non-target species are caught and killed in snares. Bears have one of the lowest reproductive rates and it is for this reason modern scientific management principles discourage killing females.

\* Snaring is egregiously wasteful. There is no requirement that meat from bears killed in snares be salvaged for human food. They are being killed for the simple purpose of decimating yet another predator species.

\* Snaring is an extremely controversial method of killing wildlife, regardless of the species targeted. The BOG tarnishes Alaska's image for residents and non-residents alike by insisting on continuing its cruel and unnecessary war on predators. Bear snaring has never been allowed in Alaska since statehood - until the BOG approved and implemented an experimental snaring program in 2010.

\* No other state - among the few still fortunate enough to have bear populations - classifies the animals as furbearers.

\* Snaring creates dangers for other consumptive users, hikers and their pets 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 extremely dangerous.

\* Snares are allowed as close as ¼ mile beside maintained trails and roads used by the public. A bear investigating a baited snare could cover ¼ mile and attack an unsuspecting hiker in as little as 30 seconds - an unwarranted and unacceptable danger to the public.

\* 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.



Submitted By  
Mark Miller  
Submitted On  
2/26/2014 2:44:26 PM  
Affiliation

Phone  
907-790-3018  
Email  
[markjpmiller@gmail.com](mailto:markjpmiller@gmail.com)

Address  
9404 Long Run Drive  
Juneau, Alaska 99801-8806

Dear Board members:

I am writing to oppose the snaring of black bears. I believe this is a dangerous means of harvesting black bears since several bears may be attracted, leaving a free bear to be aggressive toward anyone approaching. Baiting bears also teaches bears to associate food with people, a dangerous situation.

I also oppose black bears being harvested without the meat being used as a human food source.

When it is deemed necessary to harvest black bears, please do not use snaring.

Thank you for your consideration.....Mark Miller



Submitted By  
Megan  
Submitted On  
2/27/2014 12:12:39 PM  
Affiliation

I OPPOSE proposal 172 !!!!! Bear snaring is ridiculous, wasteful, and cruel. It poses a danger to hikers, pets who may come upon a snared bear. It is indiscriminate killing as will snare anything- including a mother bear and cubs. Let NATURE handle itself- and go get another hobby!



Submitted By  
Michael Raffaeli  
Submitted On  
1/30/2014 10:41:10 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



Submitted By  
Mike Munsey  
Submitted On  
1/24/2014 11:28:49 AM  
Affiliation  
  
Phone  
9078472203  
Email  
[mmunsey@starband.net](mailto:mmunsey@starband.net)  
Address  
Amook Pass  
Kodiak, Alaska 99615

I would like to submit the following comments in opposition to Proposal 146, especially the special provisions for brown bear drawing permit hunts. I am a Master Guide here on Kodiak and have been guiding for 35 years. I was born into this business and have seen many different permit allotment systems come and go. The system we have now works, and it works because of the Guide/Client Agreement that is required in order to apply for a permit. Without it, the system would be in chaos. If a prospective hunter could apply for a permit simply by purchasing a hunting license and paying the \$5.00 application fee, he could say to the guide who has the rights to the area (granted by the USFWS), "okay, I have the permit. You can't operate without me, and I can't hunt without you, so what kind of deal can we make?". Or, for those guides who operate on state land, he could pit one guide against another, trying to get the best deal. The guiding industry here on Kodiak would falter. High quality, well guided hunts are a mainstay of the industry here on Kodiak, and it would be impossible to maintain that quality if we had to "bargain" with hunters. My other concern would be anti-hunters applying for the permits so no one hunts. Its a good system here on Kodiak; if it ain't broke, don't fix it. Thank you for your consideration.



Submitted By  
Nan Eagleson  
Submitted On  
1/31/2014 1:45:12 PM  
Affiliation

Phone  
907-683-2822

Email  
[surfbird@mtaonline.net](mailto:surfbird@mtaonline.net)

Address  
PO Box 114  
Denali Park, Alaska 99755

Proposal 164, Intensive Management "Support"

It should be required that the department provides a yearly predator management/predator control report. Many Alaskans are opposed to Intensive Management and feel, at the very least, it should be reported how many animals (predators) are taken out of the ecosystem in order to turn Alaska into a giant moose farm.

Thank you for the opportunity to comment on line.



Submitted By  
Nan Eagleson  
Submitted On  
1/31/2014 1:55:45 PM  
Affiliation

Phone  
907-683-2822

Email  
[surfbird@mtaonline.net](mailto:surfbird@mtaonline.net)

Address  
PO Box 114  
Denali Park, Alaska 99755

Proposal 172 Definitions. Support

I support removing black bears from the furbearer classification. Baiting, trapping, and snaring is an inappropriate way to harvest black bears.

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)

**FEB 28 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 March 14-18, 2014, meeting in Anchorage 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 159: Recommendation: Oppose

(Brown bear; GMU 1-26) This proposal would repeal the meat (but not the hide or skull) salvage requirement for brown bears taken over bait. Currently this would affect GMU 12, 20 and 21 given the existing authorization in those GMUs. Even though the NPS is on record against the practice of taking brown bears over bait, we support maintaining the meat salvage requirement so that more of the harvested animal is utilized. Currently, this would affect Wrangell-St. Elias and Yukon-Charley Rivers National Preserves, but could affect additional NPS-managed preserves if the Board adds additional authorizations to hunt brown bears over bait.

Proposal 170 & 171: Recommendation: Oppose

(Dall Sheep; GMU 1-26) These proposals would modify the definition of "full curl" in different ways by adding additional criteria for horns that meets the full curl standard. Proposal 171



would also allow the take of "any ram...until the ADF&G has a specific repeatable method ...to determine if a set of sheep horns is legal or sublegal." This change would allow the take of any ram, regardless of size or age, when the regulations specify a full curl ram. We are concerned that this change would lead to significant overharvest of rams in many areas. In our view, this change would cause unacceptable and long-lasting impacts to sheep populations in many areas of the state including several NPS preserves where sheep populations are found. Regarding Proposal 170, we do not see that this additional definition would improve on the existing definition.

Proposal 172: Recommendation: Support

(Black bear: GMU 1-26) This proposal would remove black bears from the defined list of furbearers. This would eliminate the possibility of black bears being taken with a trapping license. The NPS has written to the Board about this in the past, suggesting this exact idea. We remain against the trapping of black bears and support this proposal.

Proposal #177: Recommendation: Oppose

(GMU 23: Caribou, wolf and wolverine) This proposal seeks to "Modify the restriction for using snow machines for taking wolves and wolverine," and to "Change the general hunting restriction to allow the use of snow machines to track and pursue caribou, wolves and wolverines so that the prohibition against driving, herding, harassing or molesting game with a snow machine will not apply in Unit 23, or other units as determined by the board, while hunting these species".

If supported as written these new regulatory allowances would be available to not only local hunters, but to all Alaska residents and non-residents. It is unclear to us if this is the proponent's intention. It is also unclear to us whether the BOG would use its discretion to adopt regulations that recognize the needs, customs and traditions of Alaska residents (State v. Morry, 836 P.2d 385 (Alaska 1992)).

We have concerns regarding the premise of and potential effects from the proposed uses of snow machines to track and pursue wildlife for harvest. The use of snow machines to take, drive, herd, harass, or molest game has been shown to: increase physiological stress in associated packs or herds; alter natural movement and feeding patterns; affect the quality of edible meat; and increase energy expenditures and stress during winter. Further, it is known that the Western Arctic Caribou Herd population is diminishing and it is reasonable to be cautious about allowing practices, by all potential hunters that could contribute to this decline, especially during winter when these practices would occur.

The proposed practices are contrary to existing Federal Subsistence Board regulations (50 CFR 100.26 (b) (5)) for federally authorized hunting on federal lands and contrary to NPS regulations (36 CFR 13.460 (d) (3)). We understand that this proposal was generated in GMU 23 where hunters are challenged by vast open country and a challenging environment. The NPS supports subsistence and sport hunting opportunity within specified units of the National Park System in Alaska in a manner consistent with our conservation mandates.

Previously (February 18, 2005), the NPS communicated its concerns to the Board on proposals (#102 & 106) which sought to allow the take of wolves with snow machines. At that time, the



Board chose not to allow such take. Should the Board pass this proposed regulation, we ask that NPS lands be excluded consistent with 5AAC 92.080 (4) (B) (iii).

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  
Susan Boudreau, Superintendent, Glacier Bay  
Diane Chung, Superintendent, Katmai  
Margaret Goodro, Superintendent, Lake Clark  
Frank Hays, Superintendent, Western Arctic Parklands  
Rick Obernesser, Superintendent, Wrangell-St. Elias  
Sandy Rabinowitch, Subsistence Manager, NPS-Alaska Region  
Chris Pergiel, Chief Law Enforcement Officer, NPS-Alaska Region



**Native Village of Point Hope  
P.O. Box 109  
Point Hope, Alaska 99766  
(907) 368-2330  
Fax: (907) 368-2332**

### **RESOLUTION 14-03**

**A RESOLUTION IN SUPPORT OF THE ALASKA BOARD OF GAME PROPOSAL TO CHANGE THE GENERAL HUNTING RESTRICTION TO ALLOW THE USE OF SNOW MACHINES AND ALL TERRAIN VEHICLES TO TRACK AND PURSUE CARIBOU, WOLVES, AND WOLVERINES SO THAT THE PROHIBITION AGAINST DRIVING, HERDING, HARASSING, OR MOLESTING GAME WITH A SNOW MACHINE WILL NOT APPLY IN UNIT 23, OR OTHER UNITS AS DETERMINED BY THE BOARD, WHILE HUNTING THESE SPECIES**

**WHEREAS**, the Native Village of Point Hope is an Alaskan Village chartered under the Indian Reorganizational Act of June 18, 1934 as amended and the Act of May 1, 1936; and

**WHEREAS**, the Native Village of Point Hope Council is the governing body of Point Hope, and it organized pursuant to a Constitution and By Laws approved May 15, 1939 by the U.S. Secretary of Interior; and

**WHEREAS**, the Native Village of Point Hope is fully authorized to act on behalf of our members in matters arising under the Indian Self Determination Act of 1975, P.L. 93-638, as amended, U.S.C. 450 et seq (hereby the "Act"); and

**WHEREAS**, the Governing Body of the Native Village of Point Hope is a seven member council empowered to act for and on behalf of its Tribal Members in adopting resolutions; and

**WHEREAS**; the Native Village of Point Hope advocates for regulations that are responsive to the needs of its membership by recognizing and accommodating locally practiced and accepted hunting methods into statute;

**WHEREAS**; the use of snowmachines and all terrain vehicles for pursuing and hunting wolves, wolverines, and caribou has been carried out by Native Village of Point Hope members since snowmachines and all terrain vehicles first arrived in the region; and

**WHEREAS**; the past practice of non-enforcement of the prohibitions relating to this issue is no longer in effect; and

**WHEREAS**; the Native Village of Point Hope members need to be allowed to legally use snowmachines and all terrain vehicles to hunt wolves, wolverines, and caribou to provide food and income for their families,



while at the same time keeping wolf populations in check in order to help protect the moose, caribou, and sheep populations in the region.

**NOW THEREFORE BE IT RESOLVED:** the Native Village of Point Hope Council supports the Board of Game proposal to allow for the use of snowmachines and all terrain vehicles to track and pursue caribou, wolves, and wolverines so that the prohibition against driving, herding, harassing, or molesting game with a snow machine will not apply in unit 23, or other units as determined by the board, while hunting these species.

#### CERTIFICATION

It is hereby certified that on the 27<sup>th</sup> day February 2014 a quorum of the Native Village of Point Hope Council was formed and the above resolution numbered 2014-03 was duly adopted by a vote of 7 affirmative votes, 0 negative votes, and 0 not voting.

SEAL

ATTEST

  
Jack Schaefer, President

  
Franklin Sage, Secretary



**Native Village of Point Hope  
P.O. Box 109  
Point Hope, Alaska 99766  
(907) 368-2330  
Fax: (907) 368-2332**

February 27, 2014

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

**RE: Board of Game Proposal addressing unlawful methods of taking game**

We support the Board proposal that would change the general hunting restriction to allow the use of snow machines and all terrain vehicles to track and pursue caribou, wolves, and wolverines so that the prohibition against driving, herding, harassing, or molesting game with a snow machine will not apply in Unit 23, or other units as determined by the board, while hunting these species.

I support this proposal because sitting on a snowmachine or all terrain vehicle provides a stable platform to shoot from, ensuring a clean kill. This regulation change is responsive to the needs of our tribal membership by recognizing and accommodating locally practiced and accepted hunting methods into statute. The Native Village of Pt Hope tribal members need to be allowed to legally use snowmachines and all terrain vehicles to hunt wolves, caribou, and wolverines to provide food and income for their families while at the same time keeping wolf populations in check in order to help protect the moose, caribou and sheep populations in our region.

A handwritten signature in black ink, appearing to read "Theodore Frankson, Jr.".

Theodore Frankson, Jr.  
NVPH Wildlife & Parks Director



*Native Village of Selawik*

Selawik IRA Council  
PO Box 59  
Selawik, AK 99770  
907.484.2005 p / 907.484.2226 f

**RESOLUTION 14-04**

A RESOLUTION IN SUPPORT OF THE ALASKA BOARD OF GAME PROPOSAL TO CHANGE THE GENERAL HUNTING RESTRICTION TO ALLOW THE USE OF SNOW MACHINES TO TRACK AND PURSUE CARIBOU, WOLVES, AND WOLVERINES SO THAT THE PROHIBITION AGAINST DRIVING, HERDING, HARASSING, OR MOLESTING GAME WITH A SNOW MACHINE WILL NOT APPLY IN UNIT 23, OR OTHER UNITS AS DETERMINED BY THE BOARD, WHILE HUNTING THESE SPECIES

WHEREAS: the Native Village of Selawik is an Alaskan Native Village organized as an Indian Tribe pursuant to the provisions of the Federal Indian Reorganization Act of 1934, as amended in 1936; and

WHEREAS: the Selawik IRA Council is the governing body of the Native Village of Selawik; and

WHEREAS: the Selawik IRA ascribes to self-determination so as to render all services to be more responsive to the needs and desires of the Native Village of Selawik tribe; and

WHEREAS: the Selawik IRA advocates for regulations that are responsive to the needs of its membership by recognizing and accommodating locally practiced and accepted hunting methods into statute;

WHEREAS: the use of snow machines for pursuing and hunting wolves, wolverines, and caribou has been carried out by Selawik IRA members since snow machines first arrived in the region; and

WHEREAS: the past practice of non-enforcement of the prohibitions relating to this issue is no longer in effect; and

WHEREAS: the Selawik IRA members need to be allowed to legally use snow machines to hunt wolves, wolverines, and caribou to provide food and income for their families, while at the same time keeping wolf populations in check in order to help protect the moose, caribou, and sheep populations in the region.

NOW THEREFORE BE IT RESOLVED: the Native Village of Selawik Council supports the Board of Game proposal to allow for the use of snow machines to track and pursue caribou, wolves, and wolverines so that the prohibition against driving, herding, harassing, or molesting game with a snow machine will not apply in unit 23, or other units as determined by the board, while hunting these species.

**CERTIFICATION**

Resolution 14-24 is approved by poll vote of the Selawik IRA Council on the 18<sup>th</sup> day of

February, 2014 by a vote of 5 for, 0 against, and 2 not voting.

Vida Coaltrain 2/14/14  
Vida Coaltrain Date  
President

Selawik IRA Council

Tracy Sampson 2-14-14  
Tracy Sampson Date  
Secretary

Selawik IRA Council



*Native Village of Selawik*

Selawik IRA Council  
PO Box 59  
Selawik, AK 99770  
907.484.2005 p / 907.484.2226 f

February 14, 2014

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

From: Native Village of Selawik

**RE: Board of Game Proposal addressing unlawful methods of taking game**

On behalf of the Native Village of Selawik and its tribal members, I am writing this to support the Board proposal that would change the general hunting restriction to allow the use of snow machines to track and pursue caribou, wolves, and wolverines so that the prohibition against driving, herding, harassing, or molesting game with a snow machine will not apply in Unit 23, or other units as determined by the board, while hunting these species.

Selawik is one of the eleven villages located in Northwest Alaska, and it sits right in the middle of the Selawik National Wildlife Refuge. It is abundant with all sorts of wildlife that our people have hunted for quite some time, for survival. Most people HAVE to use their snow machines to hunt caribou, wolves, wolverines, lynx, bears; it is the most efficient way to gather in the open tundra here. We need to be allowed to legally use snow machines to hunt to provide food and income for our families, while at the same time keeping wolf populations in check in order to help protect moose and caribou populations in the region.

Selawik people are culturally strong and continue to teach subsistence values to their children as they were taught from their Elders. Respect for the land, and respect for the animals we gather, is and has always been taught by those Elders.



Thank you for your concern in protecting our wildlife habitat, if you have any questions regarding this letter, please feel free to call to the number listed above or email me at [tribeadmin@akuligag.org](mailto:tribeadmin@akuligag.org).

Respectfully,

*Tanya Ballot*

Tanya Ballot  
Tribal Administrator  
Native Village of Selawik



Native Village of Buckland  
P.O Box 67  
Buckland, Alaska 99727

**Resolution #14-08**

**A RESOLUTION OF THE NATIVE VILLAGE OF BUCKLAND IN SUPPORT TO CHANGE THE GENERAL HUNTING RESTRICTION TO ALLOW THE USE OF SNOW MACHINES TO TRACK AND PURSUE ANY KIND OF GAME, INCLUDING CARIBOU, WOLVES, WOLVERINES AND OTHER GAME SPECIES.**

**WHEREAS:** The Native Village of Buckland is a federally recognized tribe; and the Buckland IRA Council is the governing body of the Native Village of Buckland; and

**WHEREAS:** the Native Village of Buckland ascribes to self-determination so as to render all services to be more responsive to the needs and desires of the Tribe; and

**WHEREAS:** the Native Village of Buckland advocates for regulations that are responsive to the needs of its members by recognizing and accommodating locally practiced and accepted hunting methods into statute; and

**WHEREAS:** since time immemorial, we have learned to hunt successfully from our elders by whatever means available throughout time; and

**WHEREAS:** hunting with boats and planes have been allowed, hunting by snow machine is another type of motorized vehicle available for use; and

**WHEREAS:** the use of snow machines for pursuing and hunting wolves, wolverines, caribou and other game species has been successfully adapted by tribal members since show machines first arrived in our region; and

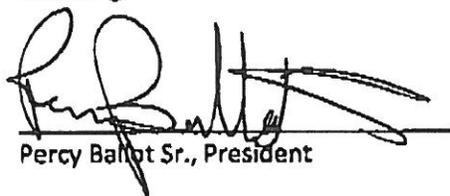
**WHEREAS:** tribal members need to be allowed to legally use snow machines to hunt wolves, wolverines, caribou and other game species for subsistence including providing food and income for their families, while at the same time keeping wolf and predator populations in check in order to help protect the moose, caribou, and sheep populations in the region.

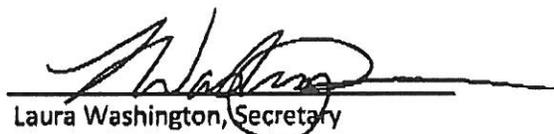


**NOW THEREFORE BE IT RESOLVED THAT** the Native Village of Buckland Tribal Council supports the State of Alaska Board of Game proposal to allow for the use of snow machines to track and pursue caribou, wolves, wolverines, and other game species so that the prohibition against driving, herding, harassing, or molesting game with a snow machine will not apply in unit 23, or other similar game units as determined by the board, while hunting these species.

**CERTIFICATION**

Passed and adopted by the Buckland IRA Council and the Buckland City Council this 18<sup>th</sup> day of February, 2014 with a vote of 4 for and 0 against this resolution at a regular monthly meeting.

  
Percy Ballot Sr., President

  
Laura Washington, Secretary



**Deering IRA Council**  
P.O. Box 36089  
Deering, AK 99736  
Phone (907) 363-2138 or 363-2214  
Fax: (907) 363-2195  
Serving the Native Village of Deering  
[tribeadmin@ipnatchiaq.org](mailto:tribeadmin@ipnatchiaq.org)  
**RESOLUTION 14-08**

**A RESOLUTION IN SUPPORT OF THE ALASKA BOARD OF GAME PROPOSAL TO  
CHANGE THE GENERAL HUNTING RESTRICTION TO ALLOW THE USE OF  
SNOW MACHINES TO TRACK AND PURSUE CARIBOU, WOLVES, AND  
WOLVERINES**

**WHEREAS**, The Native Village of Kotzebue is a federally-recognized tribe and is the governing body of the Tribal citizens of Qikiqtagruk or Kotzebue, Alaska; and

**WHEREAS**, the Native Village of Deering ascribes to self-determination so as to render all services to be more responsive to the needs and desires of the Tribe; and

**WHEREAS**, the Tribe advocates for regulations that are responsive to the needs of its citizens by recognizing and accommodating locally practiced and accepted hunting methods into statute; and

**WHEREAS**, the use of snow-machines for pursuing and hunting wolves, wolverines, and caribou has been successfully adapted by tribal citizens since snow-machines first arrived in the region; and

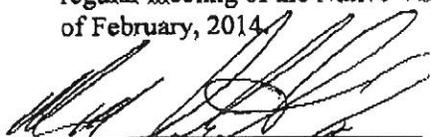
**WHEREAS**, the non-enforcement of these external prohibitions relating to this issue is no longer in effect; and

**WHEREAS**, Tribal citizens need to be allowed to legally use snow-machines to hunt wolves, wolverines, and caribou for subsistence including providing food and income for their families, while at the same time keeping wolf and predator populations in check in order to help protect the moose, caribou, and sheep populations in the region.

**NOW THEREFORE BE IT RESOLVED**, The Native Village of Deering Tribal Council supports the State of Alaska Board of Game proposal to allow for the use of snow-machines to track and pursue caribou, wolves, and wolverines so that the prohibition against driving, herding, harassing, or molesting game with a snow machine will not apply in unit 23, or other similar game units as determined by the board, while hunting these species.

**CERTIFICATION**

A vote of 11 for and 0 against and 0 not voting adopt this resolution 14-08 at a regular meeting of the Native Village of Deering, Deering Council held this 28<sup>th</sup> day of February, 2014.

  
Alvin Iyatunguk Sr.-President

  
Christopher Moto Secretary

Native Village of Kiana  
Kiana Traditional Council  
P.O. Box 69  
Kiana, Alaska 99749  
Phone: (907) 475-2109/ Fax: (907)475-2180



**Resolution 2014-02**

A resolution in support of the Alaska Board of Game Proposal to change the general hunting restriction to allow use of snow machines to track and pursue caribou, wolves, and wolverines so that the prohibition against driving, herding, harassing, or molesting game with a snow machine will not apply in Unit 23, or other Units as determined by the Board, while hunting these species.

**WHEREAS**, the Native Village of Kiana is an Alaska Native Village organized as an Indian Tribe pursuant to the provisions of the Federal Indian Reorganization act of 1934, as amended in 1936, and

**WHEREAS**, the Kiana Traditional Council is the governing body of the Native Village of Kiana and is empowered to act for and on behalf of its Tribal members in adopting resolutions, and

**WHEREAS**, the Kiana Traditional Council ascribes to self-determination so as to render all services to be more responsive to the needs and desires of the Native Village of Kiana Tribe, and

**WHEREAS**, the Kiana Traditional Council advocates for regulations that are responsive to the needs of its membership by recognizing and accommodating locally practiced and accepted hunting methods into statute, and

**WHEREAS**, the use of snow machines for pursuing and hunting wolves, wolverines, and caribou has been carried out by Native Village of Kiana members since snow machines first arrived in the region, and

**WHEREAS**, the past practice of non-enforcement of the prohibitions relating to this issue is no longer in effect, and

**WHEREAS**, the Native Village of Kiana members need to be allowed to legally use snow machines to hunt wolves, wolverines, and caribou to provide food and income for their families, while at the same time keeping wolf populations in check in order to help protect the moose, caribou, and sheep populations in the region;

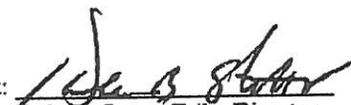
**NOW THEREFORE BE IT RESOLVED:** the Kiana Traditional Council supports the Board of Game proposal to allow for the use of snow machines to track and pursue caribou, wolves, and wolverines so that the prohibition against driving, herding, harassing, or molesting game with a snow machine will not apply in Unit 23, or other units as determined by the Board, while hunting these species.

**Certification**

The foregoing resolution was enacted by the Kiana Traditional Council for the Native Village of Kiana, which is comprised of 7 members, of which 6 were present, on this 20<sup>th</sup> day of February, 2014, by a vote of 6 for and 0 against and 0 abstaining.

  
Raven Jackson Sr., President

  
Ely Cyrus, Secretary

Attest:   
Dale B. Stotts, Tribe Director



## Native Village of Kivalina

P.O. Box 50051 Kivalina, AK 99750 Ph: (907)645-2201 or 645-2153 Fax: (907)645-2250 or 645-2193  
e-mail: [tribeadmin@kivaliniq.org](mailto:tribeadmin@kivaliniq.org)

"Advocating for our people, land, waters and subsistence way of life"

---

February 28, 2014

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

Gentlemen:

Per this letter, the Native Village of Kivalina supports the Board of Game's proposal to change the current hunting restrictions to allow for the use of snow machines to track and pursue caribou and other fur bearing mammals, so that the restriction against using a snow machine will not apply in Unit 23, or other units as determined by the Board.

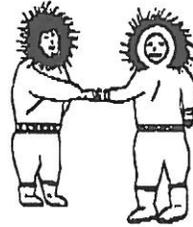
The Tribal members of the Native Village of Kivalina have customarily hunted these species even before the formation of the State of Alaska, customs which have been handed down through the generations. We use fur bearing animals for our winter clothing and caribou to feed ourselves and our families. The caribou meat offsets the high cost of living in the rural areas.

We hope that the proposal will be passed so we can continue our practices with no fear of interference by the State and we can pass on our customs to the next generation.

Thank you,

Millie Hawley, President  
Native Village of Kivalina

A handwritten signature in black ink, appearing to read "Millie Hawley".



NATIVE VILLAGE OF NOATAK  
P.O. BOX 89  
NOATAK, ALASKA 99761  
PHONE: (907) 485-2173  
FAX: (907) 485-2137

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

From;  
Native Village of Noatak  
Noatak Village Council

February, 24 2014

The Native Village of Noatak support the Board proposal that would change the general hunting restriction to allow the use of snow machines to track and pursue caribou, wolves, wolverines so that the prohibition against driving, herding, harassing, or molesting game with a snow machine will not apply in Unit 23, or other units as determined by the Board, while hunting these species.

The native Village has been hunting these species for a long time, even our fore Fathers have hunted with dog-teams the same way and have been passed on to us. We use wolves, wolverines for our fur parkas to keep warm during the cold winter months, we also use caribou to sustain our food of diet for ourselves during winter. Due to high food prices we mainly depend on caribou year around. We hope that the proposal will be passed so we can start hunting the way we were taught.

Taikuu

Noatak Village Council  
Native Village of Noatak

Native Village of Kiana  
Kiana Traditional Council  
P.O. Box 69  
Kiana, Alaska 99749  
Phone: (907) 475-2109/ Fax: (907)475-2180



**Resolution 2014-02**

A resolution in support of the Alaska Board of Game Proposal to change the general hunting restriction to allow use of snow machines to track and pursue caribou, wolves, and wolverines so that the prohibition against driving, herding, harassing, or molesting game with a snow machine will not apply in Unit 23, or other Units as determined by the Board, while hunting these species.

WHEREAS, the Native Village of Kiana is an Alaska Native Village organized as an Indian Tribe pursuant to the provisions of the Federal Indian Reorganization act of 1934, as amended in 1936, and

WHEREAS, the Kiana Traditional Council is the governing body of the Native Village of Kiana and is empowered to act for and on behalf of its Tribal members in adopting resolutions, and

WHEREAS, the Kiana Traditional Council ascribes to self-determination so as to render all services to be more responsive to the needs and desires of the Native Village of Kiana Tribe, and

WHEREAS, the Kiana Traditional Council advocates for regulations that are responsive to the needs of its membership by recognizing and accommodating locally practiced and accepted hunting methods into statute, and

WHEREAS, the use of snow machines for pursuing and hunting wolves, wolverines, and caribou has been carried out by Native Village of Kiana members since snow machines first arrived in the region, and

WHEREAS, the past practice of non-enforcement of the prohibitions relating to this issue is no longer in effect, and

WHEREAS, the Native Village of Kiana members need to be allowed to legally use snow machines to hunt wolves, wolverines, and caribou to provide food and income for their families, while at the same time keeping wolf populations in check in order to help protect the moose, caribou, and sheep populations in the region;

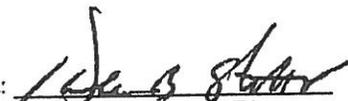
**NOW THEREFORE BE IT RESOLVED:** the Kiana Traditional Council supports the Board of Game proposal to allow for the use of snow machines to track and pursue caribou, wolves, and wolverines so that the prohibition against driving, herding, harassing, or molesting game with a snow machine will not apply in Unit 23, or other units as determined by the Board, while hunting these species.

**Certification**

The foregoing resolution was enacted by the Kiana Traditional Council for the Native Village of Kiana, which is comprised of 7 members, of which 6 were present, on this 20<sup>th</sup> day of February, 2014, by a vote of 6 for and 0 against and 0 abstaining.

  
Raven Jackson Sr., President

  
Ely Cyrus, Secretary

Attest:   
Dale B. Stotts, Tribe Director

**"To Strengthen our Culture by Empowering our Tribe"**



Submitted By  
Nikki Doyle  
Submitted On  
2/28/2014 11:38:49 AM  
Affiliation

Phone  
510-502-7547  
Email  
[nikkidoyle7@gmail.com](mailto:nikkidoyle7@gmail.com)  
Address  
4115 Waterhouse Road  
Oakland, California 94602

To Whom It Concerns--

Please vote YES to stop black bear snaring.

Thank you.

Nikki Doyle



Noorvik Native Community  
P.O. Box 209  
Noorvik, Alaska 99763  
Ph: (907) 636-2144  
Fax: (907) 636-2284

**Resolution 14-04**

**A RESOLUTION IN SUPPORT OF THE ALASKA BOARD OF GAME PROPOSAL TO CHANGE THE GENERAL HUNTING RESTRICTION TO ALLOW THE USE OF SNOW MACHINES TO TRACK AND PURSUE CARIBOU, WOLVES AND WOLVERINES SO THAT THE PROHIBITION AGAINST DRIVING, HERDING, HARASSING, OR MOLESTING GAME WITH A SNOW MACHINE WILL NOT APPLY IN UNIT 23, OR OTHER UNITS AS DETERMINED BY THE BOARD, WHILE HUNTING THESE SPECIES**

**WHEREAS:** the Noorvik Native Community is an Alaskan Native Village organized as an Indian Tribe pursuant to the provisions of the Federal Indian Reorganization Act of 1934, as amended in 1936; and

**WHEREAS:** the Noorvik IRA Council is the governing body of the Noorvik Native Community; and

**WHEREAS:** the Noorvik IRA ascribes to self-determination so as to render all services to be more responsive to the needs and desires of the Noorvik Native Community Tribe; and

**WHEREAS:** the Noorvik IRA advocates for regulations that are responsive to the needs of its membership by recognizing and accommodating locally practiced and accepted hunting methods into statute;

**WHEREAS:** the use of snow machines for pursuing and hunting wolves, wolverines, and caribou has been carried out by Noorvik IRA members since snow machines first arrived in the region; and

**WHEREAS:** the past practice of non-enforcement of the prohibitions relating to this issue is no longer in effect; and

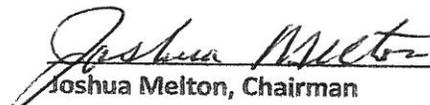
**WHEREAS:** the Noorvik IRA members need to be allowed to legally use snow machines to hunt wolves, wolverines, and caribou to provide food and income for their families, while at the same time keeping wolf populations in check in order to help protect the moose, caribou, sheep populations in the region.

**NOW THEREFORE BE IT RESOLVED:** the Noorvik Native Community Council supports the Board of Game proposal to allow for the use of snow machines to track and pursue caribou, wolves, and wolverines so that the prohibition against driving, herding, harassing, or molesting game with a snow machine will not apply in unit 23, or other units as determined by the board, while hunting these species.

**CERTIFICATION**

Resolution ---- is approved by poll vote of the Noorvik IRA Council on the \_\_\_\_\_ day of \_\_\_\_\_ by a vote of 7 for, 0 against, and 0 not voting.

  
\_\_\_\_\_  
Lee Ballot Sr., Tribe Manager

  
\_\_\_\_\_  
Joshua Melton, Chairman



Noorvik Native Community  
P.O. Box 209  
Noorvik, Alaska 99763  
Ph: (907) 636-2144  
Fax: (907) 636-2284

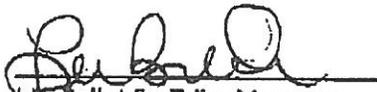
February 11, 2014

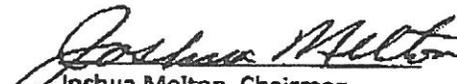
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, Alaska 99811-5526

**RE: Board of Game Proposal addressing unlawful methods of taking game**

We support the Board proposal that would change the general hunting restriction to allow the use of snow machines to track and pursue caribou, wolves, and wolverines so that the prohibition against driving, herding, harassing, or molesting game with a snow machine will not apply in Unit 23, or other units as determined by the board, while hunting these species.

Traditionally the hunters track and pursue game as it is our way of life.

  
Lee Ballot Sr., Tribe Manager

  
Joshua Melton, Chairman



Submitted By  
Norman Pickus  
Submitted On  
2/23/2014 4:51:37 PM  
Affiliation

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I believe it's time to start restricting non resident hunting access, they get percentage wise way to many permits, example, Delta Bison is the most sought after hunt in the state, every year more non residents are getting more and more of these permits, they are on par with residents for selection for a very limited number of permits, some residents have been trying for 40 or more years and will soon be to old to be able to go, this is also true on other hunts, If there are permits not applied for by us residents then non residents should be able to apply and only then. This just proves to us residents that this is NOT for managing the resources but that it's all about MONEY!!! Non resident guides are also an issue, they can't hunt here for some game but they can take other non resident hunters, who was the doo doo who came up with that one??? I hope the board of game starts listening to resident hunters who live here and not just the big game guides who are there to make money. An American Veteran...Rusty Pickus



Submitted By  
otis rowland  
Submitted On  
2/27/2014 1:03:55 PM  
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Proposal 133 don't support



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Proposal 135 I support



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Proposal 134. Don't support



Submitted By  
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Proposal 137 | support



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Proposal. 138 don't support



Submitted By  
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Proposal 140,142,143,144 | support



Submitted By  
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Proposal 151,152,153,154,155,156,157. I don't support



Submitted By  
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Proposal 159,162,167 | support



Submitted By  
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Proposal 166,172,173,175 I don't support



Submitted By  
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Proposal 170 | support



Submitted By  
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2/27/2014 1:24:02 PM  
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Proposal 171 | support



Submitted By  
Patricia Cue  
Submitted On  
2/26/2014 10:37:36 AM  
Affiliation

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907-299-3610

Email  
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Address  
35360 Robinwood Dr.  
Soldotna, Alaska 99669

I urge the Alaska Board of Game to support Proposal 172 to remove black bear from the fur bearing species designation implemented in 2010. This designation allows trappers to snare black bears which is indiscriminate, cruel, and not biologically sustainable. Because this practice is indiscriminate, other species including brown bears, sows with cubs, pets are being snared. Snaring is wasteful. It's used to kill bears with no purpose other than to reduce this species. Alaska is the only state classifying black bears as fur bearers. Snares are allowed in close proximaty to trails and roads causing hazards for people, their pets and other animals. A living bear is much more valuable to the economy of Alaska by virtue of tourists wanting to view wild animals in their natural environment. The BOG is negatively impacting the tourism industry with this practice. It is past time to end snaring.



Submitted By  
Patricia Gaedeke  
Submitted On  
2/26/2014 10:26:05 AM  
Affiliation

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[windpond@gmail.com](mailto:windpond@gmail.com)  
Address  
P.O. Box 80424  
Fairbanks, Alaska 99708

Please vote YES to stop black bear snaring. (Proposal 172)

I own and operate Iniakuk Lake Wilderness Lodge in Alaska's Brooks Range, located 250 miles from Fairbanks and 60 miles above the Arctic Circle.

It is bad for tourism to promote snaring of these large animals.

Cruel and indiscriminate snaring is no way to treat Alaska's Bears.



Submitted By  
Patrick Bradburn  
Submitted On  
2/27/2014 10:34:36 PM  
Affiliation

Proposals 151-155 regarding changes to migratory birds seem like a waste of time and effort. In my opinion these are proposals set to add more unnecessary confusion to established regulations that often times seem cluttered as is. Thank you for letting me include my opinion.



Submitted By  
Patrick Haggerty  
Submitted On  
2/27/2014 1:00:43 PM  
Affiliation

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[captpatrick@maineseaduck.com](mailto:captpatrick@maineseaduck.com)  
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159 Peter Vier Rd  
Durham, Maine 04222

I have visited Alaska once in 2012 for a sea duck hunt. I have been a waterfowl guide, specializing in sea duck hunts here in Maine for 23 years. I am just beginning my traveling hunting future and I hope to be back to Alaska in 2015 for more sea duck hunting. I find the following proposals ill conceived. They also present a unfriendly tone towards waterfowl hunters. Some clearly are deliberate in attacking the costs associated with waterfowl hunting. Others insult and belittle collectors. I request these proposals be dismissed.

I disagree with Proposal 151, this would certainly add cost to hunts provided by guides thus making future travel to Alaska to pursue my passion more cost restrictive.

I disagree with Proposal 152, it is absurd. It is an accepted practice to remove only the breast meat from wildfowl worldwide. The state of Alaska should not present such a unfriendly attitude towards waterfowlers.

I disagree with Proposal 153, it is just a repeat of the above mentioned absurdity, proposal 152.

I disagree with Proposal 154. It is not practical for a traveling waterfowl collector to harvest the meat. Birds must be frozen whole so the chosen taxidermist, who may be several states away, can take the proper measurements of the carcass to provide the highest quality mount. Once the taxidermist is ready to mount the waterfowl, usually within 1 year of harvest, and rarely sooner the taxidermist will skin the bird using a borax solution to 'dry' the blood to help keep feathers clean. I am supposed to inject borax contaminated meat? Without this borax the time to clean the blood from the feathers would add a substantial amount of money to the cost of taxidermy work.

Furthermore I am sickened by the statement 'squandered for an ornament'. My waterfowl taxidermy will be in the Maine State Museum when I am gone. They will provide other Mainers the educational opportunity to see species of waterfowl from Alaska. Others donate the taxidermy collections to sight impaired organizations, for more educational experiences.

I disagree with Proposal 155. 'Continuing Confusion in possession limits!' The only confusion I have is how anyone could think these simple laws are confusing. 20 sea ducks per season no more than 7 per day, no more than 4 of any one species in Unit 10 for non residents. Pretty simple please do not make the mistake of complicating waterfowl hunting.

Thank you



Submitted By  
Rich Duane Russom  
Submitted On  
2/27/2014 9:17:35 AM  
Affiliation  
Registered Voter-Illinois

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Email  
[rich@russom.com](mailto:rich@russom.com)  
Address  
1120 Patton Avenue  
Lake In The Hills, Illinois 60156

I am asking you to please **strongly support Proposal 172**:

Proposal 172 (page 246), submitted by AWA and authored by former AWA Board member and current Advisory Board member Valerie Connor, would remove black bears from the classification of "furbearer" species in the state's wildlife management regulations. The BOG changed the bears' species classification from "big game" to "furbearer" in 2010, thereby allowing trappers to catch and kill the animals using snares.

Following are some suggested talking points for your comments. Please feel free to use a few or all of these, or use them as ideas to write comments in your own words:

- \* Scientists overwhelmingly agree that bear snaring is indiscriminate, cruel and not biologically sustainable.
- \* Because bear snaring is indiscriminate, females with dependent cubs and cubs themselves are at risk. Grizzly bears and other non-target species are caught and killed in snares. Bears have one of the lowest reproductive rates and it is for this reason modern scientific management principles discourage killing females.
- \* Snaring is egregiously wasteful. There is no requirement that meat from bears killed in snares be salvaged for human food. They are being killed for the simple purpose of decimating yet another predator species.
- \* Snaring is an extremely controversial method of killing wildlife, regardless of the species targeted. The BOG tarnishes Alaska's image for residents and non-residents alike by insisting on continuing its cruel and unnecessary war on predators. Bear snaring has never been allowed in Alaska since statehood - until the BOG approved and implemented an experimental snaring program in 2010.
- \* No other state - among the few still fortunate enough to have bear populations - classifies the animals as furbearers.
- \* Snaring creates dangers for other consumptive users, hikers and their pets 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 extremely dangerous.
- \* Snares are allowed as close as ¼ mile beside maintained trails and roads used by the public. A bear investigating a baited snare could cover ¼ mile and attack an unsuspecting hiker in as little as 30 seconds - an unwarranted and unacceptable danger to the public.
- \* 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.

On behalf of Alaska's wildlife. Cruel and indiscriminate snaring is no way to treat our bears.

As ever, thank you for your commitment to Alaska's wildlife.

Best regards,

Rich Russom



Submitted By  
Robert Kirk  
Submitted On  
1/12/2014 5:53:05 PM  
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noatak

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I request that the law requiring a hunter to step off a motor vehicle while hunting an animal be reevaluated to accurately portray the hunting practices in unit 23.



Submitted By  
Roy Braswell  
Submitted On  
2/28/2014 4:59:21 AM  
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I'm a non-resident hunter who has been on one sea duck hunting trip to Alaska. It was an incredible experience and will undoubtedly lead to future hunting trips to Alaska. I spent a relatively large sum of money while on this trip in Alaska and I believe many others do the same; the economic impact of out-of-state hunters in Alaska is tremendous. Proposals 151 - 155 are anti-hunter proposals that will limit out-of-state hunters' participation (and thus economic impact in Alaska) and also impact the livelihoods of those who rely on migratory bird hunting. The guides that I hunted with and around are 100% committed to the sustainability of migratory bird hunting; they recognize that without sustainable populations they will be out of work.

**Proposal 151** - This proposal, as presented, is unnecessary. As a hunter, I am more than happy and willing to provide information regarding the number, species, and quantity of all birds I harvest. If this information is desired it should be administered similar to the USFWS Harvest Information Program (HIP) that is currently in place. At the time of purchase of a license ask the hunter if they intend to hunt sea ducks; if they do, send a survey to them after the season asking what was harvested.

**Proposal 152** - This proposal is presented in a way that suggests hunters should be required to pluck all waterfowl. This is not necessary to gather all "edible meat" and would eliminate the opportunity of bringing home trophies. The waterfowl hunts that provide the largest economic impact to the local communities in the state of Alaska are typically geared towards trophy hunts. The current wording is clear in that "edible meat" from waterfowl is the meat of the breast; this proposal creates an area of confusion for hunters and law enforcement alike.

**Proposal 153** - The definition of "edible meat" for waterfowl is 'the meat of the breast'. The definition of the hindquarter is irrelevant.

**Proposal 154** - The definition of a trophy does not need to be revised. The requested addition of "after all edible meat has been salvaged" is addressed in the wanton waste of game section of the hunting regulations.

**Proposal 155** - This proposal is basically irrelevant to a non-resident hunter such as myself and is virtually 100% unenforceable; the only people this goes to harm is people who are strictly hunting for meat. If you are only allowed to have one limit of a species of migratory game birds in your possession and your "possession" includes meat in the freezer such as sausage or jerky, how can anyone tell what species of duck and/or how many are in a certain batch of sausage or jerky? Additionally, if you end the season with one limit of birds in the freezer and finish eating them within one or two months, you can no longer have any meat from migratory birds until the next hunting season. Imagine if this were the case with fish or big game.

I truly appreciate your time, respectfully ask for consideration to *not* support Proposals 151-155, and look forward to future hunting trips to the great state of Alaska.

Thank you



Submitted By  
Rudy Wittshirk  
Submitted On  
2/26/2014 3:12:40 PM  
Affiliation  
self

Bear Snaring proposal 172 - Opposed. Snaring is a vicious and cruel way to treat a bear.



Submitted By  
Sharon Stroble  
Submitted On  
2/26/2014 4:15:23 PM  
Affiliation  
CITIZEN

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Seattle, Washington 98119-2412

I urge you to remove blackbears from being classified as "furbearers" who can be trapped with snares that are indiscriminate in who they kill. Female bears reproduce slowly and cubs are also vulnerable. There is not a good reason to continue the furbearer classification for Black Bears, and every reason to reverse it.



Submitted By  
Sherrie Myers  
Submitted On  
2/26/2014 11:04:22 AM  
Affiliation

I STRONGLY SUPPORT proposal 172 to STOP BEAR SNARING:

- \* Scientists overwhelmingly agree that bear snaring is indiscriminate, cruel and not biologically sustainable.
- \* Because bear snaring is indiscriminate, females with dependent cubs and cubs themselves are at risk. Grizzly bears and other non-target species are caught and killed in snares. Bears have one of the lowest reproductive rates and it is for this reason modern scientific management principles discourage killing females.
- \* Snaring is egregiously wasteful. There is no requirement that meat from bears killed in snares be salvaged for human food. They are being killed for the simple purpose of decimating yet another predator species.
- \* Snaring is an extremely controversial method of killing wildlife, regardless of the species targeted. The BOG tarnishes Alaska's image for residents and non-residents alike by insisting on continuing its cruel and unnecessary war on predators. Bear snaring has never been allowed in Alaska since statehood - until the BOG approved and implemented an experimental snaring program in 2010.
- \* No other state - among the few still fortunate enough to have bear populations - classifies the animals as furbearers.
- \* Snaring creates dangers for other consumptive users, hikers and their pets 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 extremely dangerous.
- \* Snares are allowed as close as ¼ mile beside maintained trails and roads used by the public. A bear investigating a baited snare could cover ¼ mile and attack an unsuspecting hiker in as little as 30 seconds - an unwarranted and unacceptable danger to the public.
- \* 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.



# Sitka Tribe of Alaska

Tribal Government for Sitka, Alaska

February 5, 2014

Alaska Board of Game  
Alaska Department of Fish and Game  
P.O. Box 115526  
1255 W. 8<sup>th</sup> Street  
Juneau, AK 99811-5526

**RE: Sitka Tribe of Alaska's Comments on 2014 Statewide Board of Game Proposals**

Dear Board of Game,

I write on behalf of Sitka Tribe of Alaska (STA), tribal government for over 4,800 tribal citizens located in Sitka, Alaska. As a tribal government, STA is responsible for health, welfare, safety and culture of its citizens. STA it respectfully submits the following comments in opposition to 2014 game proposals 135, 136, 137, 139, 140, 156, and 157.

**Proposal 135**

"Customary and traditional Alaska Native funerary or mortuary religious ceremonies" have and will continue to occur within and outside the State of Alaska. This proposal is not only discriminatory toward Alaska Natives but contradicts Title VIII of the Alaska National Interest Lands Claims Act (ANILCA).

**Proposal 136**

This proposal is confusing and unnecessary. If the Alaska Department of Fish and Game (AGF&G) felt there was a need to further differentiate between harvesters to determine the amount necessary for subsistence, it would have initiated a similar proposal.

**Proposal 137**

STA supports the original intent ANICLA, which was to address the intentional omission of aboriginal subsistence rights under the Alaska Native Claims Settlement Act. The intent of this proposal is to further the gap between state and federal subsistence regulations.

**Proposal 139**

This proposal is not only confusing it's also unnecessary.

**Proposal 140**

ADF&G's Division of Subsistence conducts subsistence harvester surveys that provide accurate and reliable harvest data. Studies show that harvest data submitted voluntarily is more accurate than data that is collected by mandate. This proposal is another attack on subsistence in Alaska

FEB 12 2014

BOARD



and an attempt to discredit current (established) and future amounts necessary for subsistence totals. Further, if the Division of Subsistence felt the data it was collecting was invalid or inaccurate it would have generated a similar proposal.

Proposal 156, 157

These proposals are unnecessary in that they attempt to modify current administrative codes that are adequately defined and meet their intent. They also would cause some traditional Native foods (fermented meat) to be in violation of the law.

If you have any questions regarding these comments contact STA's Resource Protection Director Jeff Feldpausch at (907)747-7469 Or email [jeff.feldpausch@sitkatriben-sn.gov](mailto:jeff.feldpausch@sitkatriben-sn.gov).

Sincerely,

A handwritten signature in cursive script that reads "Michael A. Baines".

Michael Baines  
Council Chairman



Submitted By  
Steve Bergh  
Submitted On  
2/14/2014 11:55:50 AM  
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Falconer

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Chugiak, Alabama 99567

The proposal presented by Alaska Falconers Association is an excellent proposal that I support but wanted to emphasize this priority. The non-resident take issue allowing out of state falconers to trap raptors from Alaska should be limited to passage birds and not birds still in the nests. The taking of eyas birds should be allowed for Alaska resident falconers only.

Thank you for your time. -

Steve Bergh



Submitted By  
Susan Downes-Borko  
Submitted On  
2/27/2014 4:56:16 AM  
Affiliation

Dear AK Dept of Fish and Game:

We are writing to voice our strong support for Proposal 172.

As 9-year residents of AK and 10-year residents of Maine, we understand the relationship involving humans, black bears and the environment.

Science is behind the argument that bear snaring is not exact enough, with non-target species being caught, pregnant and mother bears being caught and potentially humans being hurt. It is cruel, unnecessary and can be wasteful.

There is a very good reason why no other state in our country classifies black bears as "furbearers".

We strongly support Proposal 172 and request your support.

Sincerely Yours,

Victor and Susan Borko



Submitted By  
Timothy Sell  
Submitted On  
2/12/2014 9:36:14 AM  
Affiliation  
Alaska falconers as.

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Anchorage, Alaska 99516

Concerning proposal #174. Traditionally nonresident take (nrt) isn't asked of a state until the state's falconry club has agreed to its attempt. This proposal was submitted by an outside falconry group of questionable repute and it was not invited here by the Alaskan falconers association, the state's association of falconers that has worked long and hard to maintain a good relationship with our local fish and game departments and USF&W. We have respected the laws and spent limitless time improving the situation for all Alaskan falconers. If indeed this nrt is a constitutional requirement I would ask that it be limited to passage birds only and limited to 5 opportunities for take a year, as perscribed in the Alaska falconers association's white paper. Passage only protects sensitive eyrie sites, would limit outside falconer/native corporation interaction and is generally a safe and conservative start for a nrt. Also I would ask for a sunset clause so that if things do go poorly the nrt could easily be discarded. Thanks, Tim Sell



IN REPLY REFER TO

## United States Department of the Interior

## FISH AND WILDLIFE SERVICE

1011 E. Tudor Road  
Anchorage, Alaska 99503-6199

FWS/OSM 14016.PM

**FEB 28 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 March 14-18, 2014, to deliberate proposals concerning changes to regulations governing hunting and trapping of wildlife for the Statewide Regulations, Cycle A Schedule. We have reviewed the 42 proposals the Board will be considering at this meeting and the Office of Subsistence Management (OSM) does not have any comments at this time.

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

Sincerely,

Gene Peltola, Jr.  
Assistant Regional Director, OSM

cc: Tim Towarak, Chair, Federal Subsistence Board  
Chuck Ardizzone, Wildlife Chief, OSM  
Cora Campbell, Commissioner, Alaska Department of Fish and Game  
Kristy Tibbles, Board Support Section, Alaska Department of Fish and Game  
Jennifer Yuhás, Federal Subsistence Liaison Team Leader,  
Alaska Department of Fish and Game  
Interagency Staff Committee  
Chuck Ardizzone, OSM  
Administrative Record



Submitted By  
wade  
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2/28/2014 3:52:10 PM  
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Unalakleet, Alaska 99684

Board of game,

My name is Wade Ryan a member of SNSAC. I support Prop 177 for the use of a snowmachine in pursuit of caribou, wolf and wolverine. I would like to also see this amended to include our region 22A also the use of ATV's. SNSAC will meet and vote on this Prop 177 in the next week, we have a meeting planned. Thank you for your ear.

Wade Ryan acting Chair SNSAC



Submitted By  
Warren brown  
Submitted On  
2/9/2014 3:09:32 PM  
Affiliation  
Waterfowl guide

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Seldovia, Alaska 99663

#### Proposal 151

The federal waterfowl managers and the State waterfowl managers are not requesting this proposal. They are not asking for additional work and cost to support this, either are any guides or hunters. This is one person's opinion on how to micro manage seaduck guides for their own benefit.

There are very few active seaduck guides in Alaska. We don't put a dent in the overall seaduck population. The seaduck harvest is minimal compared to the vast areas sea ducks inhabit and the total amount of sea ducks in the State. So how is all this reporting going to help or change anything?

This proposal is an unnecessary burden on the guides so one person can keep track of our statistics and use it against us somewhere down the line.

#### proposal 152

The Federal government already has definitions of edible meat for waterfowl that we follow. Some early season birds have pin feathers and cannot be plucked, so they are skinned and breasted. I personally pluck every puddle duck that I can but good luck plucking a seaduck.

#### proposal 154

No "confirmation" of the use of "trophy" meat is needed. It would be a waste if not utilized. All my seaduck hunters use the meat from the different ducks they shoot.

#### proposal 155

This is an attempt to change federal law and drop the possession limit from 3 days bag limits (on most species) to a single day's bag limit. I'm sure if the federal waterfowl managers thought this was necessary they would decrease the possession limits themselves.



## Western Arctic Caribou Herd Working Group

*Goal: To work together to ensure the long-term conservation of the Western Arctic Caribou Herd and the ecosystem on which it depends, to maintain traditional and other uses for the benefit of all people now and in the future.*

Chair: Vern Cleveland, Sr.

Vice-Chair: Cyrus Harris

P.O. Box 175, Nome, AK 99762

February 28, 2014

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

SUBJECT: Board of Game Proposal XXX – 5AAC 92.080(4) and (5). Unlawful methods of taking game; exceptions.

To the Alaska Board of Game:

On behalf of the Western Arctic Caribou Herd Working Group, the group's Executive Committee is submitting a **comment in support of the Board generated proposal** to "change the general hunting restriction to allow the use of snow machines to track and pursue caribou, wolves, and wolverines so that the prohibition against driving, herding, harassing, or molesting game with a snow machine will not apply in Unit 23, or other units as determined by the board, while hunting these species". The Board will consider this proposal at its March 2014 meeting.

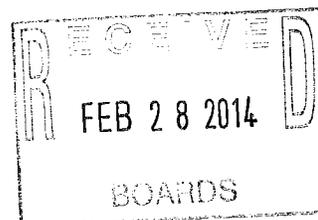
The Working Group does not believe that this regulation change would affect the abundance or population trend of the Western Arctic Caribou Herd. This change would accommodate local hunting practices that have been used since snow machines first arrived in Game Management Unit 23, and addresses the need for rural subsistence users to be able to use the most efficient methods to take wild resources important for their livelihood, particularly with consideration to the high price of food and fuel in northwest Alaska.

Thank you for this opportunity to comment.

On behalf of the Western Arctic Caribou Herd Working Group,

*Vern Cleveland Sr.*

Vern Cleveland, Sr., Chair



**Western Interior Alaska Subsistence Regional Advisory Council**

c/o U.S. Fish and Wildlife Service

1011 East Tudor Road, MS 121

Anchorage, Alaska 99503

Phone: 907-786-3888 or Fax: 907-786-3898

1-800-478-1456

RAC WI4005.CJ

**FEB 14 2014**

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

Dear Mr. Spraker:

The Western Interior Alaska Subsistence Regional Advisory Council (Council) is one of ten Councils formed under the Alaska National Interest Lands Conservation Act (ANILCA). The Council is authorized by Title VIII of ANILCA to provide a forum for expressing opinions and offering recommendations on any matter related to subsistence uses of fish and wildlife within the region.

The Council held a public meeting on December 11, 2013, to discuss Federal wildlife proposals and other matters related to subsistence in the Western Interior Region. During that meeting, the Council took public testimony on Alaska State Board of Game Proposals 50, 56-58, 70, and 71.

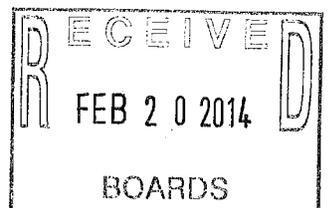
The Council provided an opportunity for public testimony on these proposals and deliberated and took final action by unanimously opposing Proposals 56, 57, and 58. The Council supports Proposals 50, 70, and 71. The reasons for opposing or supporting specific proposals are stated below.

**Proposal 50: Support**

There are customary and traditional uses of the Teshekpuk Lake caribou herd in Game Management Unit (GMU) 24, which should be included in the ANS analysis. The herd has been migrating into the GMU 24 around Anaktuvuk Pass and to the south of the unit.

**Proposals 56, 57, and 58: Oppose**

The Council feels it is important if bears are baited, the meat should be salvaged. The utilization of meat should be encouraged and waste of the resource should not occur.





Mr. Spraker

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**Proposal 70: Support**

The Council is in support of retaining the winter registration hunt for GMU 24B and amend the language to include GMU 24C of the original hunt area without a sunset.

**Proposal 71: Support**

We support the Koyukuk River Advisory Committees proposal to reinstate the original boundaries of the controlled use area which are still in Federal regulation. There is always pressure to reduce the size of the area and the purpose for the original establishment of those areas.

Thank you for the opportunity to assist the Board in meeting its charge of protecting wildlife resources for all Alaskans and for the opportunity to comment on these State proposals. We look forward for continuing discussions about the issues and concerns of subsistence users of the Western Interior Region. If you have questions about this correspondence, please contact me via Melinda Burke, Subsistence Council Coordinator, with the Office of Subsistence Management (OSM) at 1-800-478-1456 or (907) 786-3885.

Sincerely,

A handwritten signature in black ink that reads "Jack Reakoff".

Jack Reakoff, Chair

cc: Federal Subsistence Board  
Western Interior Alaska Subsistence Regional Advisory Council  
Geoff Haskett, Regional Director, Region 7  
Eugene R. Peltola, Jr., Assistant Regional Director, OSM  
Karen Hyer, Acting Assistant Regional Director, OSM  
David Jenkins, Policy Coordinator, OSM  
Trevor Fox, Acting Wildlife Chief, OSM  
Carl Johnson, Council Coordination Division Chief, OSM  
Jennifer Yuhas, Federal Subsistence Liaison Team Leader  
Alaska Dept. of Fish and Game  
Administrative Record