

Date: January 10, 2012

RC 4

To: Alaska Board of Game @ 907-465-6094

Subject: Alaskan Preference hunting

I have read an article that appeared in the Fairbanks newspaper titled "Preferences for Alaskan's" written by Thomas Lamal. I agree with Mr. Lamal. It would seem Alaska state hunting regulations and the State Board of Game seems to give preference to non-resident hunters. This seems to me to be backwards: I feel preference should be given to resident Alaskan hunters and have a cap on non-residents (10% is the general rule). I am attaching a letter I wrote about some of my experiences and am sending it to you in the hope that a comment from you to the Board of Game may change their methods. In the future we need to have BOG members that support resident hunters. Anything you can do in this regard to help residents of Alaska will be appreciated.

Thank You,



Ken Rocheleau

Anchorage

907-346-2012

P 184

First and foremost I am a believer in efficient and effective Wildlife and Game management. Over the years I feel the Alaska Department of Fish and Game has done a fairly good job in this regard. However, I also feel the Game management side of this effort needs to do more to protect the rights and privileges of local resident Alaskans in their pursuit of available game.

I had been raised as a boy to get involved in outdoor activities and while growing up in Minnesota hunting was a passion I deeply enjoyed. My wife and I moved from Minnesota to Alaska in 1973. Although my first year as a non-resident we struggled financially I did manage to purchase a non-resident hunting license (\$35) and also obtained the non-resident moose tag for \$100. All of my available weekends that first fall were spent hunting. I did manage to get a few birds in that first year but the moose proved to be an elusive critter and it took me a few years to master the skill, effort and luck to bag one. As most hunters learn the skill required is mostly location, location, location.

Today that skill requirement has not changed. However, what has changed is that Alaska is now more than ever on the world-wide hunting map. Now above and beyond normal hunting strategies resident hunters must compete with the outside influence of non-resident hunters. I will give you an example: In 2011 my two sons and I were flown into an area in unit 20A we have hunted for more than twelve years. When we landed we found a part 135 flight operator had flown in two guys from Colorado. In Minnesota congested hunting is expected and all you have to do is wear blaze orange and pick a different tree. But due to the different strategies used in the pursuit of animals in Alaska we did conflict with the Colorado hunters on several occasions. Mostly it was that we both converged on the same hill to glass and the non-residents ended up just chasing the animals in their haste to bag one. It frustrated me, but hey I've been in that situation before, my sons hadn't. It was a learning experience for them.

We have most recently been doing most of our moose hunting in Unit 20A. This area is now one of the most hunted in the state. It has received ADF&G newsletter news, special population counts, and hundreds of internet blogs discussion. Everyone is tuned in to Unit 20A and to our dismay Unit 20A is the area of choice for many non-resident moose hunters as well. We cannot compete with the influx of non-resident hunters. Non-residents apparently have the time, money and means to explore in Alaska... There is nothing to stop non-residents from dominating the Alaskan hunting environments.

During our (at times unfortunate) meetings with the Colorado folks we learned several interesting things. Primarily we learned that everyone comes to Alaska to hunt because it is the least expensive place in the country to hunt large animals. Other states charge for permit application fees and Tag fees compounded by land fees and guide fees. Resident hunters in Colorado pay upwards to \$6000 for ranch access fees alone. After thinking about what they had told us I began to think of my two grandsons and their future in having hunting experiences such as I have enjoyed. The reality is that there may not be any hunting future for our grandkids unless the State of Alaska wakes up and adjusts to the pressure residents are getting from non-resident hunters.

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Fist off- Non-resident hunters seem to have limitless funds to chase game around the world but at the same time they try to be somewhat frugal in their efforts. Choosing the least expensive state to hunt is a no-brainer for most budget minded people. Hence Alaska pops up as the number one choice.

We now have an abundance of ways to access hunt areas with vehicles such as Argos and airplanes. An Argo is difficult for a non-resident to get here so the most likely choice for them is a drop-off- hunt via airplane. And believe me when I say there are a lot of airplanes here in Alaska.

The problem that I see is that Part 135 and fixed base operators (FBO) have mushroomed to the point that Alaska resident hunters must choose between hunting with non-residents at the same landing strips or maybe not-at-all. (The strip we land on is far from being an improved area and would be classified as a Super Cub landing spot.) This scares me when I look forward to the limited opportunities for my children and grandchildren. It is quite possible hunting may not exist in twenty years due to the high cost and expense related to reaching the isolated access areas required to be successful. It is my belief when hunts are no longer successful no one will hunt.

Hunting is an activity I love and I feel we must preserve this very important resource for the future of all resident Alaskans.

I also need to point out it is my belief that too many hunting guides have access to more area than can effectively limit the resident/non-resident conflicts. I remember the time in my early days where a friend of mine and I tried to hunt Brown bear from Mother Goose Lake airstrip on the Alaska Peninsula. After we were dropped off by airplane we learned a guide from Fairbanks was using the area as a Base Camp for his spring hunt operation. It was chaotic. The non-residents were hooting and hollering, shooting firearms and partying the whole time we were there. Needless to say all the bears were not anywhere near that area and our hunt ended with an early pick-up. This sort of thing happens much too often where a guide assumes dominance in a given area. Hunting guides should be limited to an area of access and to the number of non-residents they are permitted to guide at a given time. This method has been effective in Kodiak Island for Brown bears and should be applied to all of the species throughout the state. If there is an over abundance of animals in a given area residents should be given priority. We must do this to insure our future generations' resident hunting and to support necessary and effective game management.

Additionally, in order to improve hunt success Alaska hunters are being encouraged to apply for more and more permits in order to hunt within certain areas. These are not being offered at any small cost. This cost has the potential to increase hunters overall expense and does not offer any guarantees of being selected. The three hunters in our family spend almost \$300 a year for permit fees and many times are not selected for any hunt. This cost as well as the added costs for location area access to get away from hunter congestion in the future may become cost prohibitive for the average family. I would hope we do not have to resort to blaze orange and a different tree.

P 384

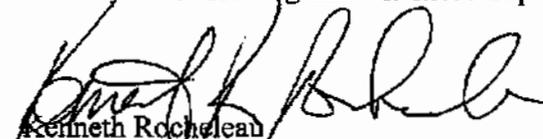
Suggestions:

1. **For non-resident hunters make all big game hunt areas drawing permit only. Similar to the method many states outside establish hunts. (Arizona for example)**
2. **Give preference to resident hunters for all current hunt areas.**
3. **Limit the number of part 135 drop offs of non-resident hunters**
4. **Registered guides should be limited to a number of non-resident clients at any given time. (The overall hunt experience for resident hunters should be more important than registered guide profits.)**

We must improve the prospects for resident hunting in Alaska and preserve this wonderful sport and great exercising pastime and at the same time encourage efficient and effective game management. If we do nothing, hunting as we now know it will soon disappear in Alaska.

Lastly, If and when we change the rules of preference toward Residents of Alaska the non- residents can move to Alaska as I have for preferential hunting opportunities.

Thank you for reading this and more important thank you for considering my viewpoints,



Kenneth Rocheleau
Anchorage, Alaska

CC: Sons: Nathan Rocheleau, Anchorage
Adam Rocheleau, Fairbanks

Grandsons: Kaden Rocheleau
Ryder Rocheleau

1484



An Alaskan Corporation
2231 Green Forest Drive
Palmer, AK 99645

RC5

January 9, 2012

To whom it may concern:

I'm strongly against proposal 49: "Require logbooks of taxidermists and provide authority to the Alaska Wildlife Troopers to inspect taxidermy paperwork."

I believe no changes should be made. It puts another regulation on small businesses. As you know, we as a country are telling government to stop more regulations on small business. I can't see proposal 49 as being a benefit. I'm sure that Alaska Wildlife Troopers (AWT) could come up with hundreds of ways to make their job easier. The question is how far the AWT should go.

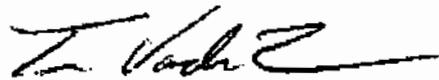
I've hunted Zimbabwe and I had to have a government official with me at all times. Is that what we want? If the Alaska Board of Game enacts this regulation, the State will continue building on it within a short period of time. For example: When the seat belt law went into effect, they said you wouldn't be stopped and ticketed. Look where we are today. Fishing guides were told they just had to register so the State would know how many guides there were. Look at the law today.

We're being told this is just a small regulation to monitor us. I believe this proposal in time will be a burden on Taxidermist. This regulation should and must be voted down.

In closing, I believe that the Alaska Board of Game should be Alaska residences' watchdog. The State should not over regulate small businesses.

Thank you for your time.

Sincerely,



Timothy Vanden Toorn

Ph: (907) 745-6186
FAX: (907) 745-6186

Physical Address: 2231 Green Forest Drive
(Located by 4 corner s in Palmer)

Web Site: www.trophytanning.com
E-Mail: info@trophytanning.com

RC6

To: Alaska Board of Game

13 January 2012

Boards Support Section

P.O. Box 115526

Juneau, AK 99811-5526

Fax: (907) 465-6094

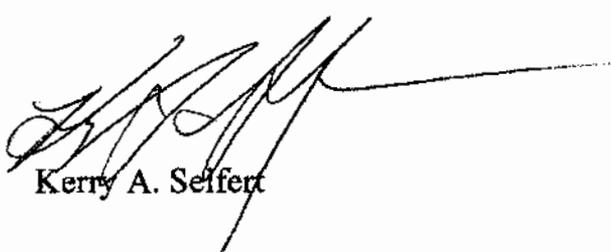
Dear Alaska Game Board Members,

My name is Kerry Seifert. I have been a licensed falconer since 1968. I've been actively practicing in Alaska since 1978. I will not overwhelm you with a lengthy narrative at this late time however wanted to express my request to **please consider accepting and adopting Proposal #38 as written by the Alaska Falconers Association**. Most falconers, myself included are very proud and thankful of our ability to practice falconry here in Alaska and generally are a self policing and respectful of our privileges.

An extreme amount of time, thought, and discussion has gone into this proposal #38 as written and again respectfully ask for your favorable consideration of this document.

If you have any questions for me please feel free to contact me, (907-350-6266) at your convenience.

Thank you all for your time.



Kerry A. Seifert

01-01-12

MIKE'S WELDING
 P.O. BOX 827 • PM 262-1323
 STERLING, ALASKA 99672

RC7

Dear, Board of Game.

I have lived of the peninsula since 1986 + hunted moose all of these years.

I go on a different adventure every weekend in the wild. I took the trapping course in 1987 under ED BANGS KENAI NAT. Wildlife Refuge Manager at the time. I did not decide to trap until last year 2010 + snared 2 wolves. Yesterday I checked my

snares this year + caught 2 more wolves. I travel from Sterling to the mystery creek mountains + to Skilak Lake + to King Lake + Swanson river area. I come across wolf pack tracks of up to 20 animals. Kenai Nat Wildlife Refuge is doing nothing to improve moose browse habitat. They do little small tracks that attract moose to a small contained area + then the wolves know right where they are. These are wolf buffet tracks - also more bears than have ever been seen ever. My first years up here I never ever saw + brown bear. Now I see 2-10 brown bear every year. I support any predator control by any means + I support habitat Large Scale Michael + Kurn

Jan 9, 2012

Chairman Cliff Judkins

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

RC 8

Dear Chairman Judkins,

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

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

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

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

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

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

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

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

Proposal 126: exempt NPS lands from trapping of black bears

Thank you.

Sincerely,

Mr. Allan Slipher
10 Harborview Dr Unit 10
Port Townsend, WA 98368-9550
(360) 379-9972



RC 9

PO Box 213, Glennallen, AK 99588 ~ Phone: (907) 822-5778 ~ Fax: (907) 822-5338

www.ahtnaheritagefoundation.com

January 6, 2012

Cliff Judkins, Chairman
Alaska Board of Game
Boards Support Section
PO Box 115526
Juneau, AK 99811-5526

RE: Proposal 41 - 5 AAC 92.034. Permit to take game for cultural purposes.

Chairman Judkins,

Please accept the following brief comments on behalf of the Ahtna Heritage Foundation in regards to Proposal 41 - 5 AAC 92.034 Permit to take game for cultural purposes. We urge the Board of Game to review the scope of the permit and clarify its intent.

The Ahtna Heritage Foundation believes that this permit was created for the purpose of passing on traditional, cultural knowledge to the youth of Alaska and it should not be interpreted to imply otherwise. These permits should remain available for educational and cultural camps that actively engage our youth in traditional methods of handling and preparing wild game. The Ahtna Heritage Foundation has utilized this permit over the years in our own culture camps, and in those that we have partnered with, in order to teach our young people how to carry on their traditions. There are other organizations in our area that use this permit as well, and it has always been our understanding that it was for educational purposes.

We do not believe that this permit should be made available for business meetings or "events". To allow corporations to utilize this permit could set precedent allowing for the taking of game for any meeting, of any organization, of any size. We do not feel that this was the intent of the permit.

Thank you for taking the time to consider our comments and we hope that you will make the right decision in dealing with this issue.

Tsin'aen,

Liana Charley John
Executive Intern

RC 10

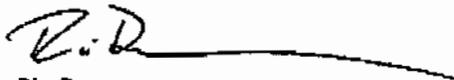
Hello! My name is Rio Demers and I have been an apprentice falconer on Kodiak for two years now. I was unable to trap a bird on the mainland so I was able to find a sponsor in Oregon who was generous enough to not only help me trap a bird, but opened his home to me for the two weeks I was there. I was the second falconer from Alaska that he helped. I learned a tremendous amount from this gentleman and his experience and willingness to help made the entire process one I will never forget.

Please adopt proposal #38 as written by the Alaska Falconer's Association, as I think it is only fair for those in the lower 48 to be extended the courtesy and professionalism that was offered to me and other falconers who had to travel to trap a bird. I honestly cannot see many falconers coming up to trap birds here as it is hard enough and the expense will be considerable. I fully support them having the option and the money they spend here is always a bonus.

This sport means the world to me and I really look forward to being an active falconer for many years to come. There are not many of us, but the falconry community is a communicative and social one. Please keep the sport alive and fair to all.

Thank you very much for your time and consideration!

Sincerely,



Rio Demers

Alaska Board of Game, Board Support Section Juneau AK
FAX 907-465-6094

RC 11

My name is Randall Compton. I have been a falconer in alaska for more than 30 years. I have given numerous demonstrations and school presentations, 'Hunting&FishingDay, as well as other F&G events. I volunteer and enjoy a good relationship with F&G fairbanks.

**Please adopt proposal# 38 as written by the
Alaska Falconers Association.**

Thank you for your time and attention to these matters.

Randall Compton
state permit no. 09-009-f
master, class



Jan 5, 2012

Chairman Cliff Judkins

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

RC12

Dear Chairman Judkins,

Theodore Roosevelt would turn over in his grave if he knew how our national wildlife refuges and parks have been turned into killing fields. Our national parks belong to all of the people and should not be used as private hunting and trapping grounds.

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

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

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

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

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

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

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

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

Proposal 126: exempt NPS lands from trapping of black bears

Thank you.

Sincerely,

Ms. Diane Weinstein
24116 SE 45th Pl
Issaquah, WA 98029-7524
(425) 391-3909



United States Department of the Interior
NATIONAL PARK SERVICE

Alaska Region
240 West 5th Avenue, Room 114
Anchorage, Alaska 99501

RC13

IN REPLY REFER TO:
N12 (AKRO-ARDR&S)

December 29, 2011

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

Dear Chairman Judkins:

The National Park Service (NPS) appreciates the opportunity to comment on the Statewide, Cycle B Schedule proposals being considered by the Alaska Board of Game (BOG) at the meeting on January 13-17, 2012; in Anchorage. There are a number of proposals before the BOG that affect or have the potential to affect NPS areas in the state. Our comments are organized by the proposal index of topics listed for this statewide regulations meeting. We appreciate your consideration of our comments.

As you have heard from the NPS in the past, our mission and mandates differ from the State of Alaska and other federal agencies, and may require different management approaches consistent with NPS enabling legislation and the Alaska National Interest Lands Conservation Act (ANILCA). We recognize and support the State's fundamental role in wildlife management, while at the same time we must assure that the laws and regulations of the National Park Service are upheld.

Our specific comments on proposals follow:

Sale of Big Game, Big Game Trophies: Proposals #44, 46 – 48

Proposals 46-48 request changes to 5 AAC 92.200. Purchase and sale of game. Proposal 44 requests that Governor's tags cover periods of time when hunting seasons are not open. State regulations classify black bear, brown/grizzly bear, bison, caribou, Dall sheep, Sitka black-tailed deer, elk, mountain goat, moose, muskox, wolf and wolverine as big game animals. The development of a cash economy associated with the sale of big game has often been shown to be detrimental to the species involved. The commercial sale of big game animals provide economic incentives that may lead to the wanton waste. Should the Board adopt regulations that expand the sale of big game, NPS lands need to be excluded. NPS regulations prohibit the sale or commercial use of animal products taken from NPS areas (other than trapping).

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Statewide Big Game Seasons: Proposals #72-76, 78- 86

These proposed regulatory changes would establish earlier big game and sheep seasons for resident hunters and youth, compared to non-residents' seasons. This creates likelihood of state and federal seasons becoming out of alignment in most regions. Seasons and bag limit proposals are usually the primary focus of regional meetings and not statewide regulation meetings. In order to properly evaluate the impacts of these proposals on specific hunts, they should be considered at the appropriate regional meetings for discussion and analysis. Depending on the area and hunt, changing seasons could interfere with long established state and federal subsistence priorities. Regional meetings would also allow for better public notice and provide the opportunity for the Board to hear from a broader range of users and managers within the affected region.

Statewide Trapping: Proposal #93

This proposal would allow only the use of traps and snares for wolf & wolverine on NPS lands and prohibit the use of firearms except for dispatching trapped animals. The use of firearms under the authorization of a trapping license is generally not allowed on NPS lands, except as is necessary to remove an animal from a trap, or for reasons otherwise related to human safety. 'Hunting' under the authority of a trapping license could lead to increased take and potentially raise conservation concerns. The NPS generally supports this proposal.

Statewide Other Game Seasons: Proposal # 94

This proposal would prohibit the taking of wolf, fox, wolverine, or coyote during May, June, and July on NPS lands. Trapping or hunting seasons that extend into the late spring and summer months, when pelts have little economic value, are generally attempts to reduce predator populations. This is also a time when the raising of vulnerable offspring occurs and the newly born are dependent upon adults for their survival. Also, the taking of furbearers when pelts are not prime may reduce the future opportunity for those who desire to harvest prime pelts. Intensive management or abundance-based management practices, which manipulate predator populations in an attempt to increase other wildlife populations, are not consistent with NPS statutes and policy. The NPS supports this proposal.

Methods and Means: Proposals # 97-98, 100

These proposed regulatory changes address the use of artificial light and other electronic devices in the taking of game. Hunting practices that involve the use of artificial light have been prohibited since statehood, with limited exceptions. Consistent with sound wildlife management and conservation, methods of take that disturb animals when they are in a vulnerable state, should be avoided. Vulnerable periods include denning, reproducing, early stages in a species maturation or when an animal is injured. For example, the use of artificial light in the taking of denning black bear sows and cubs, or other wildlife, have the potential to impact the natural integrity of a native species. Increased efficiency in taking predator species has the potential to create pressures on the natural abundance, behavior, distribution, and ecological integrity of native wildlife. State laws or actions that seek to manipulate natural wildlife populations for human consumption, or have that practical effect, are inconsistent with NPS statutes and

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policies. If the Board chooses to allow or expand the use of lights, lasers or other electronic equipment, NPS lands need to be excluded.

Methods and Means: Proposals #99, 101 & 114

These proposed regulatory changes would affect same day airborne hunter activities. NPS regulations prohibit same day airborne hunting in NPS areas. Should the Board adopt any proposals that allow same day airborne hunting, NPS lands must be excluded from these activities. (Title 36 Code of Federal Regulations, 13.40 (d) (4)).

Bag Limits: Proposals #107-109

Proposal #107 & 109 would elevate bag limits for black bear. The proposed regulatory change has the potential to create a conservation concern especially in many areas where black bear populations have not been studied. Also, consistent with past letters to the Board, we ask that NPS lands be excluded from any regulations affecting black bears where the intent is to reduce the subject population for the benefit of other species. Should the Board adopt these proposals, NPS lands need to be excluded from these regulations.

Proposal #108 would prohibit the harvest of cubs and sows accompanied by cubs on NPS lands. Allowing the take of bear cubs and sows with cubs creates the potential to deplete bear populations in NPS areas and on adjacent lands. Regulations that allow the taking of sows with cubs are often associated with intensive management strategies which attempt to reduce bear populations to benefit other species. NPS areas must be excluded from these population reduction activities.

Continuation of the natural process is expected in park areas except as specifically authorized by Congress. The taking of black bear sows and cubs sanction practices that have the potential to impact the natural integrity of a native species. The practical effect of these allowances, is increased efficiency for taking predator species and has potential to create pressures on the natural abundance, behavior, distribution, and ecological integrity of these native wildlife species. The written finding of the Board of Game (2006-164-BOG, General Bear Management) is to protect sows and cubs from harvest, "unless it is necessary to consider methods to increase bear harvests as a part of a bear predator control program." State laws or actions that seek to manipulate natural wildlife populations for human consumption, or have that practical effect, are inconsistent with NPS statutes and policies and exceed Congress's authorization in ANILCA.

Evidence of Sex, Transfer & Possession: Proposals #110 – 112

Proposals #110 – 112 request changes to 5 AAC 92.150. Evidence of sex and identity. The requirement for hunters to report evidence of sex provides state and federal wildlife managers with needed harvest information to support management decisions affecting wildlife populations.

Black Bear Baiting: Proposals #114–119& 121-123

Proposals #114-119 & 121-123 request changes to 5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures. The NPS is concerned about the expansion

9 3 85

of bear baiting. The NPS has a long history of trying to prevent habituation of bears to food rewards both to protect bears and for visitor safety. The NPS also has concerns about bait stations attracting non-targeted species as well as site restoration/cleanup when the hunt is completed. Should the Board adopt regulations allowing the expansion of baiting or the use of sent lures, NPS lands need to be excluded.

Trapping: Proposals #124-128

Proposals #124-125 request changes to 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions. These statewide proposals would require trap identification and set time limits for trap checks on National Park Service lands. ADFG has used these management options in certain areas around the state where trapping occurs near roads, trails and other public access points, and where conflicts with other users groups have occurred. The NPS supports these proposals.

Proposal #126-127 propose to prohibit the trapping of black bears. The use of traps and snares to take black bear is only allowed under intensive management plans adopted by the Board of Game, and is currently not allowed in any NPS areas. The NPS in past letters to the Board has consistently asked that black bears not be classified as furbearers and that NPS lands be excluded from any regulations allowing black bears to be snared or trapped. For many years, general wildlife conservation practices prohibited this method of taking black bears. This method can result in the taking of other non-targeted wildlife species. In addition to conservation concerns, bear trapping can lead to visitor safety issues where there is the potential for high use of an area by non hunters. Also, where the intent of regulations are to reduce black bear populations for the benefit of other species, these regulations are inconsistent with NPS statutes and policies and exceed Congress's authorization in ANILCA. Should the Board adopt any proposal that allows or expands the trapping of black bear, NPS lands need to remain excluded.

Intensive Management: Proposals #129-131

Proposals #129-131 request changes to 5 AAC 92.125. Intensive Management Plans. As previously stated intensive management practices including predator control activities are not allowed on NPS lands. Native predator populations may not be manipulated, controlled or eradicated for the purpose of increasing harvestable species on NPS lands. Should the Board authorize any predator control programs in Game Management Units that contain NPS lands, these lands need to be excluded from the plans.

Again, we appreciate the opportunity to provide you with comments on these important regulatory matters and look forward to working with you on these issues. Should you or

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your staff have any questions please contact Debora Cooper at (907) 644-3505 or Dave Mills at (907) 644-3508.

Sincerely,



Debora Cooper
Associate Regional Director
Natural, Cultural and Subsistence Resources

cc:

Cora Campbell, Commissioner, ADF&G
Corey Rossi, Director, Wildlife Conservation, ADF&G
Kristy Tibbles, ADF&G
Pat Pourchot, Special Assistant to the Secretary for Alaska
Geoff Haskett, Regional Director, FWS
Chuck Ardizzone, FWS
Joel Hard, Superintendent, Lake Clark NP&P
Ralph Moore, Superintendent, Katmai NP&P
Paul Anderson, Superintendent, Denali NP&P
Rick Obernesser, Superintendent, Wrangell-St. Elias NP&P
Frank Hays, Superintendent, WEAR
Jeanette Pomrenke, Superintendent, BELA
Greg Dudgeon, Superintendent, Yukon-Charley Rivers NPRes/Gates of the Arctic NP&P
Susan Boudreau, Superintendent, Glacier Bay NP&P
Debora Cooper, Associate Regional Director
Dave Mills, Subsistence Team Leader
Sandy Rabinowitch, Subsistence Manager
Chris Pergiel, Chief Law Enforcement Officer, NPS-Alaska Region

P 5 85

RC 14

Fox Creek Canyon Ridge Land Owners Association



FOR: GAME BOARD, ANCHORAGE MEETING JANUARY 2012
MAIN POINT: NO ON PRO 35 & 36- MORE (NOT LESS) WOLVES, PREDATORS ARE CRITICAL

Game Board Members please note,

November 7, 2011

Because it will kill our already devastated ecosystem, ariel wolf-shoots (*"intensive management plan"*) won't be tolerated by Fox Creek Canyon Ridge land owners. Due to you meeting 1000 miles beyond our lands (you seek to control) we are sending our **OPPOSITION TO PROPOSALS 35 AND 36.**

Reality is, wolves and other predators here are so rare, rabbits are over-populated, starving, and devouring spruce saplings critical to replacing our bark beetle killed forest. This once abundant old-growth ecosystem (you call GAME UNIT 15C) is struggling to survive the **beetle epidemic and habitat destruction of Bradley Lake Dam-** and unregulated hunting, and trapping.

Wolves, coyotes, and lynx have been exterminated, here, to the point rabbit-excess is unprecedented and no "natural cycle."

"The rabbit problem was caused by Alaska Department of Fish and Game allowing an over-kill of lynx a key predator," said Kenai National Wildlife Refuge Ecologist Mark Laker.

Such rabbit activity has never occurred as far back as 30 years- see photos (pages 2 and 3) taken on GMU 15 C's Fox Creek Canyon rim November 2011. Rabbit over-population is so extensive the Kenai Peninsula Borough's reforestation program is compromised by voracious bunnies.

"To prevent one million spruce seedlings from being devoured we've coated them with gallons of rabbit-repellent from the local feed-store," said KP Borough Spruce Bark Beetle Mitigation Manager, Duane Bannock.

AS THE RABBITS PROVE, more, not less, wolves are needed in Game Units 15C, 15A, and borough wide. Obviously, **Prop 35 and Prop 36 are absurd and illegal** in serving vested-interest hunters' groups at the expense of valuable ecosystems belonging to all Alaskans.

AK Fish and Game says, cow to bull ratios are down so more wolves must be killed *"intensively managed."* Their cartoon is, wolves, not hunters, are gunning for trophy bulls.

The public sees this for what it is- just BULL. AK Fish and Game is proposing an illegal give-away of wildlife they've sworn to hold in safe-keeping (for ALL ALASKANS) under the Public Trust Doctrine.

Sincerely, Ingrid Peterson, President Fox Creek Canyon Ridge Land Owners Assoc.



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GMU 15 C / TWO MILES NORTH OF KACHEMAK BAY / FOX CREEK CANYON RIM / 11-6-2011



YOUNG SPRUCE GIRDED BY RABBITS

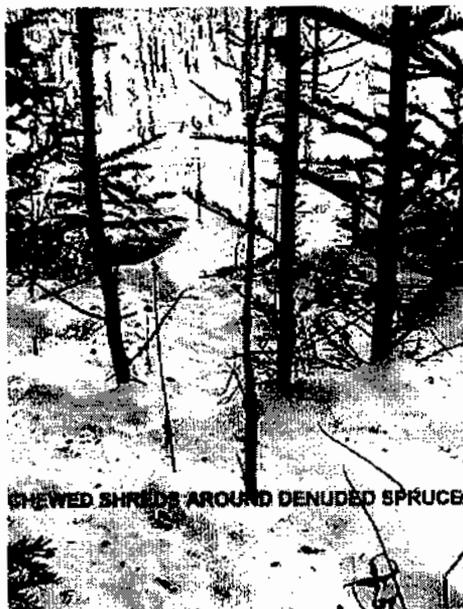


DETAIL OF GIRDED SPRUCE



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GMU 15 C/ TWO MILES NORTH OF KACHEMAK BAY/ FOX CREEK CANYON RIM/ 11-6-2011



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RC 15



IN REPLY REFER TO:

NWRS712-121

United States Department of the Interior

FISH AND WILDLIFE SERVICE

1011 E. Tudor Road
Anchorage, Alaska 99503-6199



DEC 27 2011

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

Dear Chairman Judkins:

The U.S. Fish and Wildlife Service (Service) appreciates the opportunity to comment on proposals to be considered by the Alaska Board of Game during its meeting in January 2012 to address proposals that would be implemented statewide. We would like to provide the following comments on Proposals 44, 46, 50, and 113, which could affect management of wildlife populations on many of our National Wildlife Refuges (Refuges) around the State.

Proposal 44 would add discretionary authority to all the Alaska Department of Fish and Game (ADF&G) to possibly change and define specific seasons and methods, and means of hunting for recipients of the Governor's tags for sheep, musk ox, brown bear, moose, caribou, and wolf.

The Service is neutral but concerned that if season dates or methods and means were changed to be outside those already allowed that it may increase costs on Refuges for law enforcement and/or may impact on-going projects/studies. It also appears that this could allow for same day airborne hunting, which does not adhere to fair chase principles of hunting. If such hunts were to be authorized in areas that include Refuge lands we would respectfully request that ADF&G work with our local Refuge managers to address these concerns prior to a hunt.

Proposal 46 would allow for the sale of big game trophies.

The Service is opposed to this proposal as written. If allowed, this could lead to an increased commercial market for Alaskan trophy animals or their parts. This could also lead to increased poaching and escalate law enforcement efforts that are already stretched to their limits. If this is allowed, a permit and sealing system should be required to track each trophy's origin and its sale(s) to ensure that the animals were taken legally.

Proposal 50 could repeal discretionary hunt conditions and procedures applied to permit hunts across the State.

TAKE PRIDE
IN AMERICA 

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The Service understands the need to periodically review discretionary authorities. However, the Service is opposed to the removal of the discretionary authorities currently used that help provide valuable information to help manage the resource such as destruction of antler provisions, registering at check stations, and mandatory hunter orientation and education courses.

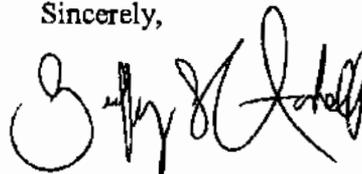
Proposal 113 would remove the reference to Federal fish and wildlife agent under the transfer and possession regulation.

The Service is opposed to this proposal. The Service and Alaska Department of Public Safety, division of Alaska Wildlife Troopers, have a rich history of cooperative enforcement, which greatly enhances the conservation of Alaska's wildlife resources throughout the State. The two enforcement agencies share many common enforcement priorities and bring unique authorities to meet these shared goals. When requested, the Service assists the Alaska Wildlife Troopers meet their wildlife conservation mission by continuing investigations of suspected wildlife violations throughout the lower-48, and internationally if required. We may use proof of unlawful possession of fish or game parts as a predicate for Federal violations. Additionally, we assimilate State regulations within our Refuge specific regulations found at 50 CFR Part 36, which enables our enforcement officers to issue violation notices on Refuge lands for State violations, including illegal transfer of possession, which this proposal would eliminate.

The proposer references concern about Federal agencies enforcing policy and not following the law. We would be interested in hearing more about this specific concern and be given the opportunity to address it specifically.

Thank you for your time to review our comments on these important issues.

Sincerely,



Regional Director

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