

**Alaska Board of Game**

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**On Time Public Comments**

**Southeast Region Meeting**

**Juneau, Alaska**

January 9-13, 2015

**ALASKA BOARD OF GAME**

**Southeast Region Meeting**

**Juneau, Alaska**

**January 9-13, 2015**

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# 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-RNR)

NOV 07 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:

A number of proposals before the Board of Game (BOG) for the January 8-9, 2015, work session and meeting in Juneau may affect or have the potential to affect National Park System areas in the Alaska. We appreciate your consideration of our comments.

As you know, the National Park Service (NPS) mission and mandates differ from the State of Alaska and other federal agencies based on our respective legislation and authorities. We find that most Board decisions are in alignment with NPS management objectives; however, a small percentage of Board actions conflict with the NPS management framework of laws, regulations, and policies. A few of the recent Board-approved liberalized predator harvest methods, seasons, and bag limits exceed the NPS threshold to manage for naturally functioning ecosystems with minimal human intrusions and for other uses and enjoyment of these areas.

Specific comments for the January BOG session are attached.

Sincerely,

Debora R. Cooper  
Associate Regional Director, Resources

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  
Philip Hooge, Superintendent, Glacier Bay  
Diane Chung, Superintendent, Katmai  
Margaret Goodro, Superintendent, Lake Clark  
Frank Hays, Superintendent, Western Arctic Parklands  
Rick Obernesser, Superintendent, Wrangell-St. Elias  
Bud Rice, Management Biologist, NPS-Alaska Regional Office  
Chris Pergiel, Chief Law Enforcement Officer, NPS-Alaska Region



**Proposal 21: Recommendation: Support**

(Black bear: GMU 1D) This proposal would delay the use of black bear bait stations in Unit 1D until after the brown bear season is closed. This proposal would reduce opportunities for food conditioning of bears, primarily during the first two weeks in September and the month of June. This proposal would be on lands adjacent to Klondike Gold Rush National Historic Park and Glacier Bay National Park.

**Proposal 25: Recommendation: Oppose**

(Ducks: GMU 5) This proposal would move the duck season two weeks earlier in Unit 5 from September 1 – December 16 to August 15 - December 1, which may occur in parts of Glacier Bay National Preserve and Wrangell-Saint Elias National Park and Preserve. Many ducks (and geese) in the area are still in the flightless, molting stage on August 15. The opening day for duck season anywhere else in the State is no sooner than September 1 under existing federal migratory bird regulations, and in areas farther south, such as Juneau, the season does not start until September 16. Therefore, it makes no sense to open the season in Unit 5 to an earlier date than other areas farther up the migratory pathways. In fact, as we experience longer, warmer summer seasons, migratory birds might delay their migrations to later dates on average.

**Regional and Multiple Units**

**Proposal 28: Recommendation: Oppose**

(Wolverine GMUs 1-5) This proposal would extend the wolverine trapping season in Units 1-5 to align with the wolf season, November 10 to April 30. Affected areas may overlap parts of Glacier Bay National Preserve, Wrangell-Saint Elias National Park and Preserve, and areas adjacent to and within the boundaries of Klondike Gold Rush National Historic Park. The proponent indicates this proposal would enable trappers to keep wolverine unintentionally caught in wolf traps and snares. Unit 5 has not had a reported instance of this happening. The extension would almost double the season length on a low density population. The value of the fur is also minimal after mid-February.

**Proposal 30: Recommendation: Oppose**

(Black bear: GMUs 1-5) This proposal would remove the reporting requirement for GPS coordinates for bear bait stations in Units 1-5. This proposal may affect bear baiting practices in parts of Wrangell-Saint Elias National Park and Preserve, Glacier Bay National Preserve, and lands adjacent to or within the boundaries of Klondike Gold Rush National Historic Park. The requirement for GPS coordinates of active bear baiting stations is an important tool to assure compliance with State regulations.

**Proposal 31: Recommendation: Oppose**

(Black bear: GMUs 1-5) This proposal would change the bag limit restriction for black and brown bear in Units 1-5 as follows: either 1) eliminate the regulation that states in Units 1-5, a bear wounded by a hunter must count as the bag limit for the year, or 2) insert the word



“mortally” in front of wounded. This proposal may affect bear hunting practices in parts of Wrangell-Saint Elias National Park and Preserve, Glacier Bay National Preserve, and lands adjacent to or within the exterior boundaries of Klondike Gold Rush National Historic Park. It is difficult for a hunter or guide to determine if a wound to a bear is fatal or not. Wounded bears often die within a week. Any hunter who fails to make a good shot and track down a wounded animal should not get another chance to use their tag. This proposal could result in excessive harvest of bears and wanton waste. Also, raising the allowable take (which definition includes the attempt to take) without considering effects on game populations and behaviors in each game management area could violate area management objectives.

**Proposal 32: Recommendation: Oppose**

(Black bear: GMUs 1-3) This proposal would allow the transfer of resident harvest tickets to a relative within second-degree of kindred as follows: in units 1, 2, and 3 allow resident black bear hunters to transfer one of their two harvest tickets to a relative within second-degree of kindred. Only one bear could be a glacier bear, and the resident hunter must accompany the nonresident relative in the field. This proposal may affect hunting practices within the exterior boundaries of Klondike Gold Rush National Historic Park and adjacent to Glacier Bay National Park. This proposal could result in party hunting by non-residents, which would make enforcement much more difficult.

**Proposal 33: Recommendation: Oppose**

(Exceptions to Taking of Game: GMUs 1-5) This proposal would remove the restriction against using felt sole waders while hunting in Southeast Region Units. The proposal could result in adverse effects in all four National Park System areas in Southeast Alaska where hunting may occur on or near these areas. As has been documented elsewhere, relaxing the prohibition on use of felt-soled waders can result in the introduction of debilitating fish diseases and invasive species.

**Proposal 36: Recommendation: Oppose**

(Black bear in GMUs 1-5) This proposal would remove the requirement to clean up contaminated soil from bear bait stations for Southeast Region Units. This proposal could affect bear hunting practices in parts of Wrangell-Saint Elias National Park and Preserve, Glacier Bay National Preserve, and lands adjacent to or within the exterior boundaries of Klondike Gold Rush National Historic Park. Food-contaminated soil could condition bears to human foods and lead to bear-human conflicts. Opening the door to partial clean up, rather than full removal of a bait station, may not prove prudent from an enforcement standpoint or otherwise. If a hunter hauls in tubs or barrels of food, then the hunter should have adequate capacity to remove food-contaminated soil. These materials should be disposed of in approved landfills or burned offsite at approved facilities, not scattered about the landscape to biodegrade or act as fertilizer as the proponent suggests.



**Proposal 37: Recommendation: Oppose**

(All Game Species in GMUs 1-5) This proposal would add five days to all resident hunting seasons and allocate 75% of the drawing permits to residents in the Southeast Region as follows: For the benefit of all Alaska residents change current regulations in all Southeast units so the residents of the State of Alaska receive preference in regard to all hunting opportunities. For harvest ticket hunts allow state residents to start hunting seasons five days early, or allow state residents to hunt five additional days after the season has closed for nonresidents. This proposal could affect state-managed hunting seasons in Wrangell-Saint Elias National Preserve and Glacier Bay National Preserve. In general, we believe season extensions should be considered on a species-by-species and unit-by-unit basis to ensure conservation of specific populations, rather than applied to all species throughout the Southeast Region.

PROPOSAL 13 - 5 AAC 92.008. Harvest guideline levels. Change the management level for wolves in Unit 2 to include all causes of mortality for wolves and in addition recommend the harvest level be lowered from 30% to 20%.

RECEIVED  
DEC 08 2014

BOARDS  
ERRATA

**I support proposal 13**

Name	Address
Anna Morpurgo	99801
Jon Lyman	99801
Lesley M. Lyman	77801
Matthewson	95701
Arcie Cross	99801

PROPOSAL 26 - 5 AAC 92.108. Identified big game prey populations and objectives.

RECEIVED  
DEC 08 2014

BOARDS

**I support proposal 26**

Name	Address
Anna Morpurgo	99801
Lesley M Lyman	77801
Matthewson	95801





Submitted By  
Thor Stacey  
Submitted On  
12/26/2014 12:20:31 PM  
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po box 211231  
Auke Bay, Alaska 99821

Dear Alaska Board of Game Members,

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

#### **Second Degree of Kindred:**

Alaska's Professional Hunters have recently (past 10 years) struggled with developing a clear position on allocation of tags to non-residents hunting with Alaskan relatives within the 2nd degree of kindred. AS 16.05.407 clearly delineates who can accompany non-resident hunters pursuing; Dall Sheep, Brown/Grizzly Bear and Mountain Goats. What is not clear and therefore the within the purview of the Board of Game (BOG), is how those tags should be allocated. Should non-resident relatives be considered residents or non-residents, or should they be set-aside in their own category? Without clear statutory direction, the BOG has implemented a variety of allocation strategies in a pragmatic effort to address allocation concern across a vast State with different needs and scenarios. At this point, the APHA does not see the need for statutory allocation direction or a statewide BOG policy on 2nd degree of kindred provisions. However, the BOG should always seek to derive the maximum benefit from our game resources while making preferences between beneficial users. **Where game populations are subject to more demand for harvest than supply; we ask that the BOG recognize that guided non-residents have a much higher associated benefit to the State than unguided non-residents.**

#### **Guide Industry Facts (McDowell 2014):**

- 89% of licensed Guides are Alaska Residents (Registered / Master Guides)
- \$78 Million of Total Economic Activity
- \$51 Million in New Dollars to the State Economy
- \$13 Million in wages in **Rural Alaska**
- \$12 Million in spending on Goods and Services in **Rural Alaska**
- \$1.95 Million in Direct Revenue (ADF&G) in Non-Resident License & Tag sales
- Contributed to the 14.9 million in Pitman-Robertson funds in 2012.
- Guided Hunting Provided 2,210 jobs

Regardless of whether or not a big game animal is a guide required species or not, professional guide services provide added value and benefit to Alaska's economy, especially in rural Alaska. Guided hunters are also more likely to transfer possession of their meat to their guides, who in turn share that meat with local communities and other Alaskans. Much of this activity is for animals that are not guide required thus no 2nd degree of kindred provision. Guided hunts provide Alaskan jobs and support rural infrastructure all the while keeping much of the valuable meat in Alaska.



Second degree of kindred hunts, on the other hand, provide little added value to the economy and a high likely hood of harvested meat leaving the State. What 2nd degree of kindred hunts do provide for is family hunting connections and heritage. The value of the hunting tradition and this heritage is something that all hunters recognize. As a group of hunters, the APHA recognizes this value. This balance

of resource valuation allows us to support limiting the number on 2nd degree of kindred hunters for brown bear in unit 4 while supporting family hunts for black bears in region I.

#### **Carry Over Comments from the 2014 Board of Game Cycle:**

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

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

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

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

#### **Individual Proposal Comment**

Below you will find our comments on individual proposals under your consideration for Region I. Leading up to the drafting of these comments the APHA held a tele-conference and invited all of its members to participate in the drafting of these comments. This tele-conference was well attended with good representation from guides who conduct hunts in Region I. You will find that there are some proposals that we don't have comments listed for. These were proposals that we felt did not directly impact guides or that are outside of the groups purview. We also chose, in a couple of instances, to group similar proposals together and combine our recommendations. While these comments represent the voice of our group, you will undoubtedly get comments from APHA members who want their individual positions considered as well. Because the APHA takes a statewide perspective when approaching Board proposals, we urge you to consider regional expertise from our members even when their position is different from that of the APHA. Finally, we thank you for your consideration and urge you to reach out to our membership for clarity and details on proposals before you, either on a unit-by-unit or



regional basis. Given the opportunity, Alaska's hunting guides will continue to bring a wealth of wildlife and hunting knowledge and experience to table.

## Proposal #11--SUPPORT

We strongly support limiting the number of non-resident 2nd degree of kindred brown bear **hunters** in Unit 4. This limitation was discussed and fully vetted by the Unit 4 Brown Bear working group and is included in the final "Unit 4 Brown Bear Management Strategy" (pp 12-13). We suggest you approach this proposal in two parts:

### Hunter Effort vs. Harvest:

The Unit 4 BBMS was drafted in the spirit of social and biological compromise. One of the main factors that necessitated the BBMS was the loss of the ability of the state of Alaska to limit the number of registered hunting guides operating in the ABC Islands. Increased guiding pressure, other increases in hunting pressure, and increased DLP mortality has resulted in occasional mortality levels above the maximum values established for individual island groups and GMU4 as a whole. Crowding, user conflicts and concern for the loss of the valuable economy that local hunting guides bring to the region brought about two moratoriums on the number of guided non-resident hunters unit wide, and eventually to the management system detailed in the BBMS. Guided hunts were to be managed based upon historic use levels at that time with an allowance for attrition both in numbers of guides and in numbers of guided hunts. A critical component of this compromise was the idea that non-resident 2nd degree of kindred hunters would be **also** held to a limited number of hunters, not harvest.

Even though the Unit 4 BBMS is explicit in its recommendation on how many non-resident 2nd degree of kindred hunters should participate in the hunt, this management measure has yet to be implemented. Stepping back from proposal 11 for a moment; we would like to note that where the Unit 4 BBMS has been followed and implemented the resource and surrounding social considerations have generally benefitted with less conflict between users and a healthier resource. We would also like to note the total human mortality goal of 4% is an extremely conservative number that was part of a resource/user group compromise removing the need for more dedicated bear viewing areas (closed to hunting). As part of this agreement, hunters "shared the burden" to prevent more areas being closed to hunting. Following the guidelines set out in the Unit 4 BBMS and limiting the number on non-resident 2nd degree of kindred hunters was part of the "shared burden" and was intended to ensure the maximum benefit to the region from non-resident allocation.

### Implementation, Fair Permit Award:

One major point of consensus between our members is that a relative who is planning on coming to Unit 4 to hunt with his or her family members should be able plan his or her trip well ahead of time. This goal would seem to favor a drawing type hunt system and not a registration hunt. After careful consideration and a fair amount of discussion, we decided that **a drawing hunt was not** the most favorable situation for residents and their relatives. Our first, best, solution for doling out these permits is as follows:

**Follow the "Hot Spot" moose hunt, type, registration model but have the list of potential hunters generated at least 90 days before the season. Every potential non-resident hunter with a 2nd degree of kindred relative who wants to put in for the tags does so before a certain online application deadline. The list is then closed, and then the names are sorted by the department, randomly. Starting at the top of the sorted list each hunter is called and asked if they intend to hunt. If they answer in the affirmative, they get a tag, if they don't the next alternate on the list is called. This will allow full use of the dedicated allocation while, at the same time, giving family members plenty of time to plan their trip and not be disappointed in a "first come, first serve" registration scenario. Due to the low number of tags, this should be easy for the Department to implement and administer.**

### Status Quo-Prop 11 Fails:

If Prop 11 fails to pass, the trend of an increasing number of non-resident 2nd degree of kindred relatives will continue. Because this "user group" tends to harvest a high percentage of females and young males, their disproportionate effect on the harvest parameters set-out in



the Unit 4 BBMS will continue. The result of this trend not only has a detrimental impact on the resource, but in addition will debit, reduce and restrict the very valuable guided non-resident allocation. This growing impact of the least valuable non-resident allocation will threaten the very foundation of the Unit 4 BBMS. Both the biological and socioeconomic priorities, central to the Unit 4 BBMS compromises, will suffer at the expense of an allocation that was intended, from the beginning, to be "capped."

### Proposal #12- Oppose

We oppose Prop. 12 for the following reasons:

1. Attaching a tag to each harvested wolf, at the kill site, would require a new locking tag system for both trappers and resident hunters. This is expensive and unnecessary.
2. Often times persons share skinning responsibilities and/or contract them out for the purpose of good fur handling. The correct handling of the fur is essential for preserving a harvested wolf maximizing the pelts use. Technically, a person helping skin could find themselves in "possession" of a wolf, while they were not the trapper/hunter.
3. Registering trap sites is not practical because catching wolves requires that a trapper be able to adapt to diverse situation in the natural world. Wolf trap sites cannot be planned out on a map nor is it fair to restrict boat based effort when traps are necessarily moved to adapt to animal behavior and changing conditions.
4. Combining trapping and hunting bag limits disadvantages the most successful wolf trappers. Trappers that are effective at catching this highly intelligent animal should be able to harvest as many animals as possible until the unit's quota is met. This system handles conservation concerns, while allowing the most successful trappers to profit from their hard earned skills until the quota is met.

### Proposal #31- Oppose

We oppose Prop. 31 because our membership has strong feelings about "fair chase" hunting and resource stewardship and conservation. Experience has taught us that bears, in particular, are easy to wound and lose when shots are taken at long range or in other questionable situations. As guides, hunters and conservationists we have both a legal, and moral obligation to ensure that wound loss is minimized. The consequence to the hunter of an animal wounded but not recovered greatly encourages ethical hunting practice, benefits the resource, and improves the overall hunting experience. If Prop. 31 is passed, more hunters will tend to take questionable shots, and more animals will be wounded and lost.

### Proposal #32- Support

Standing:

APHA brings this proposal before the board in an effort to improve a compromise that has conserved black bears and protected guide businesses. Though this proposal directly benefits a few Alaskan families and their non-resident relatives, it also benefits the guide businesses and our members by reinstating a hunting opportunity that was inadvertently lost. As commercial operators who benefit from a public trust resource, it is in our long and short-term interest to respect other users. Because region I's black bear compromise was drafted by hunting guides to deal with the unregulated and growing number of unguided non-resident black bear hunters and with clear concern to not impact Alaska residents, it is therefore appropriate that we come forward with an overlooked issue that, once solved, will not result in a measureable harvest, let alone, a conservation concern for some time to come.

Conservation:

The APHA maintains strong support for dividing non-resident take into to categories: *guided and unguided*. This is justified from a conservation perspective based on historic trends in the number of unguided-non-residents hunters in the field and the unsustainable harvest by this user group. The potential for excessive effort and harvest from unguided-non-resident hunters is due to the fact that **black**



**bears are not a guide-required species** (guide required species are: dall sheep, brown/grizzly bear and mountain goat) so in America is a potential user. Guided-non-resident black bear hunters, on the other hand, are already limited by the finite number of land use authorizations issued to the Region's guides on both public and private land. The conservation approach used in developing the new system also creates a reduction in guided black bear hunting opportunity based upon the guided use levels in Regulatory Years 2007-2009. Conservation of Region I's black bears requires the differentiation between users with a limited harvest potential (guides) and those with an unlimited harvest potential (non-guided-non-residents). In fact, region I black bears have proven susceptible to overharvest, especially when easily accessed by the huge pool of potential hunters in the lower 48.

Allocation:

Bifurcating non-resident allocation between those that contract a guide and those who don't, allows for the maximum benefit of the resource. Guided hunts have a significantly higher economic impact than do non-guided hunts. These economic impacts include but are not limited to: new dollars to the economy, employment, purchase of goods and services and license and tag sales. It is to the benefit of local residents, whether they are guides or not, to provide the maximum number of hunt opportunities to guided-non-residents possible. Over allocation of any game resource to unguided-non-residents is akin to voluntarily discounting the price of Prudhoe Bay oil. When a conservation concern arises, we feel it is constitutionally justified to encourage as much of the non-resident allocation as possible to be guided. The current allocation strategy of requiring un-guided-non-residents to draw a black bear tag, while capping the guided hunting numbers clearly maximizes the benefit of the resource.

Solution Offered:

From the guide industry's perspective, the current system of bifurcating unguided and guided black bear harvest is working and working well. Guiding opportunity for Southeast black bears helps maintain viability in local guiding businesses due to the resource being harvested at sustainable levels. However, there are a small number of resident Alaskan's that have annually taken their close non-resident relatives black bear hunting. Because black bears are not a guide-required species, there was no allocation provided to 2nd degree of kindred in the current system. Since the conservation concerns that led to this current system were caused by unguided-non-residents, certain Alaskan families have been partly disenfranchised by the current system. Two solutions present themselves:

1. Make black bears a guide required species with a 2nd degree of kindred provision
- OR
2. Devise a way for 2nd degree on kindred relative to not be impacted by the draw while continuing to differentiate between unguided non-residents and guided non-residents

Option 1: requires a statutory fix

Option 2: presented in the form of Prop. 32

**Proposal #36- Support on a Statewide Basis**

Proposal #36 should be passed because it removes a regulation that leaves too much up to interpretation enforcement. While the intent of the regulation requiring the removal of "contaminated" soil may be to discourage the use of grease or oil at bait stations, the term "contaminated" is too broad in context. Alaska's guides profit from a publicly owned resource thus they are subject to a high level of scrutiny on how they conduct their hunts. When guides are cited or even their employed assistant guides are cited, for even minor violations, serious license actions can and often times do result. Vague or ambiguous regulations should not be passed and if passed, rescinded. Passing Prop. #36 will not result in a negative impact to the resource, therefore we ask that you support and pass it.

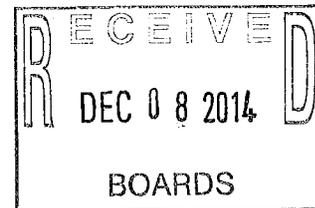


## Proposals #37-38- Oppose

We oppose both of these proposals because they are not conservation based and are purely request to re-allocate the resource. Neither of these proposals discuss the positive economic impacts of **guided non-residents** nor do they recognize the fact that 89% of Alaska's active registered guides are **Alaskan residents** (McDowell, 2014). Alaska's "guide industry" is a rural industry and is an important part of many small communities across the state. Alaska's guides share tens-of-thousands of pounds of meat, while paying wages, while purchasing goods and services in many of the most economically disadvantaged areas across our great state. **Guided non-resident** allocation effectively allocates the resource back to Alaskans, for Alaskans, with a benefit to Alaska that can be measured many times over.



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



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

**December 4, 2014**

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

**On behalf of the nearly 900 members of the Alaska Trappers Association, we wish to share our opinions on several proposals which you will be considering during your January 2014 Region I meeting in Juneau.**

**We OPPOSE Proposal #12. The proposal is cumbersome for the Department of Fish and Game and for trappers alike. There is no scientific or biological rationale for this change.**

**We OPPOSE Proposals #13 and #14. These proposals impose a level of misguided micro-management upon the Department of Fish and Game. The unreported harvest data referred to in the proposal is purely speculative. Furthermore, Proposal #14 places unnecessary restrictions on harvest.**

**We SUPPORT Proposal #15 CONDITIONALLY. There are three conditions to our support:**

- 1) The Department of Fish and Game agrees that there is a harvestable surplus.**
- 2) The State Troopers approve of the change, in regards to public safety.**
- 3) This activity falls under a TRAPPING license.**

**We SUPPORT #28 with the AMENDMENT that the season be extended to the last day of February. ATA does not support the extension of a wolverine season into April, as proposed.**

**We OPPOSE #29. The proposal creates an imposition and danger to trappers by potentially forcing them to travel in hazardous weather conditions simply to comply with an artificial and unnecessary deadline. The proposal also creates a law enforcement burden. There is not a management or biological reason for this proposal.**

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

**Sincerely,**

**Randall L. Zarnke, President**



Comments to the Board of Game South East meeting 9-15 January 201

24 December 2014

Al Barrette

380 Peger Rd.

Fairbanks, AK. 99709

Mr. Chairman and honorable members of the Broad

I submit my humble comments for your consideration.

Proposal 6 Redefine broken antler.

Support as amended:

Repeal current Language in 5ACC 92.150 (c) [ In Unit 1(B), that portion of Unit 1(C) south of Port Hobart, including all Port Houghton drainages, and Unit 3, a damaged, broken, or altered antler is not considered a spike-fork antler as defined in 5 AAC 92.990. ]

Reason for this is clear to me.

1. The same regulation already states: "If antlers or horns must be salvaged, they may not be altered before the completion of all salvage requirements, unless alteration is required under permit conditions."

2. It seem ridiculous that subsistence hunters (moose in 1B and 3 do have a positive C&T) has to not only find a "spike fork" moose, but it has to be a prefect one. No chipped tines, deformities, or broke points. Or how old/fresh is the break or missing point.

3. If individuals are altering before salvage is completed, they are doing so unlawfully. This is an enforcement issue.

4. This regulation (5 AAC 92.150) applies statewide, for all the other units with antler restrictions to include sheep. I harvested a forked antler moose this year that would not be legal in this area. I did not even know such a restriction even existed before this proposal. I was just flabbergasted. That even a past Broad would enact such a restriction.

Proposal 7 define points.

Do Not Support

Reason: current regulation for spike fork is very clear and definable.

Proposal 12, 13, 14 Reduce bag limit for wolves.

Do Not Support

Reasons:



1. Wolf population may have declined. Some of may be due to harvest. But healthy wolf packs will rebound faster than most other large predator species.
2. Please consider setting a range for the ANS, instead of using the term “harvestable portion” this will be of a great benefit to protect subsistence uses.
3. It seems 60 wolves have been the number of wolves that have been allocated for several years. I would like to keep using that harvest.
4. Keeping in compliance with subsistence allocation law.
  - A. Eliminate all non-resident opportunity.
  - B. Depending on the ANS/harvestable surplus, maybe a Tier 1 registration is in order. Because of the quota.
  - C. Last resort Tier 2. if the harvestable surplus is below the minimum ANS.(I don’t think we are there yet).
5. I believe there was some unreported harvest. I also believe there was a lack communication of those not knowing the importance of reporting those wolves to the department. I have great confidence that will not be the issue in the future. Efforts have been made to this issue.
6. E.O. authority is a tool the Department has. It works. I like this could be used instead of even a Tier 1 registration in this case.
7. Extra tagging requirements are not needed. Quicker reporting is better. Furthermore if unreported harvest is the issue, why would those who are believe to be taking wolves and not reporting them, would use locking tags? (again I believe that unreported harvest will be greatly diminish, though education)
8. I have well over 25 years of harvesting wolves and more years handling harvested wolves. I can without a doubt state: “The very vast majority, the “rule” if you will. Wolves that escape from a trap or snare survive”. This is true because trapping methods are not targeting vital organs.

On the other hand shooting at wolves and wounding, would seem to have a higher mortality.

I personally have caught and or handle many wolves with old healed compound fractures, missing feet, toes tails, ears, and holes in skulls, broken healed jaws, missing most teeth, one good eye, and three legged. Not all from trappers or hunters, but from the hard life of being a wolf and doing what wolves do. Wolves are very resilient and hardy if healthy. So to assume that a wolf frees it’s self from a trap or snare that it should be counted as a harvested wolf is not “best science”, or is even remotely true.

Proposal 15 allow trappers to take beaver with a firearm

Support.

Proposal 21 Delay black bear baiting

Do not support.

Reason: There is little no overlap of seasons for grizzly/black bear. Meaning the dates may overlap but the actual take is not. Based on harvest records. Most of all the grizzly harvest occurs well before Black Bear harvest over baits begins.

Proposal 28 extent wolverine season



Support with amendments.

Amendment: Lengthen the wolverine season 30 days. But do not allow the use of leg hold traps after that dated for wolves. Snares only, 3/32 or larger. This opportunity is in place throughout the state and seem to work.

Or leave it alone. Seems to me. That there is very little evidence of wolverines being caught out of season and being surrendered to the State.

Proposal 29 Trap checks

Do not support

Reason: With the unpredictable weather and seas we have in Alaska it is near impossible to be required to check traps on a time frame. Trappers are ethical and responsible. With the adverse environment we do have in this region it would also put the trapping public and Alaska Wildlife Troopers in harm's way, or even those who would be called out to rescue, just to comply with a trap check deadline.

Proposal 30 remove GPS requirements.

Support.

Reason: Not everyone one can afford a GPS and has limited some Alaskans from participating in an opportunity.

Proposal 31 Change bag limit on Black/brown bear

Support

Proposal 35 require certification crossbow.

Do Not Support

Reason: have been finding it very hard to have to be certified for every kind of weapon allow to be used for the taking of game. At what point and cost do we stop this? Or why do we keep piece mealing this. If this is the coarse the BOG wishes to go, then make all weapons and methods have a certification, Statewide. Do not discriminate by zip code.

Proposal 36 remove contaminated soil.

Support

Reason: I firmly believe the definition of bait is clear in this case and also the permit conditions.

5 AAC 92.990 (4) "bait" means any material excluding scent lures, that is placed to attract an animal by its sense of smell or taste; "bait" does not include those parts of legally taken animals that are not required to be salvaged as edible meat if the parts are not moved from the kill site.

5 AAC 92.044 Permit for hunting Black bear with the use of bait or scent lures.



As you see above in the definition of bait, “scent lures” are exempt from the definition of bait.(so there is a clear difference)

If you take the time to read 5 AAC 92.044, in context you will see the same differences. The words “bait or scent lure” is used at least 5 times in this regulation, to include the title of this regulation.

The only part of this regulation that state anything about cleanup of the site is part (10), Permittees must remove all litter and bait. (Bait means excluding scent lures)

Does not say anything about removing scent lures. Under Permit hunt condition, unless someone is inferring “litter” is or includes “scent lure”?

Just bait, litter, and equipment. Very clear. The regulation also uses both bait and scent lure, not as the same, but that there is a difference. ( because the definition excludes scent lure)

I am a trapper I know what scent lures are. Scent lures come in the viscosity of water to a dense paste. So to think you can recover or remove all the soil that is contaminated is somewhat unrealistic. When I have harvested a black bear at my bear bait site, I usually remove the inners and sometimes skin and quarter it on site. Guess what? The soil gets contaminated with the blood, urine and stomach. This does in most cases attach other bears and game.

If soil or vegetation is contaminated with scent lure of a paste in nature, to a watery liquid, I don't feel compelled to remove the soil or vegetation. Under current regulations.

Sincerely

Al Barrette



• **Greenpeace** • **Center for Biological Diversity** • **The Boat Company** •

December 26, 2014

Alaska Board of Game  
c/o ADF&G, Boards Support Section  
[dfg.bog.comments@alaska.gov](mailto:dfg.bog.comments@alaska.gov)

Subj: (1) Comments on Proposals 12, 14 and 26 for the January regulatory meeting;  
(2) Comments for the January 8 workshop meeting.

Dear Board of Game members;

Please consider these comments when you meet in Juneau. The page count of these comments and the supporting attachments in our email submission is within the 100 page limit given in the notice of the meeting. Section 1 of our comments concerns three proposals in the Proposals Book, two of which we submitted.

Section 2 of our comments is about a third, non-regulatory proposal we submitted and which is not in the Proposals Book or on the agenda for either the January 8 work session or the regulatory meeting. Nonetheless, we hope the board will consider it and we wish to introduce it into the public record via these comments.

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**1. Comments on published proposals for the January 9-13 regulatory meeting**

In addition to the comments below, we are including supporting information in *Attachments 1 and 2*.

**A. Comments and Recommendation on Proposals 13 and 14**

Proposals 13 and 14 regard the same topic, which is how to regulate the wolf season in Unit 2. Proposal 13 was submitted by Greenpeace, the Center for Biological Diversity, and The Boat Company. Proposal 14 was submitted by the Alaska Dept. of Fish & Game (ADF&G).

**( i ) The reason we submitted Proposal 13.**

A March 13, 2014 ADF&G press release announced an emergency order closing the Unit 2 wolf season about two weeks early. (*Attachment 1*). From information in the press release it was obvious to us that in its management of the 2014 Unit 2 wolf season ADF&G took the phrase “annual harvest” in the pertinent regulation literally, instead of comprehensively considering all the mortality factors that drive the Unit’s wolf population. The regulation is 5 AAC 92.008(1).<sup>1</sup> That is, season management was based solely on assuring that the verified reported harvest, as enumerated by sealed skins, not exceed a guideline of 30% of the estimated wolf population, a level that is included in the regulation. Because the press release disclosed that the “seasonal harvest limit of 60 wolves ... is 30% of the estimated fall wolf population,” we noted that ADF&G based management of the season on an estimated population of 200 wolves in Unit 2.

This management was consistent with the regulation, but was inconsistent with two facts: (1) ADF&G had estimated that the Unit 2 population could be as low as 150 wolves; and (2) research by ADF&G has determined that the illegal (and therefore unreported) take of wolves in Unit 2 is a significant number. We submitted the proposal to modify the regulation because, with the Unit’s wolf numbers at a low level that is of publicly recognized concern, management should be based on the low end of the population estimate, and the regulation should clearly state that the department must take into account all causes of mortality, not just the number of sealed skins (i.e. “annual harvest” in the current regulation) and the few specific illegal takes (among many) that the area biologist may happen to become aware of. In the case of the March 2014 emergency closure, the illegal take of 1 wolf was known and taken into account; however, this is far lower than the scope of the illegal take of Unit 2 wolves that the department has noted through two radio collar studies. Both studies indicated (through the take of collared wolves) that the scope of illegal take has been approximately equal to the reported harvest (i.e. number of sealed skins).<sup>2</sup>

<sup>1</sup> The regulation reads: “wolves: the annual harvest of wolves in Unit 2 should not exceed 30 percent of the unit-wide, preseason population as estimated by the department.”

<sup>2</sup> The lead researcher, Dr. David Person, averred that the ratio of illegal to legal take may be somewhat lower than 50:50, since some wolves may have been taken illegally (shot and left or harvested but not



**( ii ) ADF&G's submission of Proposal 14.**

It seems that ADF&G's submission of Proposal 14 arose in response to either our submission of Proposal 13 or issues Greenpeace raised with ADF&G personnel in Spring 2014 over the above problems with how the season was managed. To be clear though, we are not pointing a finger at ADF&G or its biologists with Proposal 13, but are simply looking for a correction to a regulation that can be – and actually has been – misleading.

**( iii ) Comparison of Proposals 13 and 14.**

ADF&G opposes Proposal 13 and supports Proposal 14 (RC 2 at 20 & 21). We disagree with the department's assessment and recommendations for the following reasons. We recommend either the adoption of Proposal 13 or a modification of it as described below.

The existing regulation's over-simplified approach to managing the Unit 2 wolf season is a critical problem because the Unit's wolf population: (1) has been declining for a number of years; has declined to a low (though as yet undetermined) number; (2) is isolated and genetically distinct from other wolf populations in Southeast Alaska and North America; and (3) has for several decades been a matter of significant conservation concern to the department, other government agencies and the public. ADF&G's Proposal 14 does not squarely address the problems with the existing regulation, and would merely continue in somewhat modified form the current inflexible and incomprehensive regulatory approach, which will result in non-transparent management and may again sometime in the future lead to a management that is incompatible with wolf conservation.

Our observations are presented in the following subsections, and our recommendations are in the last one.

**( iv ) Why the existing regulation has caused mismanagement.**

Regulation 5 AAC 92.008(1) has caused mismanagement because the term "annual harvest" and the quantity it represents is vague and subject to different interpretations. The department has interpreted the term to mean only the number of sealed skins, i.e. the reported harvest. To conserve a wolf population that is at a low number, all causes of mortality must be taken into account: natural mortality, reported harvest, unreported harvest, wolves shot-and-left, and wounding loss from legal pursuit. Necessarily, some of these quantities have to be estimates, but they all are important components of wolf conservation.

Accordingly, there are two problems with the existing regulation. If its intent with the phrase "annual harvest" is for all causes of human-caused mortality to be taken into account, that is unclear and is now demonstrated to be subject to misinterpretation even by professional wildlife managers. This needs to be corrected. Second, because the 30% guideline is firm and is stated without any context regarding the total mortality percentage (natural and human-caused) that is consistent with a sustainable population, the regulation engenders management by rote instead of being based on biological principles. In short, the regulation is over-simplified and has misled management.

**( v ) Why Proposal 13 would correct problems with the current regulation.**

Proposal 13 would correct problems in the existing regulation regarding three factors:

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submitted for sealing) because they had radio telemetry collars. Nonetheless, he still believed that the scope of the illegal take in the unit is quite high.



1. Natural mortality. The 30% guideline in both the existing regulation and in Proposal 13 is based on an allowance of up to 8% for natural mortality. However, the natural mortality factor is explicit in Proposal 13, but is not evident in the existing regulation even though it was obviously taken into account in crafting the regulation.<sup>3</sup> The proposal is transparent in this regard; the regulation is not.

2. Human-caused mortality. Proposal 13 explicitly notes the types of human-caused mortality must be taken into account. The existing regulation ambiguously calls for basing management on “annual mortality,” which is an undefined term.

3. The population basis for management. The existing regulation does not contemplate that ADF&G’s estimate of the wolf population may be a range rather than a specific number. In fact, the department’s estimate for the 2014 season was 150 to 250 wolves, and the quota of 60 wolves for the season was based on the midpoint (200) of that range, as the number to which the regulation’s 30% guideline was applied.<sup>4</sup>

***( vi ) Why Proposal 14 would not correct problems with the current regulation.***

Proposal 14 would correct only \_\_ of the three problems with the existing regulation.

1. Natural mortality. Like the current regulation, Proposal 14 is non-transparent concerning natural mortality. The proposal changes the guideline from 30% to 20%, so that both natural mortality and to some degree illegal take are considered. But this makes the proposal even more opaque than the current regulation because the amount of natural mortality that the regulation assumes cannot be reverse-engineered.<sup>5</sup> This confounds integrating regulatory management with biological management.

2. Human-caused mortality. In this regard there are two problems with Proposal 14. First, it retains the ambiguous term “annual harvest,” which was an apparent problem with mismanagement of the 2014 season. The term is not defined, and illegal take is not mentioned.

Second, the allowance in Proposal 14 for human-caused mortality (legal and illegal), implemented by changing the guideline from 30% to 20%, is completely arbitrary and non-transparent. If the biological breakpoint for sustainable mortality is 38% of the population and if “annual harvest” continues to be interpreted as the reported harvest (number of sealed skins), the proposed guideline implicitly allows for a combined natural plus illegal mortality of only 18%. With natural mortality being estimated by Unit 2 research to be 5-8%, this means the proposal’s implicit allowance for illegal take is only 10-13%. This is surely far less than the actual amount of illegal take that was evident from the two Unit 2 radio collar studies. But an equally fundamental problem is that Proposal 14 would hard-code this absolutely arbitrary allowance into the regulation. The amount of illegal take (as either absolute number or as a ratio to reported harvest) must be expected to change over time for various reasons, so hard-coding it in the regulation is contrary to wildlife conservation principles.

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<sup>3</sup> ADF&G research has estimated that 38% mortality is the approximate breakpoint for population decline, and that natural mortality is 5-8%.

<sup>4</sup> This is obvious from ADF&G’s 3/14/14 press release:  $0.30 * 200 = 60$  wolves. We also confirmed with the area biologist and WLC’s Region 1 Supervisor (Doug Larsen) that this is how quota was determined.

<sup>5</sup> I.e., for the current regulation a 38% sustainable mortality minus 30% means 8% natural mortality, as is consistent with research data. (Or actually as the 2014 season was managed, the operative assumption that was made therefore was 8% for natural mortality plus illegal take.)



3. The population basis for management. As with the current regulation, in Proposal 14 the basis establishing the seasonal quota for reported harvest is the “preseason population as estimated by the department.” This ignores that fact that ADF&G’s estimate of the Unit 2 wolf population both from research and as used in management has been a range (e.g. 150 to 250 wolves for the 2014 season), not a solitary number. For the 2014 season, the midpoint of the range was arbitrarily used as the basis for calculating the quota. For the 2015 season, the recently announced quota is based on the low end of the range. (*Attachment 2*, ADF&G press release of March 13, 2014). Under Proposal 14, this conservatism may not always be applied in the future, even if the wolf population is low.

4. Proposal 14’s addition of a “restriction to bag limit.” The inclusion of the bag limit restriction does not overcome the substantial deficiencies in other respects of Proposal 14.

5. Conclusions regarding Proposal 14. The proposal would not correct any of the problems of the existing regulation. Although it would result in a lower annual quota for reported harvest, the proposal is contrary in several respects with the conservation of a wolf population that is at low numbers.

**( vi ) RECOMMENDATION – Adopt Proposal 13 or an Amended Proposal 13.  
RECOMMENDATION – Do not adopt Proposal 14.**

We recommend and request that Proposal 13 be adopted as submitted. It corrects the faults of the existing regulation, and avoids the problems and arbitrary management that the competing Proposal 14 would put in place.

An amendment to Proposal 13 the board may consider regards the proposal’s phrase “the Department’s minimum estimate of the unit-wide fall population,” as the basis for determining the seasonal quota. The phrase makes sense for the current low number of Unit 2 wolves; however, if the population becomes substantial again, using the mid-point as the basis may make sense. If that larger population were to begin to decline, the quota could be adjusted in subsequent years to attain sustainability. So, appropriate amendment language may be something like:

“... so that the total annual human take from all causes (reported, illegal and wounding loss) does not exceed 30% of the Department’s minimum estimate (if the number is low or declining) or a larger number from the estimate range (if the population is substantial) of the unit-wide fall population ...”

**B. Comments and Recommendation on Proposal 26**

**( i ) Why we submitted Proposal 26s**

Our Proposal 26 is a request for the Board to revisit the deer population and harvest objectives that the Board set at its meeting in November 2000 for all GMUs in Southeast. The board may not be able to accomplish all that is needed at one meeting, so the proposal also recommends that the Board certain initial actions the board can easily take at its January meeting.

The Board is required by the intensive management law (AS 16.05.255(e)-(g)) to set population and harvest objectives for all ungulate populations in Alaska. The objectives for units in Southeast were the last ones set in the state, at the November 2000 meeting. We have obtained the pertinent official audio recording of that session, including relevant ADF&G’s testimony (its management reports and its testimony on 2000 Proposal 33), and we have transcribed them — see *Attachment 2*.



It is clear in the materials from the 2000 meeting that: (1) the Board was quite uncomfortable setting the objectives for Southeast; (2) it considered the objective-setting for Southeast to be a proforma exercise that is must by law accomplish; (3) members believed Southeast should be exempted from the objective-setting legal requirement; and (4) the objectives for Southeast should be revisited every one to two board cycles. Nonetheless, the board has not revisited the objectives since they were adopted 14 years ago, and circumstances have changed substantially since then.

The population and harvest objectives for Southeast are excessively high. The basis for ADF&G's recommendations at the time were based on populations and harvests that were at a peak. In addition, the department boosted the numbers in its recommendations by 5%, to be optimistic about future hunting potential. In deliberating these numbers, the board was concerned that ADF&G gave precise recommendations down to the last deer (e.g. a population objective of 14,781 deer for Unit 1A).<sup>6</sup> The board recognized that the factors involved were "squishy," and decided that "round, very round numbers" should be used instead. In rounding the numbers, the board then revised *all* of ADF&G's recommendations *upward* to the next highest hundred, further exaggerating them. For all of these reasons, the objectives that were adopted were much higher than they should have been.

At the same time, habitat loss due to logging on the Tongass National Forest and on the region's non-federal lands (owned by the state, the university, the Alaska Mental Health Trust and the Native corporations) had by 2000 taken much of the best deer winter range throughout much of the region — and it continues to do so. Due to the way second-growth forests regenerate, the full loss of habitat capability does not occur until 25-40 years after the logging occurred. This is called "succession debt." Therefore, when the board set the objectives in 2000, the full impact had not yet become apparent from the logging that had occurred since 1975 and some cases as early as 1960. Although habitat loss was briefly mentioned at a few points in the board's discussion, it was not substantively considered and was not taken into account in the final setting of objective numbers. Nonetheless, it is now 14 years later now, much of the succession debt of 2000 has come due and more has been accumulated due to new logging,<sup>7</sup> and deer numbers have declined in the heavily impacted areas of Southeast, particularly in times of severe winters.<sup>8</sup>

For all of these reasons, the deer population and harvest objectives for Game Management Units 1 through 5 are long, long past their expiration date, are excessively high, and are not consistent with sound management of the region's deer.

### ***( ii ) Summary of ADF&G's opinion and recommendation on the proposal***

In its comments (RC-2 at 40-42), ADF&G has a neutral opinion on this proposal and notes its opinions that (1) deer populations are uncertain throughout Southeast, (2) quantitative data for these populations is lacking "for improving IM objectives;" and (3) further near-future work will "help improve future adjustments" to the population and harvest objectives. ADF&G also notes that it "does not have additional or new information to address revisions to the ... population objectives at this time," and recommends retaining the existing objectives for the time being, while additional work is done toward revision. (RC-2 at 42).

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<sup>6</sup> See transcript of the board deliberation, *Attachment 2* at 18.

<sup>7</sup> The forest "succession debt" of today is from logging done since at least 1990 and in some cases as early as the mid-1970s, and it will continue to reduce the winter carrying capacity for deer, and will tend to push deer populations lower and lower.

<sup>8</sup> Despite the fall of 2014 being quite warm, it is important that Southeast had record-setting snowfalls in 2006-2008. The climate is chaotic, and future severe winters must be anticipated.



**( iii ) Our rebuttal to ADF&G’s opinion and recommendation.**

In its comments on Proposal 26 in RC-2, ADF&G has not squarely addressed to problems we raised when we submitted the proposal. In fact, the acknowledgements in the department’s comments that data is lacking or uncertain reinforces our contention that the population and harvest objectives that are currently in force have no justification.

We see no merit to ADF&G’s recommendation that the existing objectives be retained “at this time,” pending further work toward adjustments. While it is good that ADF&G intends to do this work, we believe there is credibility in continuing to rely on objectives that are known to be outdated and faulty. We urge the board *not* to cling to these objectives which bear no relationship to reality, even for an interim period.

**( iv ) Our RECOMMENDATION on Proposal 26**

The first step the board should take – at its January meeting – is to recognize that the deer population and harvest objectives for Southeast are long, long out of date, were set too high in the first place, and were expected (by the board which set them) to be reviewed early and often.

The second step the board should take – also at its January meeting – is to pass a motion that invalidates all of the deer objectives for Southeast and requests ADF&G to prepare proposed recommendations on objectives for a future meeting. The request to ADF&G should include that the department recommend to the board whether it would be beneficial from a wildlife management perspective for the Intensive Management Act to be revised to exempt the board from setting population and harvest objectives for deer in Units 1-5.

**2. Comments on our third, non-regulatory, proposal; and putting it in the record**

**A. Our proposal for a resolution by the Board on the State of Alaska’s “One-voice” policy.**

Earlier this year we made a timely submission of the non-regulatory proposal quoted below, requesting that the board pass a resolution and send letters to the governor and legislature concerning the state’s “one-voice” policy on natural resource management. The policy is detrimental to the management and conservation of wildlife and wildlife habitat in statewide, and particularly in Southeast Alaska. From our submission form:

*What is the issue you would like the board to address and why?*

In 2004, under the administration of Governor Frank Murkowski, the commissioners of the resource agencies of the state (ADF&G, DNR and DEC) adopted a “one-voice” policy that banned separate opinions about resource issues from the three agencies – that is, henceforth the state would speak with one voice on resource issues. (Juneau Empire, 23 Sept. 2004). The directive was not always observed up through the Palin administration, but has been strictly observed under the Parnell administration. In early 2007 the Palin administration created “the State Tongass Team” (STT) – which still exists today. The STT was unknown outside of state government until very recently. It is administered by DNR, which appoints the chairman, and is composed of about 20 high-level state employees from ADF&G; DNR; DEC; DCCED; DOT/PF; Law; and the Governor’s office. It meets monthly or as needed.

The function of the STT has been to bury any issues, information or professional opinions from within any department of the state that may interfere with maximal logging on the Tongass National Forest. The STT exerts top-down pressure on the

resource agencies to, for example, write pallid comments on Tongass National Forest timber sale environmental impact statements, and filter-out any troublesome remarks that are sometimes nonetheless made in drafts of comments that reach the STT, before the STT submits the state's final comments. Through an MOU with the Forest Service the STT gets an advance draft (not provided to the public) of draft or final EISs the Forest Service is about to issue, and the STT has badgered the Forest Service to actually remove from an EIS verbal remarks that ADF&G biologists made to Forest Service counterparts or in official ADF&G comments made before STT process became strictly enforced.

Execution of the One-voice policy withholds from Forest Service decision makers, from the Alaskan public and from the Board of Game vital information that was obtained at public expense by the state's own experts, and which should be available to all and subject to public discussion and deliberation. Certainly the governor has a right to his opinion; however, the deliberate suppression of facts and particularly those facts which may expose the administration's political opinion as untenable – that act is unconscionable and in direct conflict with the high obligation of state government under Article VIII of the Alaska Constitution to provide for the common use and sustained yield of wildlife (and fish) resources.

Further, the actions of the STT (including but going beyond execution of the One-voice policy) interferes with the Board of Game's execution of its obligations under Article VIII by assuring that vital information does not enter the public realm and by directly or surreptitiously invoking the Forest Service to commit unjustified, irreparable damage to wildlife habitat – compounding problems being encountered in the state's management of wildlife. Prior Boards of Game have invoked their obligations under Article VIII is resolutions asking for restraint of logging on the Tongass National Forest. We believe it is now time for the Board to invoke those obligations in a new resolution asking both the Governor and the Legislature to terminate both the STT and the One-voice policy, and to eliminate all ADF&G policies that may be construed to limit the freedom of ADF&G biologists to express their professional opinions on habitat, wildlife or related matters on which they have expertise.

*What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say? (Please provide draft regulatory language, if possible.)*

We recommend that the Board of Game adopt and distribute to the governor, the legislature and the news media a resolution with “whereas” statements that express the above facts, problems and constitutional conflicts, concluding with these “resolved” statements:

**Resolved**, that the Board of Game requires the unfettered exchange of knowledge regarding wildlife issues, both in matters before the Board and for the common day-to-day discussion among the populace that may form opinions and comment or testify to the Board, in order that the Board can execute its duties under the Constitution and laws of the state; and

**Resolved**, that therefore the Alaska Board of Game requests the Governor to immediately disband the State Tongass Team (STT), terminate the One-voice policy, and issue a policy that ensures ADF&G biologists can freely – without any restriction – express their professional opinions on wildlife (and fish) matters for which they have expertise, without any pressure to do otherwise or any cause to fear reprisal; and



**Resolved**, that the Alaska Board of Game requests the Legislature to pass legislation that will prevent the executive branch from establishing policies or administrative mechanisms that have effects similar to the STT and the One-voice policy, and which will ensure the above professional rights for ADF&G biologists.

We are disappointed that the board has not included this proposal on either of the January agendas. We do though hope the board will put the matter on an agenda for one of its other 2015 meetings. We encourage the board to do so because this is a matter of high statewide importance. As supporting material we provide as *Attachment 3* a summary of information we have on how the *one-voice* policy has been employed under previous gubernatorial administrations, *Big Problem -- Alaska's 'One-Voice' resource development policy*.<sup>9</sup>

Sincerely,

(Verifiable signatures on request)

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**Attachments:**

- 1. Press release for the 3/14/14 Unit 2 wolf emergency order.**
- 2. Transcript, 2000 BoG deliberation on Region-1 deer objectives**
- 3. Big Problem - Alaska's 'One-Voice' resource development policy (Rev.1)**

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<sup>9</sup> Revision 1, dated November 2014. By Larry Edwards of Greenpeace.



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## **PRESS RELEASE**

*For Immediate Release: March 13, 2014*

**CONTACT: Boyd Porter, Area Management  
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### **Wolf Season to Close in Unit 2**

(Ketchikan) – Biologists with the Alaska Department of Fish and Game announce the impending emergency closure of wolf hunting and trapping seasons in Game Management Unit (Unit) 2, which includes Prince of Wales and a series of small adjacent islands.

Unit 2 currently has a seasonal harvest limit of 60 wolves, which is 30% of the estimated fall wolf population. After several consecutive seasons of low wolf harvests in Unit 2, harvests reached high levels during the current and last year's seasons. This increase is believed to have been due in part to mild winter weather that kept much of the Unit 2 road system snow-free and accessible to trappers and thereby facilitated high trapper participation and effort. With the harvest nearing 60, biologists have been monitoring the harvest closely to ensure the Unit's wolf population is managed for long-term sustainability.

**An Emergency Order (01-01-14) has been issued that closes the wolf trapping and hunting seasons in Unit 2 on Wednesday, 19 March 2014 at 11:59pm.**

All other hunting and trapping seasons in Unit 2 remain unchanged and are not affected by this Emergency Order. Department staff have been in discussions with federal managers, who are implementing a concurrent closure to federal wolf hunting and trapping seasons in Unit 2 as well.

Please call the Ketchikan area office (907) 225-2475 or Craig Area office (907) 826-2561 for more information.

####

<http://www.adfg.alaska.gov/static/applications/webintra/wcnews/2014/orders/01-01-14.pdf>



## ***Transcript of Alaska Board of Game's November 2000 Meeting***

### ***— Portion on Region-1 Deer Population & Harvest Objectives Setting —***

Prepared by Larry Edwards (907-747-7557, ledwards@greenpeace.org)

This is a verbatim transcript.

The people speaking below are:

- From ADF&G: Matt Robus, Matt Kirchhoff, Bruce Denniford, and Jack Whitman.
- Alaska Board of Game Members: Lori Quackenbush (Chair), Greg Roczicha, Mike Fleagl, Greg Streveler, Chip Dennerlein, and Kevin Saxby.

Emphasis used: ALL CAPS means original verbal emphasis. Text in **bold**, underline or *italics* is material that seems important to the preparer of this transcript, in the context of the Board's 2013 deliberations on deer/wolf intensive management in Southeast Alaska.

#### **(Tape 1B)**

Chair: "Staff reports ... We're jumping ahead now to Intensive Management summary, and Matt Robus is gonna give us that, and then we're going to pick up some other things as planes arrive ...

Robus: "... I suggest you look under the IM Findings tab in your board book. There's a Q&A sheet in there you may have seen before, but it's been updated to the present state of the process. ... much of what I have to say is reflected by that Q&A sheet.

"The purpose of this presentation as I understand it is to briefly review the provisions of the intensive management law – it's complicated enough that we need to be reminded from time to time of what it's all about. Secondly, to summarize where the board and the Department is in complying with the law. And then I'd like to talk a bit about why we're working on identifying population and harvest objectives at this meeting. And then finally – and I want to be real frank about this – we have a suggestion as to an extra step to append to the way you were doing things in Fairbanks, in coming up with objectives. So there's a bit of advocacy here in this presentation. And that'll be the final part. (1:40)

"So to summarize the provisions of the law, as you see from your Q&A sheet, AS 16.05.255(e) through (g) directed the Board of Game to adopt regulations providing for the intensification of identified big game populations as necessary to achieve high levels of consumptive use. And there's basically three steps, 3 pieces to that requirement. First, the Board must determine that a moose, caribou or deer population is important for high levels of human consumptive use, which as you all know is a bit different than whether or not a person feels or has an important use of the population. This is kind of bigger than that. Secondly, the Board has to determine that human harvest has been or must be restricted because the wildlife population either has been depleted or has productivity reduced. And thirdly, that improving the population size and productivity is something that's feasible to do using active management methods such as habitat manipulation, um, predator management.

"The way that the Board initially tried to deal with the intensive management law was by considering intensive management requirements every time harvest issues emerged, when you were dealing with regulation proposals or petitions. The Board and the Department realized pretty soon that considering populations in isolation in that way would lead to inconsistencies and kind of a hodge-podge policy. And in addition both the Board and



Department were getting criticized for not tackling the IM issues in a comprehensive fashion. So accordingly the Board adopted the process, working between the Board and the Department we came with a way to go after this. And the decision was to go after it in a stepwise way. The first step would be to identify the populations that met that importance-for-high-levels-of-human-use test. And during the Board cycle, in the four meetings that get around to cover the entire state, the board took time with the Department – between Spring '98 and Fall '99 – to go through that process of identifying which ungulate populations – which of those three species populations – should be considered as important.

"And as you no doubt remember, the four basic criteria you used was harvest with a kind of a threshold amount that was suggested for each species. The accessibility of a population to harvest. The utilization of the population for meat. And the level of hunter demand. If you were to look at 5 AAC 92.108, that's a list of all the populations with positive and negative findings, and you'll notice that the left-hand column is now filled in -the Board has determined whether all these populations are either important or not important for high levels of human consumptive use – and we've got two columns left to fill in. And that's the process you began in the Spring in Fairbanks. (05:00)

"As the Board began dealing with the need to establish population and harvest objectives, which are those other two columns required by the law, you seemed in conversation with the Department to develop a process – or a protocol -on how you went about it. And we support such a process, because we think first of all it's going to enable the Board to do this in a consistent fashion. And then second of all, it enables us when we're talking to the public to be pretty certain we can describe how these objectives are being arrived at. So we support it. (05:39)

"And it also appeared to us that the Board made decisions on objectives -well, not also. Let me describe how we see it as the protocol, first of all. First of all, in cooperation with the Area staff and the Regional staff, the Board review the eight factors on the Objective Management Worksheet, which are the factors required by law that you look at in coming to these objectives. After hearing from the area biologists and asking questions and hearing public testimony and looking at what information had been input to the process – the Board discussed historic population numbers, habitat potential and other factors; and then voted to adopt population objectives. In general we don't disagree with the objectives you picked for populations. (06:33)

"Then thirdly, the Board appeared – in trying to establish harvest objectives – the Board preferred to use 6% of the lower end of the population objective range and 10% of the high end of the population objective range, in order to use a range to be used for harvest objective. And that's kind of the way you did it in areas where we had pretty basic levels of information. In a couple of cases where we were able to provide more detailed information, you chose other more detailed ways of doing it. And that is certainly fine. (07:08)

"So now I want to go into some of the issues we see arising from some of the choices that are being made. We believe the process you used worked very well and was fundamentally sound, subject to a few comments I'll make in a moment. The Board's deliberations were as rigorous as you could expect, given the level of information that we've been able to provide to you. Our expectation at this meeting, if we've read this process correctly, is that you will continue to establish the intensive management population objectives somewhere near the high historic high levels for these populations, in most cases. Or where expert testimony and other information that's submitted indicates is sustainable by habitat. We also expect that you're going to continue to use this rough gauge of 6% to 10% of the low and high ends of the population objective, respectively, as a way to at least start on the road to coming up with the harvest objective. And we expect that for caribou that's probably going to be a similar process. (08:14)



"**Deer is going to be a different situation.** And I'd like to put of the discussion of how we get to deer objectives until we start considering those Region-1 proposals, because their population information is in a different situation than for caribou and moose. (08:27)

"Anyway, assuming that that is the way the Board is going to proceed, **we suggest that you consider adding one step to your process. And that is:** after you've gone through everything you did before, take a look at what we can tell you about hunter demand and harvest level. And use that as a check on where your harvest objective figure ends up. We think this is important, because **if all we do is choose the highest theoretical harvest level, without regard for the current use levels – it has a couple of real consequences.** First of all, we feel that if the harvest objectives are way above what current use patterns are or what use patterns have been in history, the credibility of the process suffers. **And secondly, if harvest objectives are set excessively high, we think a case could be made later on that the difference between the paper harvest objective and the real harvest level – which may be pretty well satisfying the current demand – would constitute depletion. And it would put you and us into all of the complications and obligations that come along with intensive management.** (09:40)

"So we would urge you to set the objectives, that you are required to set, in the context of the current situation, at least in situations where the population seems to be meeting the demand fairly successfully. We don't think these numbers that you find need to be permanent. We kind of envision them being reexamined in subsequent board cycles. **We think that the aim should be to establish reasonable harvest objectives with an expected lifetime of 1 to 2 board cycles.** (10:14)

"We need to remember that the intensive management populations were indentified as important, in the first place, after you considered data on hunter demand for harvestable animals. So there's a case to be made that if you satisfy that demand, maybe with a little bit of cushion for inaccuracy or growth of demand, you're pretty well taking care of the importance that population provides. (10:40)

"**In our view, the goal of intensive management should be** to provide for known or documented needs for moose, caribou and deer for human consumptive use, **not to construct a theoretical goal beyond what can reasonably be expected.** The intensive management statute allows you, the board, to establish the goals you feel proper. And if demand patterns change, objectives can be adjusted when you feel it necessary. (11:06)

"**We don't feel that it's wise to put the Department and the Board into an increasingly – into more and more situations where we are failing to manage according to objectives.** We're already faced with some very difficult challenges in the five areas currently identified as intensive management areas. And if by setting unrealistically high objectives we start moving into more and more areas that are designated that way, we think we are going to take the focus off the areas where we really have some management problems. **And it will also dilute our resources in trying to deal with those problems.** It's not going to be feasible for the Department to manage all habitats everywhere at full throttle all the time. So in a way we're asking you to pick our battles a little bit. (11:58)

"Based on this logic, we recommend that as the Board works through the process to establish the population and harvest objectives, you add a step to where the existing harvest levels and/or hunter demand be considered a ROUGH GUIDE to the appropriate harvest objective. **Hunter demand and hunter harvest level are factors listed in the intensive management regulations as factors to be considered when setting harvest objectives, IF the board feels them relevant.** And we would strongly argue that they are relevant. (12:28)

"For most of the intensive management populations the Board considered during the March meeting, the harvest objectives appear to be consistent with documented demand. By



incorporating a final step where current use levels are examined as an indicator of reasonable harvest objectives, we will be assured that active management is reserved for cases where it is most appropriate.

"And that concludes my presentation." (12:50)

### QUESTIONS & DISCUSSION:

Dennerlein (13:00): "Matt, thanks very much for that. I think that as we get into this – well, thank you for the clear presentation. It helps me to be also clear about where you're giving us some background in fact where, as you say, advocacy from a professional, from the Department's point of view what you would like us to consider in your best judgment. Where you're giving us some advocacy or advice. That helps us consider the two types of information you've given us, and helps the public. I think there is a lot of promise in what you said as we get into this. And experience Mike and I have had on the 19-D-East already shows me that there's a lot of hope and profit for everyone in looking at some of the things that you suggest about that criteria. (14:18)

"If you could repeat what you have written down, your one statement which I think is very helpful for us to consider your view of how intensive management could work. I think you said the goal of intensive management should be to establish reasonable population goals to meet documented and realistic harvest needs, not to create theoretical models – of something. That one sentence, I'd like to write it down. As sort of a term of art I thought it was very well put, to just put us in mind of what the program can achieve.

Robus (14:50): "Thanks miss Chair. Mr. Dennerlein, I'll look for it. It looks like you may have combined a couple of statements there. I believe the passage was, *'In our view the goal of intensive management should be to provide for known or documented needs for moose, caribou and deer for human consumptive use, not to construct a theoretical goal beyond what can reasonably be expected.'*"

Dennerlein (15:20): "That was it. Thank you.

Roczicha (15: 23): "... I'm trying to make one question out of where there's a couple of dozen; certainly difficult. One statement that you have in there. **Certainly we don't want to be setting any false expectations or artificially high levels.** I agree with just about everything you said in that regard. But the one point you did make about trying to get away from any perception of the Department failing to manage. I'm really not sure how to phrase this to make the point, but do you feel it's a perception or an actual practice in some cases where we do have a demonstrated need and actions to address that have not taken place? And do you see that it's then a justified perception by the public – that indeed it's not a perception but indeed that it's a practice of the Department that its not managing in places where it could and should?

Robus (16:32): "Thank you miss Chair. Member Roczicha, it's a complicated question. I think, when I referred to the difficulties we have in the five areas already established, I think maybe that speaks to what you are talking about. When I said that we didn't want to put the Department and the Board into a mode where we were failing in more and more places, **I was strictly referring to if you happen to set false expectations because of very high objectives. It might be theoretically justified but not reflected by what's out there in the field** or necessary to satisfy the amount of demand for that population at the current level. **You would be setting us all up where we are not achieving that paper objective**, and that's what I meant to be saying.

"The rest of your question is a rather difficult one. Obviously in the intensive management areas that are currently identified some potential intensive management things have not



occurred, and different parts of the public perceive that in different ways. I guess that's the way I see it.

Streveler (18:00): "I too will try to find a question in the thicket of my ideas, here at the moment. **This intensive management stuff bedevils me more than anything else this board deals with.** And I am constantly grasping to try to understand how to get away from the ideology and get to the reality of what game management is, in the context of that act. I guess I'll start with a concrete question. Is it the Department's view that what you did in Area 2, setting harvest and population objectives for moose and caribou turned out, on balance, to be unrealistic?"

Robus (18:45): "Thanks, miss Chair. By Area 2, do you mean Region 3?"

Streveler: 2 or 3, really, but both of them.

Robus: "OK. The effort in the Spring, virtually all of the population objectives seem reasonable and justified. Almost all of the harvest objectives turned out that way too. There are a couple that we might want to discuss, if we get to that point. I'm not prepared with the specifics right now, but I could sure talk to you about them.

Streveler: I talked to Dan Reid about this, too, a couple of weeks ago when he put out that really elegant July memo on that subject, which I think you are distilling in your presentation here. He also thought that by and large we had picked a pretty logical way to go about it, but he was concerned that by applying it broadly we may run into the pitfalls you just mentioned, and also suggested we try to do this kind of condition on ourselves.

"I guess then my last question would be: if we do what you and Dan are suggesting, do we end up kind of chasing our tail? Do we make kind of a circular thing out of this? As I understand the spirit of the intensive management act, it's basically to understand what the ecosystem can provide, and then to make some provision for providing it where it's necessary for high levels of human consumptive use. If we simply look at the present levels of harvest, are we living within the spirit of that? I'll leave it at that.

Robus (20:23): "Greg, that's a very perceptive question. And I guess it depends on where in the circle you are going to start. Because as I mentioned, the identification of these populations relied on a gauge of demand – well, now I'm starting to talk circularly. Let me bail out from that and start somewhere else. We're not advocating that you tie this right at whatever number we come up with in Subsistence Division for current use levels. If it looks like there is an opportunity to take more animals than are presently being taken, there's nothing wrong with some sort of addition to current harvest level as a harvest objective. What we want to avoid, though, is some rather optimistic approach to population objective and then just calculating from there a large harvest objective in an area that's not being used ... **[[ END OF TAPE 1B, START OF TAPE 2A ]]** ... subsequent Board cycles to adjust the figures seems to us that being moderately optimistic – or demanding, however you see it – in putting a harvest objective that is somewhere above where we are now, is fine. But let's refrain from getting way, way out there and making it look like we're really under-achieving, when in fact we might be supplying as many animals as people desire out there.

**[[ As note just above; this is now Tape 2A. ]]**

Streveler (00:28): "But just to be sure I understand, but the Department isn't saying that we have to this point got way, way out there very much. That we've tended to be moderate enough to keep the comfort level where it ought to be, mostly?"

Robus (00:40): "Yes, mostly. We'll try to bring up a couple of specific cases that we'd like to pitch our view to you and have you reconsider. But the population objectives look fine and probably achievable sometime. Harvest objectives in general were in the ballpark as far as we're concerned.



(Chair): "OK, I'd like to just summarize what I think I'm hearing here, and you can add or correct me. **I think the synopsis of this is that there are consequences to being too optimistic, in both population objectives and harvest objectives.** And instead of looking at historic harvest levels or the highest level we could possibly think of, we need to think about picking particular ones where the demand is high, so that the efforts to actually reach those objectives won't be diluted, where in every population where we have determined a high level of human consumptive use we're not reaching those objectives and then we'd have to which ones are the most important. So if we do it with population objectives and harvest objectives when we start out, we'll have those priorities pretty much set as we go along, instead of trying to figure out after the fact which ones are really the ones we want to try to achieve.

"So I think I understand what we're trying to deal with here, and I want to remind Board members that we deferred a good portion of the population objectives and harvest objectives from Region 3 to this meeting. So one of the first things we'll be doing is going back to the Interior and looking at moose and caribou population and harvest objectives. And we've got a number of those to finish up before we get into deer in Southeast.

Dennerlein (02:35): "Just one other clarification. I think, Matt [Robus] as I understand it I think you're also suggesting this as, in your words, a sort of check and balance criteria. To put it in context. So it's not a sole criterion, and if you look at the description of intensive management – for example it doesn't happen very often in Alaska, but it happens in wildlife management – and if the law continues and we're inventing management that goes long-term, there are situations where people have (certainly in other parts of the country) suppressed fires for years and years and years. And one of the things you could do, in fact under intensive management, is have habitat restoration and habitat manipulation. And there'd be places where existing harvest someday could be occurring, and you might set a target to achieve and go in and enhance habitat, pro-actively. Your check and balance criteria would not prevent us from recommending anything like that, as I read your statement. It just keeps us from – well, Ted Stevens who has accomplished more things than anyone I know, and he taught me long ago that he called himself the manager of diminished expectations – so that you set something that you hedged your bets to be able to achieve, and you might do better. Is that the sense that your – it's an additional criteria, its a check and balance that wouldn't stop you from case-by-case going in and saying we think – people focus on predator control obviously, but there are other tools in intensive management that could become import – stream restoration and habitat manipulation. There's nothing you've said that would stop us from saying, in this case, let's go pro-actively and try to enhance populations. Am I right in that, in interpreting that in that way?

Robus (04:32): "Thank you, miss Chair. That's correct.

Chair: "Any other questions for Matt? OK, thank you." (04:43).

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### **Tape 20 B** (starting at 40:35)

Chair (Quakenbush presiding): Next I think we have an overview of the intensive management, population objective and harvest objective methods for deer. Is that correct? Bruce Denniford?

Denndiford: Thank you Ms. Chair. That's correct. It might be in way of background, I believe you were provided an RC that includes the intensive management population identification worksheets that we completed two years ago.

Chair: We have worksheets in a tab in our notebook. These are for each of the deer populations; yep, we do have those.



Denniford: Thank you, Ms. Chair. Then what I would like to first do, before I invite Matt Kirchhoff to walk you through the procedure we have used for coming up with the harvest and population objectives, I could point out just briefly – run over for Unit 4 what we did prior to the Fall '98 Board of Game meeting. We reviewed the populations. The Board found that 5 deer populations throughout the region were found important for providing high levels of human consumptive use. We used either '91 through '96 or '91 through '97 averages to provide you with an estimated average of harvest for those populations. And there will be some slight differences in numbers that we will explain to you, not that those numbers are not still good for those years. When Matt describes his technique, there was a slight different range of years used to come up with our estimates. That may take a little more explanation, but at this time I think it would be good to have Matt come up and to review his work. When he gets going, I'll put up the overhead which shows the population estimates and harvest – population objectives, pardon me – that Matt will be addressing. And you were also provided a copy of Matt's paper that he is going to be talking from, which has the title "*Establishing Deer Harvest and Population Objectives in Southeast Alaska.*"

Chair: It looks like that's Record Copy number 3, for board members. Go ahead, Matt, whenever you're ready.

Matt Kirchhoff: Thank you Ms. Chair and Board. This is a difficult job, and I volunteered to take a stab at it. And the approach that I proposed for the harvest objectives and population objectives is the same for each of the five populations in Southeast that we're dealing with. We'll work with Unit 4 initially here, but just keep in mind that in this basic process some of the assumptions are very similar, as we work through it.

One of the big differences for Southeast Alaska compared to some of the Interior populations that you've done this with is that we have a much more difficult time surveying the wildlife populations we have, given the forest cover. It's virtually impossible through aerial surveys to determine what the population size is over large areas, areas the size of these GMUs. What we do instead, is we have teams of people go out in the field each Spring on the ground, and in a very small, limited area run transects up the hillsides. And they can determine the relative densities of deer by determining the density of fecal pellet groups. And there's some conversion factors we use to come up with the relative density of deer. But you need to understand it's very difficult to extrapolate those very small samples over areas the size of the GMU. So, the number of deer we have out there at any point in time is really quite speculative and hard to come up with.

So what we decided to do in Southeast is to approach it from the other side, and look at the harvest that currently is taking place on the ground. And really we have some pretty good deer harvest information, and I think a pretty quality deer hunt that is provided to the residents of Southeast. Last year for example, there were 7,785 hunters. 60% of those hunters were successful, harvesting 11,000 deer. That works out to an average number of deer per hunter of 1.4. That's the regionwide totals. That overhead, you can see some of the statistics for the individual game management units in Southeast.

This is Table 1. Up at the the we've got deer killed, deer per hunter, days per deer, and percent successful. Unit 1 of course is on the mainland. There's a lot more snow on the mainland; deer populations are relatively low, and hunter success and number of deer are generally low on the mainland. Unit 1C has a few small islands away from the mainland included in it, and that's where most of the [Unit 1] harvest takes place.

But Units 2, 3 and 4 are basically the islands of Southeast Alaska. These are the areas that produce most of the deer.

So looking at that we said, what is the reasonable objective for deer harvest in Southeast Alaska, and we decided we don't want to slip from what we're seeing right now. We'd like to,



if anything, increase the number of deer. Our objective is to have more deer harvested than we are harvesting right now.

So what I did is I took the number of annual harvest from 1994 to 1998, so some relatively high years included in that five year period, [and] looked at the annual average harvest for GMU 4 in this case, 7,422 deer. If you look at the bottom line in Table 2, that's the number I'm reading. And the harvest objective, then, is 5% higher than that annual harvest. So, in all cases, for every GMU, for every population, our harvest objective is the average annual harvest [ -- tape change -- ]

### **Tape 21 A**

[ Note: See the above mentioned report in RC-3 regarding content that may have been lost during the tape change.]

Kirchhoff (00:00): "... excuse me, a reasonable target. So 33% of that deer population can be lost to mortality in any given year. Mortality comes in a variety of different forms. There's of course the reported harvest that we have in the table there, Table 2. There's a certain amount of unreported harvest as well. And you can see in the bottom table, Table 3, that second column is the percent of unreported harvest that the area biologists felt appropriate for those GMUs. So if we take the reported harvest, increase it by the percentage of unreported harvest, we get the total of hunting loss, in column 3. The other components of mortality are predation loss and starvation loss. Of course in GMU-4 there are no wolves and there are no black bears, so predation is relatively small, but starvation loss is relatively high because the deer populations in Unit 4 are near carrying capacity. So most of the deer that die in Unit 4 die as a result of starvation over the winter.

"If we add up all of those sources of mortality and we assume that that represents 33% of the population, what then is the population that we need to have out there? And that then becomes the population objective in the last column in that table. OK. So it's a very simple mathematical process of working through this in estimating harvest, unreported harvest, predation loss, starvation loss – and then if that total mortality represents no more than 33% of the population, what population is necessary to sustain it. And that's how we came up with the population objective. (01:33)

"That in a nutshell is how we did it. And I can entertain questions on Unit 4 with Jack's help, or we can deal with the whole Region. (01:44)

Dennerlein (01:47): "Thank you, thanks. You guys are great. One question on the brown bear in Unit 4, are primarily salmon the reason, but how tied is -if we are looking at systems – Matt, do you have a sense of emergence of bears in the Spring and whether they're estivating, not hibernating. If deer are healthy and there's a high winter kill, how important is the protein carcass? How important is, in fact, keeping a healthy deer herd to keeping a healthy bear population in terms of seasonal food source? If predation isn't very high, is the value of winter-kill carcasses important?"

Kirchhoff (03:02): "I like to ask Jack to answer that. I've got an opinion, but Jack probably has a better handle on it."

Whitman (03:04): "A lot of that is extremely speculative, I think, on our parts. The first year we were in Sitka we had a relatively high winter kill; it's probably the highest snow accumulation we've had in many, many, many years; probably 30 years. So deer mortality was fairly extensive. We didn't lose a high proportion of the population because the habitat was in good shape, but I did see following that relatively high winter kill, I did see a very high incidence of scavenging by brown bears on deer. Again, you're question of whether or not that is important to brown bears, I think brown bear populations are going to vary greatly depending on long-term health of the fish populations. I don't think deer – certainly



predation does occur and scavenging of winter kill carcasses, or hunter-killed carcasses – it certainly is important to individual bears. But I don't think I would characterize it overall as not driving the bear population. In other words, if we don't have deer or if deer numbers go down due to a severe winter, I seriously doubt that it will affect the bear populations very much.

????? (04:53): "You'll probably just end up certain years with bears with deer-guts."  
(Laughter)

Kim Titus (04:54): "I just completed some work with Marav Ben-David on long-term bear diet, using stable isotope work. And deer was modeled as part of that stable isotope work we did, and they compose less than 1% of the annual diet. And salmon varied a lot in the deer diets, and it's a very complex relationship. But needless to say we specifically looked for deer in the blood and hair, in the work that was done but basically could hardly find it.

Roczicha (05:25): "My question was partly addressed. Just wondering how you factored in the fairly substantial die-off from '98 into this whole equation; if it was given an special consideration at all?"

Bruce Denniford (05:50): "Through the Chair. Greg if I understand your question correctly, you're asking if the work that Matt presented took into consideration the rough winter of 1998?" (A: "Correct, yes.") "Actually, the winter of 1998 would not be reflected in the harvest data. For the Table 2 there you can see the mean harvest was 1994 through 1998. If you'll look at the Table 1, though, you can see just for example that in GMU-4 the number of deer killed in 1999 was 6,762. That compares with the five-year average of 7,422. So that hard winter caused a decline in the harvest of 1999. I used data for the period '94 through '98 to come up with the harvest objective, so it did not include that hard winter.

Roczicha (06:45): "One more just for looking at numbers for awhile; things like this just jump at 'ya. When you were explaining your standard formula I didn't really get it. When you have GMU-1C and 4, hunting and predation loss are given the exact same numbers, and then the starvation loss is exactly double that. Just curious how those came about.

Denniford (07:18): "You're getting some good questions there Mr. Roczicha. I had to make some assumptions about predation loss and starvation loss. In areas where you have wolves and black bears as significant predators on deer, I simply assumed that predation loss was three-times the hunting loss. In areas where we do not have black bears and wolves, for example Unit-4 and Unit-1C on the islands, I assumed that the starvation loss was three-times the hunting loss, and that the predation loss was equal to the hunting loss. So it was either a three-fold increase or a one-fold increase, depending on whether predators were present or absent.

Fleagle (07:54): "I know we've wrestled with Southeast populations when we went through this exercise to find these populations necessary for high-level harvest and some – not deer – but some of the moose populations were pretty close but didn't make it. Because of habitat, and what can you do to regulate these populations. Now, the question relates to that. **You're talking about taking the average population and increasing that by 5%. What kind of management tools do you have to do that in Southeast?** I mean, I don't see fire as an option. I don't see predator control, really. But, what are your options?"

Denniford (08:58): "Thank you, miss Chair. That's a really good question. The fact, as you well understand, is that [Sitka black-tailed deer depend upon old-growth forest](#) for their maintenance and particularly for winter habitats. And [maintaining that habitat](#) has been kind of the direction that many of our research questions have led us to. [It's one of the single most important things that we can do.](#) **I almost hesitate to mention that 25, 30 years ago there was some efforts to reduce wolf numbers in parts of the region that met with failure.** Now, I can't address to what to degree those efforts were carried out,



whether it was a large budget, I believe it was pretty much a very small try. But not very many animals were taken, not very many wolves were taken. **Any type of habitat management; there's nothing we can do for this climax species of deer to change the habitat that would enhance their benefit.** There is some short term benefit when habitat is altered for some summer foraging, as the clearcuts come up into browse. But that benefit is lost during the winter months when it's covered in snow. Matt has done a lot of research on that and could address it a lot better than I could.

Kirchhoff (10:38): "To address the question of the 5% increase. There's enough deer out there. I mean we're not limited; the percentage of deer that we're harvesting is not affecting the deer populations out there. The way we could try to get 5% more deer harvested might be for example to try to get more information to hunters; to encourage more hunting; to basically publicize the opportunity a little more. And that might result in increased harvest. But for the most part, a lot of these harvest numbers are driven by opportunity, and if we get a winter where deer are driven down to the beach, we get an increase in the harvest. If we get a winter where the weather is really poor and the people can't get out in boats, and the deer are distributed widely in the forest because the snow isn't deep, it generally results in a lower number. So, the 5% really is somewhat arbitrary. It just signals that we would like to continue to improve the hunting opportunities in most of those GMUs in Southeast.

Streveler (11:35): (passed)

Fleagle (11:40): "Thank you Ms. Chair. OK, thank you. I understand the 5%. I was applying that to populations, and I didn't know how you could do that. But in rereading your RC3 there, I do see that harvest and that your objective is to maintain sufficient numbers of deer in a population. So that, I guess – doing that through methods and means and season lengths and what not. So I do see that this 5% is achievable. I just was curious how you were going to do that to the population, and I was misled so the question really didn't apply. Thank you.

Streveler (12:21): "A couple of questions about predation, Matt. When a person looks at the pattern of deer densities in Southeast, it would appear that the more northerly islands where, on the face of it, if it were habitat limited you'd expect lower deer densities where the deer are high. And then in southern Southeast where you've got better winter conditions but wolves, that deer tend to average lower. And especially in Unit-3 they're quite low now. Do you draw the same conclusion I do, that that suggests predation limitation?"

Kirchhoff (12:55): "Yes, I believe in most of the islands on the southern half of the archipelago, south of Frederick Sound, predators are keeping deer at lower numbers than they would be otherwise. It's a combination of habitat and predation, but predation certainly plays the major part.

Streveler (13:15): "Yeh, I heard your answer, both implied and otherwise, that probably not withstanding that answer, **we don't have many tools to deal with predation here. So from the standpoint of intensive management, it's kind of a non-question in your mind, in the predator equation?**

Kirchhoff (13:40): ***"I don't know of any technique that could be used to reduce predators, aside from liberalizing seasons and bag limits. No active management that I am aware of that could be applied."***

Dennerlein (13:55): "I'd just like to follow this for one second, because this may be my first meeting but this is an interesting case. It's a good presentation. I think we've got a good population and we're maintaining opportunity. But maybe we also need a chance for education, because the letter that we got from Senator Kelly made a pretty blanket statement that none of your Department's targets are acceptable, and that the intent of the law was to set populations at or near historic highs. This seems to be a situation where, following up



Greg's comments on intensive management, some of the conditions have changed as in large-scale clearcut loss of old-growth. But also, where there is predation black bears are gonna be involved. And I think we're going to hear that one of the issues is trying to sustain black bears. So it would be sort of a box to go out and hammer under one sort of management, the population we're trying to hold onto under the next briefing. And I don't know if there are other tools. I'm curious though – I mean it's responsible to do what you're trying to do to keep things healthy. Maybe we need a good way to explain that in some legitimate situations like we're here talking about. And/or, the only other thing I can think of is fisheries management, which gets us – I mean I'm not advocating this, but are there cases where we would ever want to, over time, figure out some specific stream returns and adjust an optimum sustained yield to target greater return of the resource, work with the department of fisheries. I mean, those are the only things I can think of doing is predation, which is mostly bears. Maybe try to get a 40% instead of a 30% return for nutrient to build up a population. Any observations or comments?

Kirchhoff (17:00): "Just a couple of comments, Chip. Black bears and wolves are both present, and they are both significant predators. We have a better idea of the effect of wolves on deer than we do of the effect of the black bears, because we do have the benefit of some wolf research over the last six years. And the person responsible for that is here if you have some specific questions. Black bears are a little bit more uncertain. They certainly take a lot of neonate fawns, in the Spring, early Summer. But we're really not sure just what the extent of that is. But you are absolutely correct. We do have a bit of a box we are in, because you have the Alexander Archipelago wolf which several years ago came close to getting listed, and the black bear which we obviously have some concerns about because of the harvesting trends that we see. So currently we are more concerned about those predator populations, frankly, than we are about the deer. There really are more than adequate deer out there now to meet the demand of hunters. And so our deer population objectives are not the maximum that could be sustained under perfect conditions, because they are what we feel is necessary to meet reasonable human expectation or desire but not the maximum the habitat could support if there were no predators out there.

Roczicha (18:20): "Matt, back to your tables. I'm curious how you arrived at the number of deer per hunter and the days it took 'em to get 'em, percent that were successful and so forth, when down in Table 3 it says 100% of the catch is unreported.

Kirchhoff (18:47): "The data in Table 1 reporting the harvest statistics -deer killed, deer per hunter and so on – those are just selected statistics, but they're the result of the Divisional deer hunter survey that we send out to our harvest ticket holders. It's our own survey. We know that a lot of people that harvest deer in Southeast Alaska don't necessarily respond to our survey, or don't answer honestly, or don't necessarily even get a license or use the harvest tickets. We know this from some of the work Subsistence Division has done by going into the communities and doing interviews with heads of households, and we have compared some of their numbers with our numbers and know there is a lot of disparity. Perhaps Mike (Turek) could address that a little more specifically. The numbers I've looked at, there hasn't been any really clear trend between the two surveys. In some cases they're two to three times higher on the Subsistence end, sometimes they're a little lower on the Subsistence end. What I've plugged in there are not hard numbers, looking at those two surveys but simply the estimates that the area biologists made mostly based on qualitative discussions that they had with their hunters in those areas.

Fleagle (20:05): "But you don't receive any responses from Unit-2 whatsoever? It's 100%?

Kirchhoff (20:11): "No. What that means is that if the reported harvest is 1,000 deer, the actual harvest is 2,000 deer. We're missing 100% of the [reported] harvest. So we're doubling the hunting [unintelligible].



Streveler (20:30): "Matt, to follow up a little bit on that predation question. On Prince of Wales we've got lots of road hunting, and we've got that federal subsistence season now, which some people find pretty problematic. Notwithstanding all that, do you still think that non-human predation is basically limiting there, and that human predation is not having a significant effect on the deer population?"

Kirchhoff (21:00): "I can't answer that for certain. I think Prince of Wales, because there's 8,000 people living on Prince of Wales, there's probably a dozen or two small communities on there and it's a very active hunting place, a lot of people hunting all the time there. There are probably localized pockets where the population is limited by hunting; I would say within a couple of drainages or a VCU, where the hunting is having a noticeable effect. Certainly along the road corridors that's probably true. But over GMU-2 as a whole, I think there's enough habitat, enough surplus deer out there, that the hunting over that entire GMU-2 area is probably not limiting the deer population.

Dennerlein (21:55): "Since Southeast deer is an IM population, I guess -and maybe this would be helpful, maybe we could say it - but if I'm listening to everything here. ... See if this makes sense, to my colleagues too. **It sounds like the intensive management plan is to gather better and as good a data as you can**, to know more about some of these estimates and questions. And really I guess you're protecting what you're saying is some key predator populations for a basic level of healthy systems, complying with US law, sustaining hunter opportunity on those populations. And then maintaining what seems to be a currently healthy and productive deer population, and a significant harvest over long-term, that really the intensive management is to know more as you can about the pieces of the system. So what we have now is a pretty good deal, is I think what we're saying - and it's going to take some intensity to keep getting a good deal. Am I getting that right?"

Kirchhoff (23:14): "Yes, you are. I think that's a good characterization of it. **There are some assumptions that we use in getting these numbers that are pretty squishy**. And we do intend to try to firm those up. But I think you characterized it very well.

[[ Blank spot in my copy of the tape - hit record on accident. ]]

Chair (23:55): "OK, well we'll find out pretty quickly.

Roczicha (23:58): "Move to adopt Proposal 33 to adopt intensive management.

Chair (24:00): "No, no. I don't think we want to start with 33. [Pause, mics off.] Let's try again. Greg Roczicha.

Roczicha (24:22): "I move the Board find the population objective for deer in Unit-4 be 124,825 and the harvest objective be 7,793.

Streveler: Second.

Chair (24:39): "So Matt, are you going to take us through this, or will Jack? Uh, Bruce Denniford?"

Denniford (24:44): "Ms. Chair, I apologize; I kind of lost my place here.

Chair: We're prepared to go through the worksheet for population objective and harvest objective for deer in Unit-4.

Denniford (25:15): "Ms. Chair, I'm prepared to take you through the Intensive Management Population Identification Worksheet.

Chair: OK, we've already identified the population as a population for high human consumptive use, but that wouldn't necessarily be a bad way to get to the harvest objective and the population objective. So I think that's fine; we're on the worksheets.



Denniford (25:45): "Yes, Ms. Chair. I can start with the objective worksheet or backtrack and start with what we did two years ago on the population identification worksheet. I just wasn't clear how you wish to proceed.

Chair: Well, we know that two years ago we already found that this population was important for high levels of human consumptive use. Now what we're looking for is establishing the population objective and the harvest objective. Some of that information probably will be a review, but we're not looking to – we've already found that it is important for high level.

Denniford (26:20): "Thank you Ms. Chair. With that, I'll take you through the eight criteria on the Management Objective Worksheet.

[1] "First is effects of weather, habitat capability, and diseases and parasites, for Unit-4. Diseases and parasites appear to have a negligible impact on deer populations in Unit-4. Severe winter weather causes periodic declines in the deer population, especially in areas where clearcut logging has removed old-growth forests. Among other deleterious effects, removal of old-growth canopy allows snow accumulation on the ground above normal levels, limiting the value of critical habitat to support over-wintering deer populations. (27:20)

[2] "Number 2 is the maintenance of predator populations. Brown bear predation on deer is apparently negligible. Anecdotal evidence supports the idea that scavenging deer carcasses by brown bear, marten and bald eagle may provide periodic food resources, but is probably not important for maintaining these populations. (27:18)

[3] "The third criterion is maintenance of habitat conditions suitable for other species in the area. Deer and mountain goats compete for limited food resources in some limited situations. However, for current deer and goat populations levels in Unit-4 there appears to be no direct correlation in terms of population densities. (27:30)

[4] "The effects upon subsistence users. Subsistence use of deer in Unit-4 appears to depend largely upon deer abundance. As deer number increase following mild winters, hunter effort increases proportionately. Deer meat provides the bulk of the red meat for consumption by Unit-4 residents, as the only other available ungulate is mountain goat.

[5] "Cost, feasibility and potential effectiveness of possible management actions. With the notable exception of ensuring the maintenance of old-growth forest, little can be done to increase deer densities in Southeast Alaska. ADF&G needs to continue working with the Forest Service and Native corporation land managers in an effort to maintain quality habitat. Where logging occurs it is imperative that proliferating human access be minimized by strict attention to road placement and administrative or mechanical road closures after logging, and regulations that assure viable deer populations. (28:23)

[6] "Land ownership patterns within the range of the population. The vast majority of deer habitat in Unit-4 is under federal jurisdiction of the Tongass National Forest. In addition, a large portion of Admiralty Island is designated as Admiralty National Monument, within the Tongass.

[7] "And accessibility, the degree thereof. Accessibility by boat is very good throughout the area. The only areas largely inaccessible are interior portions of the major islands, where deer habitat is limited because of high elevations and snow and ice cover.

[8] "And finally, Other Factors. Since 1990 both state and federal subsistence hunting regulations have been in effect. The state regulations were adopted by the Alaska Board of Game and apply to all lands in Unit-4. The Federal Subsistence Board promulgated regulations that apply only on federal lands, and give federally qualified subsistence hunters more liberal season dates and bag limits. While the two sets of regulations were initially quite similar, they have continued to diverge. (29:19)



And as shown on the screen, the Department recommended objectives for the population objective for 124,825 and a harvest of 7,793.

Chair (29:34): "Thank you, Bruce. In looking at what the estimated average harvest was for '91 through '96, it's quite a bit higher than the harvest objective. And so is the maximum harvest for any three years; and those years were in the '80s. I guess I would just like somebody to address the harvest objective being lower than either of those numbers.

Kirchhoff (30:02): "Yeh, I believe the difference you're citing reflects higher harvest in the late '80s and early '90s than we've seen recently. It has largely to do with winter weather. So again, this is what Bruce referenced earlier, depending on the five-year window that you look at you'll come up with slightly different numbers. We took the '94 through '98 period as what we thought reasonable, given that we are going to be moving from this point forward. We didn't want to go back too far in time to calculate our average annual harvest.

Roczicha (30:4): "Madam Chair, I can't see any reason not to support the Department's recommendation in this case. All indications that I can find, from what I've heard both provided by the department and from other sources is that as the population as it's set could readily sustain a much higher harvest. And certainly there's a great deal of effort out there. No one is preempted from essentially going out and harvesting as many deer as they could possibly need, and still the surplus is not being approached. So in this case I think that's a very generous and fortunate situation, and I will vote for these findings.

Fleagle (31:33): "I do too, generally. I've got one concern that may not be a concern, but I'd like to just throw it out. We consistently, in passing these objectives, have been giving a scale; a high and a low number, to allow for variances in whatever happens. And here in 1999 you have a number of 1,662, which ain't gonna meet this objective. And I'm not sure what that means, if that triggers intensive management. But, or what exactly that, if we fall below our objective, and obviously we're well below in most places. We're using it as a goal. But I'm wondering if we're already there, and we've fallen below. I don't know what that means. I think maybe in just being consistent I'd be a little more comfortable giving a range; you know, 6,500 to 7,800. But I just throw that out for an idea. It looks like there's lots of fingers pointing at me.

Matt Robus (32:37): "Thank you Ms. Chair. This very topic came up in the conversation when we tried to decide how to present our IM objectives for deer. The ranges you saw for the interior populations were largely the result of population estimates that had a range to them. And then as you carry through the process you ended up with a range for both population objective and harvest objective. In a situation like this where we're starting out without a population estimate and nothing more than the trend information from the pellet surveys, and everything was calculated according to the assumptions that Matt has laid out for you, we decided we can adjust 5% below or 5% above, or whatever you want to use a range. But we wanted to be clear that this is entirely a calculated set of figures you're looking at, and it's just a point that results from a calculation. Any sort of range you put around it is going to be entirely constructed and arbitrary. So we felt that the Board should know that, and if you wish a range we can certainly put one in there.

Streveler (34:00): "Just sitting here thinking about this. **It seems to me that if we haven't discovered any tool in the near future for tweaking the population one way or the other**, the population objective is more just a number out there for us to be cognizant of in its general magnitude. It seems to me that the only number worth serious consideration is the harvest objective, because that is based on some actual experience. **And in my mind the most important question there is thinking through Matt's fudge factor of 5%, and deciding if that's the kind of signal we want to give.** I can't see much point in chewing on the population figure, since it's a calculated artifact basically.



Chair (34:52): "Along that line, **the only thing that I might suggest is make it a nice round number**, so people are automatically suspicious that it doesn't include some kind of accuracy that isn't really there. So the rounder the better, in that case I think.

Fleagle (35:29): "One other question I have is – you may have covered this, I may have missed it – you have a maximum average for any three consecutive years of 13,400. And then the estimated average for a six year period – '91 to '96 – is 9,020 deer. During those highs, did you say we are at or near carrying capacity, during those highs? Was there nutritional stress in the deer? Were those not achievable? I'm not sure where I'm going with this, but this is the first time we're sitting down to one of these objectives in the south, and I don't know much about deer personally. But I know the intensive management law is intended to try to make more big game animals available to hunters. And I'm not sure that I'm really comfortable – number one – with just a set number. Because we've got a range of harvest from the past that go ALL OVER the place. **We're down to 6,500 and we're up to 13,400, and we're just setting a number. And it may be too high; it may be too low, depending on the environmental factors or whatever. So I guess, what accounted for those real high harvests? And are they achievable?**

Kirchhoff (37:12): "That's a good question, Mike. If you recall back to Jack's chart of the annual harvest, there's a lot of variation year-to-year and it doesn't always reflect what the deer population is doing. Sometimes the snow or water conditions are right so that the harvest is inordinately high. In general the deer population in Unit-4 has stayed stable. Maybe it's down a little bit from peak years in 1991. But we do expect to see that kind of annual variation in the harvest. **I think putting a range on it would be a reasonable thing to do.** We could easily do that; look at the high and the low for any five year period and say we want to manage inside those limits – that would certainly be easy enough to do. I guess that's up to you, in terms of how you'd like that presented – we could do it that way if you like.

Fleagle (38:05): "Well, I don't know where to go with it; I'm just throwing it out to the Board. But it's just that we are breaking from consistency. But maybe it may be appropriate. We've got a brand new region with a brand new species. Maybe it's appropriate. I don't know; to me it's not the same as we've been doing, when we've got these numbers of harvests that just jump all over. And how do you pick what's your harvest objective. And is it meeting hunter demand?

Streveler (38:38): (Passed)

Dennerlein (38:44): "I think Mike raises a very good point. I think it's important to discuss this in the record when we're doing this. I would ask Matt how you feel about it. I think I'm comfortable with the range Mike talks about that sort of consistence, with somewhat of a range. Maybe some notation; write in the finding of what the range means; the confidence factor. I suspect that part of the management, intensive or otherwise, we're going to need to do here is collect information; as good or best as we can. So some indication of the data confidence or needs. Beyond that, I'm probably going to have to defer or ask my colleague Mr. Streveler to correct me, but I think it is very different, Mike. In short there are years when there may be a ton of deer; it's just that it never snowed, the weather's great, and they're all at the top of the mountain. There may be a year when there's not many deer, but the snow came real early and you could get your limit off the beach or walking into the first meadow. I mean, Southeast is highly – because the whole name of the game is elevations from sea level. It's a night and day difference, and having lived here and hunted deer I can see what Matt's talking about. I mean, you may have to spend all day getting to the top, and then there they are. Or they might be on the beach in the same month, and if it happens to be a month when the weather's OK for your skiff, you're right there. And if they come down later when the weather is tougher, access is really weather and snow dependent. Maybe



Greg can speak to it. But if that's true, then I think a RANGE for consistency is good. But a little departure in this coastal region for stepping out as we begin this longer program.

Whitman (49:07): "I think member Dennerlein really has summed it up. ***I'm becoming more and more and more uncomfortable as this discussion continues, about your expectations when we come either to a number or a range of numbers.***

**"1979 – I should have perhaps put this up earlier – we had an estimated total deer harvest in Unit-4 of 1,000 animals. In 1987 that number was 16,000. The deer populations in Unit-4 are extremely variable, based on weather. You guys are powerful, but I don't think you can affect the way the weather affects the deer populations. I don't want to give you the false impression that if we put a number on there – that's a target that we may not be able to meet very often, because of vagaries of weather.**

Streveler (42:18): "I'd be interested in Kevin's view of what I have to say, but it seems to me – if I understand the intensive management act right – it was framed for conditions that are totally different than Southeast Alaska. And usually what you want a range of harvest objectives for is because you want to know when you are getting into the red line and you want to take action. Well for the short-range future, which Kevin has advised us before is what we're dealing with here – **we haven't identified any range of actions to change the population size. So I don't think it matters.** Consequently, looking at harvest information the argument is somewhat different, in that we do have some real numbers there. **We can affect the harvest or season bag limit – we can do that.** There are times we want to reduce it because we want to give the deer a break. There are also times when predation nails them like it has around Petersburg, and we cut back. So we do have some management discretion on the harvest. **So I see your point on focusing on the harvest and giving ourselves a range there, and acting like we used to do in intensive management. But on the population objective it doesn't seem to matter; it doesn't seem to fit the paradigm for intensive management.**

Chair (42:31): "Along those lines, Greg, I was thinking what the trigger is, is the Board having to do a reduction in a season or bag limit. That's what triggers into intensive management. So if we can look at the history of what the harvest has been, like in 1979 when there was only a thousand deer [taken], did we need to cut back on season and bag limits in the following year or the next cycle or anything like that? Or was that what's within what's expected for this population? **That's the trigger. The trigger is having to reduce the season or bag. If that's not part of it, we don't get ourselves into IM.**

"The other thing we could do, is do something. Because of the variability in this, don't recommend that there is a trigger unless you've got a three-year average of something much lower. Or a five-year average of something much lower. So, don't let a trigger be a one-year harvest. And allow for flexibility. Or that variability.

Kevin Saxby (45:02): "Madam Chair, the Board has already anticipated some of these quandaries, and recognized ... **[[ END of TAPE 21A; START OF TAPE 21B. ]]**

### **Tape 21-B**

Saxby (continuing from above, at 00:00): "... taking – any reduction in taking that continues to allow a level of harvest equal to or greater than the minimum harvest objective established by the Board, assuming that there was a minimum harvest objective, or any reduction that is intended or expected to be of a short term and temporary nature and is necessary for the conservation of the population. So you've anticipated some of these problems, and like with deer that that would not infrequently happen.

Chair (00:38): "And the other thing is, even with that trigger, if we were asked to decrease seasons or bag limits because of a low harvest, intensive management law says if it's

**impractical or if there's nothing you can do that will then increase that – if it's weather or whatever – we don't have to implement an intensive management regime. Or if it's not feasible.** So it really – this isn't really – **this range or this number isn't necessarily something that's going to get us into trouble there.** We can – **deer are definitely different.**<sup>1</sup>

Dennerlein (01:30): "I maybe I would suggest – I'm compelled by Greg's comment about how much difference it makes. Maybe, if this sounds good, **I would round-off these numbers and put some notation and just leave the numbers so we can revisit them.** And make it easy, I don't know what number you would feel comfortable with so 7,800 and on population, you know, twelve-four-eight-hundred and 7,800 for harvest. Just round off the numbers and make ... OK, I'll move to make as an amendment that the population be twelve-forty-eight-hundred and seventy-eight-hundred harvest.

Second.

Dennerlein. "One, two, four, eight, zero, zero. I'm just taking the numbers and making them simple. One's rounded by seven, one's down by ...

Chair (02:57): "You're going to have to repeat your amendment. **Make them round, really, really round.**

Dennerlein (03:03): "1-2-5-zero-zero-zero population, and 7-8-zero-zero harvest.

Chair (03:20): "OK, the amendment is population objective 125,000 and harvest objective 7,800.

Fleagle (03:53): "Well, I don't know. I still have a concern with just having one number, and we've got a range of harvest going from 1,000 to 13,000. But I don't see plugging in 1,000 to 13,000 either. So, I don't know. **I suppose for a trial; get this thing into the regulation and try it** and see what these guys come up with for what harvests are running at and what populations might be estimated at – **and maybe see where it goes from there.** I guess I'll support it, you know, if everybody is comfortable with it, but just kind of with those reservations. **We'll just have to see where it goes.**

"I wonder, I was just looking in the regulations, and unfortunately deer do qualify as a big game species. But I was just wondering if we could throw deer right out of the equation." (Background chatter. "Yeh."). "Can we?"

Chair (04:56): "Mike, just to give you an idea, these numbers are going to become part of a big deer proposal that we are going to vote on again. So even without reconsideration we can amend; we can change our minds and decide what we want and do something different. There will be another opportunity within this meeting. So it doesn't seem unreasonable to throw something out there and try it and see what happens."

Dennerlein (05:20): "Thank you, and thank you Mike. I'll just be real brief. If I can give any confidence in what I mean by the spirit of this, is that if we were in a real problem right now I'd probably be continuing to try to tweak and figure something out, but I think for getting this on the books and getting started here, I think it's reasonable. But basically in Southeast, we've got a pretty good thing going, and we've got some good positive things going forward with the brown bear management team. If we weren't having an opportunity for people to get out and hunt I might feel differently. But I think trying this, since we don't have the confidence of range, and getting it on the books and seeing what they can do. You

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<sup>1</sup> This is a reference to setting objectives up north for moose and caribou, where better data is available and there is less volatility in the populations. This theme, about Southeast deer being different and not fitting the paradigm of the intensive management law, recurred during the meeting.



know, we've got a good thing going and I don't think we're hurting anything; **and that's why I was willing to try *this test*.**

Streveler (06:18): "Lori, the more I think about it, the more I think it's a tempest in a teapot. We've got – I'd say just pass this. **Because look at what would happen now if we reached the point where we tried to – where something was triggered.** Let's just pick a number, and say we get below it so we have to consider the population depleted. **Well, we go through that exercise**, on deciding what we do. ***And as I run that exercise through my mind, we're going to decide we can't do anything.*** [ *Prolonged laughter from others.* ] "So, the only real thing we've done here is that 5% thing, where we're saying we're going to try to buck-up the harvest a little bit through making opportunities more widely known or more available. That's the only real part of what we're talking about. **So I would say, to meet the requirements of what we're doing, which is at this moment not highly meaningful, just go ahead and round them off, put them in**, and cite the part that is meaningful **and go on**.

Chair (07:15): "We have before us an amendment to change the population objective to 125,000 and harvest objective 7,800. Question is called on the amendment." [ Passed 7-0. ]

Chair (07:43): "We have before us the main motion as amended, and it's remarkably similar to the amendment." [Repeats the numbers.] "Further discussion on the main motion as amended?" [Question. Passed 7-0. ]

Chair (08:27): "We made it through the Sitka deer population, and Ketchikan is next. [Break taken.]

Chair (09:07): "The Board of Game is back in session at ten minutes after 5. And we're going to do deer population objective for 1-A next, is that right?"

Roczicha (09:20): "Madam Chair, I move the Board find that the population objectives for deer in Unit 1A be 14,781, the harvest objective be 725.

Second.

Denniford (09:34): "Thank you Ms. Chair.

[1] "For deer in Unit-1A the effects of weather, habitat capability diseases and parasites. Diseases and parasites appear to have negligible effects on deer in Unit-1A. Severe winter weather causes periodic declines in the deer population, especially in areas where clearcut logging has removed old-growth forests. Among other deleterious effects, removal of the old-growth canopy allows snow accumulation on the ground above normal levels, limiting the value of critical habitats to support over-wintering deer populations.

[2] "Maintenance of viable predator populations. Brown bear predation on deer is apparently negligible. We believe that black bear predation on deer is significant where they occur at high densities. Anecdotal evidence supports the idea that scavenging of deer carcasses by brown bears, marten and bald eagles may provide periodic food resources, but is probably not important for maintaining these populations. Deer are the mainstay of wolves in this unit.

[3] "Maintenance of habitat suitable for other species in the area. Evidence suggests that deer and mountain goats may compete for food resources in some limited situations; however, for current deer and goat population levels in Unit-1A, there appears to be no direct correlation in terms of population densities.

[4] "Effects upon subsistence users. The islands and the Cleveland Peninsula portion of Unit-1A are in the Ketchikan non-subsistence area, and make up most of the quality deer habitat in the unit. Subsistence use of deer in Unit-1A depends largely on deer abundance. As deer numbers increase following mild winters, hunter effort increases proportionately. Deer meat provides a considerable amount of the red meat for consumption by Unit-1A



residents, as the only other ungulates available are mountain goats which are common and moose which are scarce.

[5] "Cost, feasibility and potential effectiveness of possible management actions. With the notable exception of ensuring maintenance of existing old-growth forests, little can be done to increase deer densities in Southeast Alaska. ADF&G needs to continue working with the Forest Service and private land owners in an effort to maintain quality habitat. Where logging occurs, it is imperative that proliferating human access be minimized by strict attention to road placement, administrative and/or mechanical road closures after logging, and regulations that ensure viable deer populations.

[6] "Land ownership patterns within the range of the population. The vast majority of deer habitat in Unit-1A is under federal jurisdiction of the Tongass National Forest. In addition, a portion of the mainland is designated as the Misty Fiords National Monument, within the Tongass forest.

[7] "Degree of accessibility to harvest. Accessibility by boat is very good throughout the area. The only areas largely inaccessible are parts of the mainland away from the coast, where habitat is limited because of high elevations and snow and ice cover.

[8] "Other factors. Since 1990, both state and federal subsistence hunting regulations have been in effect. State regulations were adopted by the Alaska Board of Game and apply to all lands in Unit-1A. State and federal deer hunting regulations remain identical in the unit.

"And our recommended objectives, for population is 14,781 and a harvest of 725. And I'd like to point out an error in transcription, my error. That number is actually 14,741, as shown on the sheets that Matt Kirchhoff addressed.

Chair (13:02): "Doesn't matter. It will be OK.

Streveler (13:08): "Ms. Chair, **after hearing Mr. Denniford's exposition and looking at number 5, which says and I quote 'little can be done to increase deer densities in Southeast Alaska,'** and it gives some reasoning for that. And we've heard that before. I suggest that we – I make the amendment that we change the population and harvest numbers to 15,000 and 700 respectively ..."

Second.

"... and call for the question."

Question.

Chair (13:41): "Is there any objection to the amendment to change the population objective to 15,000 and the harvest objective to 700?" Hearing no objection, we have a population objective of 15,000, harvest objective of 700 for deer in Unit-1A. Any further discussion? Any questions for the Department?

Call for the [main] question.

Fleagle (14:12): "Well Ms. Chair no questions, but **I know this Board really doesn't like to slam-dunk proposals without having some track record on the record. So, I'll just say that I'd like to reference the discussion that we had on the Unit-4 deer objectives, for the reasons for coming up with these numbers.** I feel adequately satisfied that they're going to meet our objective.

Chair (14:43): "Thank you, Mike.

[ Passed 7-0. ]

Denniford (15:18): "No, Ms. Chair, we'd like to address Unit-2 next.



Roczicha (15:34): "Ms. Chair, I move that the Board find that the population objective for deer in Unit-2 be 71,248, the harvest objective be 2,728.

Second.

Chair (15:48): "Thank you, Ms. Chair.

[1] "The effects of weather, habitat capability, diseases and parasites for the Unit-2 deer population. Diseases and parasites appear to have negligible impact on deer populations in Unit-2. Severe winter weather causes periodic declines in the deer population, especially in areas where clearcut logging has removed old-growth forests. Among other deleterious effects, removal of the old-growth canopy allows snow accumulation on the ground above normal levels, limiting the value of critical habitat to support over-wintering deer populations. Prince of Wales Island has seen some of the more aggressive logging in Southeast Alaska, and within the next 20-30 years we anticipate deer habitat capacity to decrease substantially.

[2] "Maintenance of viable predator populations. Wolf populations are healthy in Unit-2 and can affect deer populations at least in local areas. We believe black bear predation on deer is significant where bear occur in high densities. Anecdotal evidence supports the idea that scavenging of deer carcasses by black bear, marten and bald eagles may provide periodic food resources, but is probably not important for maintaining these populations. Deer are the mainstay in the diet of wolves in this unit.

[3] "Maintenance of habitat suitable for other species in the area. There are no other ungulate populations in Unit-2 that deer compete with, although marten exist in the unit and have been shown to be old-growth dependent.

[4] "Effects upon subsistence users. Subsistence use of deer in Unit-2 depends largely on deer abundance. As deer numbers increase following mild winters, hunter effort increases proportionately. Deer meat provides a large proportion of red meat for consumption by Unit-2 residents, although there is significant use of seals and some amount of use of black bears.

[5] "Cost, feasibility and potential effectiveness of possible management actions. With the notable exception of ensuring maintenance of existing old-growth forests, little can be done to increase deer densities in Southeast Alaska. ADF&G needs to continue working with the US Forest Service and private land owners in an effort to maintain quality habitat. Where logging occurs, it is imperative that proliferating human access be minimized by strict attention to road placement, administrative and/or mechanical road closures after logging, and regulations that ensure viable deer populations. Wolf control efforts in the 1980s in Southeast Alaska were found to be expensive, time consumptive and ineffective.

[6] "Land ownership patterns within the range of the population. Most of the deer habitat in Unit-2 is under federal jurisdiction of the Tongass National Forest, although private corporations own a considerable amount of land in this unit.

[7] "Degree of accessibility to harvest. Accessibility by boat and highway vehicles is very good throughout most of this area. Off-road vehicle use is increasing by deer hunters.

[8] "Other factors. Since 1990, both state and federal subsistence hunting regulations have been in effect. State regulations were adopted by the Alaska Board of Game and apply to all lands in Unit-2. In recent years there has been a federal doe season in Unit-2 that is open only to federally-qualified subsistence hunters, which include rural residents of Units 1A, 2 and 3.

"Our population objective is 71,248 deer, with a harvest objective of 2,728 deer.

Chair (19:07): "Thank you, Bruce.



Dennerlein (19:09): "I'd like to speak to this. I'd make an amendment to say that the population objective be established at a round number of 71,200, and 2,700 for harvest objective. And if I have a second, I'll speak to it. OK, go rounder? 71,000 and 2,700.

Second. (Chair: "You've got a second, go ahead.")

Dennerlein (19:44): "OK, let me just say that I think the record should show that we're being internally consistent with **the approach we're TRYING to take, with beginning the first step of setting these targets for Southeast Alaska, given the realities of weather and the other conditions.** I would also like to say that we recognize some DIFFERENCES in this unit; some factors in this unit that it's not just a cavalier thing. We're aware of some differences. **And the record should show** that we recognize that wolves and predators have some effect, but that both the fact that the limited population of wolves is a concern under other land managers and other US law, **AS WELL AS the previous and fairly recent efforts in the early '80s on predator control proved to be NOT effective in terms of cost and return on investment and other factors.**

"Secondly, for the most part we're meeting hunter demand, and especially we're meeting the subsistence demands here. Third, and finally, that the major concern in this area is to maintain a fairly high quality and very accessible hunter opportunity, here. And that mostly focuses on forest practices on BOTH public lands and private lands. And so the management, if we are going to intensify management, it probably means not only in this case data gathering, but it means intensifying our efforts in working with the Forest Service and private land owners in the importance of forest practices and maintaining a high quality and high level hunt on this important population. That would be my assessment as I see the situation, for the record, in making my amendment.

Question. [ Pop. obj. of 71,000; harvest obj. of 2,700. Amendment Passed 7-0. ]

Chair (24:45): "We have before us the main motion, which is the same as the amendment. Any further discussion? Ready for the question?"

[ Passed 7-0. ]

Chair (23:20): "So we just completed population and harvest objectives for the Ketchikan Area. And I said we could go home after that, right?"

Dennerlein (23:31): "If I could ask a question of the Chair and maybe through the Chair, I'm interested if anyone is going home, and if there are not anomalies in the other couple of Southeast units, while the issue is clear and fresh in our minds and we're on a roll. Maybe we can address if there are substantial differences and anomalies then I wouldn't hold us up. But if we can do this in a few minutes, with good reasoning and thought, then I'd like to see if we could complete it.

Chair (24:11): "Complete what?"

Dennerlein (24:12): "Setting the population and harvest objectives for the other Southeast units on deer.

Chair (24:17): "No, we're going to stick to the roadmap here. If we're going to go on, we're going to go on to Proposal 23 and finish Ketchikan Area.

[[ Meeting adjourned for the night after other announcements. ]]

## **Tape 23-B**



Chair: We might be ready to move into population objectives and harvest objectives for deer in Unit 3. Greg Roczicha.

Roczicha: Move that the board find the population objective for deer in Unit 3 be set at 14,868, the harvest objective at 852.

Streveler: Second.

Chair: Bruce Denniford.

Denniford. Thank you Ms. Chair. For deer in Unit 3:

For the effects of weather, habitat capability, diseases and parasites — We note that diseases and parasites have negligible impact on deer populations in Unit 3. Severe winter weather causes periodic declines in the deer population, especially in areas where clearcut logging has removed old-growth forests. Among other deleterious effects, the removal of old-growth canopy allows snow accumulations on the ground above normal levels, limiting the value of critical habitat to support over-wintering deer populations.

Maintenance of viable predator populations. Deer populations are healthy in Unit 3 and can affect deer populations at least in local areas. [sic] We believe that black bear predation on deer is significant where bears occur in high densities. Anecdotal evidence supports the idea that scavenging of deer carcasses by martens and bald eagles may provide periodic food resources, but it probably not important for maintaining these populations. Deer are the mainstay in the diet of wolves in this unit.

Maintenance of habitat conditions suitable for other species in the area. Evidence suggests that deer, moose and elk may compete for limited food resources in some situations. However, for current deer, moose and elk population levels in Unit 3 there appears to be no direct correlation in terms of population densities.

Effects on subsistence users. Subsistence use of deer in Unit 3 depends largely on deer abundance. As deer numbers increase following mild winters, hunter effort increases proportionately. Deer meat provides a large portion of the red meat for consumption by Unit 3 residents, although there is significant use of moose and black bears.

Cost, feasibility and potential effectiveness of possible management actions. Protecting old-growth forest and treating second growth clearcuts can maintain existing deer densities in Southeast Alaska. ADF&G need to continue working with the Forest Service and private land owners in an effort to maintain quality habitat. Where logging occurs, it is imperative that proliferating human access be minimized by strict attention to road placement, administrative or mechanical road closures after logging, and regulations that assure viable deer populations. Wolf control efforts in the 1980s in Southeast Alaska were found to be expensive, time consumptive, and ineffective.

Land ownership patterns within the range of the population. Most deer habitat in Unit 3 is under federal jurisdiction of the Tongass National Forest, although a private corporation owns a large section of north Kupreanof Island.

Degree of accessibility to harvest. Accessibility by boat is good throughout most of the area. Highway vehicle access is good on some islands with communities.

Other factors if any. Since 1990, both state and federal subsistence hunting regulations have been in effect. State regulations were adopted by the Board of Game and apply to all lands in Unit 3. State and federal deer hunting regulations remain identical in Unit 3.

Recommended objectives. For our recommended objectives, our population objective is 14,868. Harvest objective of 852.



Streveler: Ms. Chair, I move with an amendment to alter the population figure from 14,868 to 15,000; and the harvest figure from 852 to 900.

Dennerlein: Second.

Chair: OK, we have before us an amendment to find the population objective 15,000 and the harvest objective 900. Greg, would you like to speak to your amendment.

Streveler: Yes, Ms. Chair. We heard a lot of testimony yesterday and in other deliberation on Unit 1 deer that led us to believe these figures were rough estimates, and the precision is probably a bit misleading in the unrounded form. So it's simply trying to clear that up.

Chair: Further discussion on the amendment? Question's been called on the amendment. Margaret, please poll the board.

Margaret: [polling the board, the amendment passed 7-0.]

Chair: We have before us the main motion as amended. Any further discussion?

Roczicha: As in other areas around here, the management actions are fairly limited in what could be done in terms of intensive management goes, largely driven by climatic conditions and also the prevalence of lands that are not under state jurisdiction. Other than that I have no further questions.

Chair: OK, the question has been called on the main motion as amended, to define the population objective for deer in Unit 3 to be 15,000, harvest objective 900, for final action on this motion. Margaret?

Margaret: [polled the board, motion carried 7-0]

## **Tape 28**

*[ The deer populations and harvest objectives, statewide and including the ones above for Region-1, were approved in a regulatory motion on this tape. There was no discussion during that agenda item that was specific to deer, Region-1, or the issues discussed above. ]*



# **BIG PROBLEM — Alaska’s “One-Voice” resource development policy**

By censoring State scientists, this development-first policy corrupts forest and wildlife management at the federal & state levels in Southeast Alaska

Application of the policy is also evident on other issues elsewhere in Alaska

Larry Edwards / Greenpeace

**November 2014,<sup>1</sup> Rev. 1<sup>2</sup>**

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<sup>1</sup> This is a substantial rewrite of our earlier introductory paper on the One-voice policy.

<sup>2</sup> The incorrect word “not” is replaced with “now” in the last line of first paragraph of the Introduction.

## 1. Introduction

The State of Alaska's has an unwritten but rigid, heavy-handed policy that it speaks with only "*one voice*,"<sup>3</sup> to block public knowledge of impacts to fish and wildlife that – if exposed – may imperil the extent or feasibility of development projects. Greenpeace found unequivocal evidence of the policy through state and federal public records requests.<sup>4</sup> The record pertains mostly to logging issues on the Tongass National Forest and on State Forest lands in Southeast Alaska. Prior public information shows the *one-voice* policy's application to marine resources in Cook Inlet, and quite likely the policy is now being applied broadly, statewide.

Concerning logging on the Tongass, the record shows the *one-voice* policy is a single-minded effort to maximize timber production, accomplished by suppressing legitimate, contradictory professional discourse at all levels within the state's resource departments and by concealing from the public and federal agencies any conflicting information or dissenting professional opinions. The policy can only harm the management of fish and wildlife populations and prevent any assurance of an adequate amount and quality of habitat to sustain them.

Justifications state officials give for the *one-voice* policy are that confusion is created when the state's departments give differing opinions on logging projects, and that official comments and remarks by state biologists which point to a project's environmental problems sometimes become fodder for litigation by environmental organizations. In practice, however, the policy conflicts directly with principles of open government, the public's right-to-know, professional and ethical obligations of the state's scientists, and requirements of the Alaska Constitution for sustaining fish and wildlife populations. Ultimately the state's *one-voice* policy conflicts with the need for good, informed decisionmaking by both the state and federal governments.

These are not mere allegations. The large body of records we acquired demonstrates such practices repeatedly. A large portion of that record is now compiled into "*The Book of One-Voice*," for which the present document serves as a separate introduction. The book is a *chronological* 600-plus page collection primarily of emails, with news stories and other material added for the context of the times. The book presents parallel, interwoven stories showing how, within both state and federal government, the state's *one-voice* policy has corrupted the flow of information, resource planning and decisionmaking processes, and – at ADF&G – scientific and professional endeavors. Most important, the policy is highly detrimental to wildlife populations and their habitats, including the Alexander Archipelago wolf and Sitka black-tailed deer (an important subsistence species), among others. Timber project planning in game management units (GMUs) 1A, 2 and 3 has been adversely affected.

Content of *The Book of One-Voice* is also relevant to the on-going Endangered Species Act consideration for the Alexander Archipelago wolf. Indeed, the record shows that the *one-voice* policy has heavily skewed the state's comments to the Fish & Wildlife Service and other efforts by the state concerning the potential listing.

Because non-email documents included in *The Book of One-Voice* are excerpted or summarized to minimize the size of the book, we put the whole documents in a zip file archive (**Chrono.zip**, available from [ledwards@greenpeace.org](mailto:ledwards@greenpeace.org)). It also includes compilations of some of the more important email threads, since in the book all threads are interwoven. To aid access and understanding, the filenames in *Chrono.zip* are numbered chronologically and include a descriptive name. The book and the archive work together, and one is not a

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<sup>3</sup> State employees commonly refer to the policy with this phrase.

<sup>4</sup> Our Alaska Public Records Act request alone netted 16,000 pages of documents (mostly digital). There are substantial redactions, although some were lifted in 2013 on appeal of the original response. We also obtained relevant documents through FOIA requests to the US Forest Service.

replacement for the other. Below, files in the archive are cited by their sequence numbers in the zip file archive, *e.g. Chrono.55*.

## **2. The State's "one-voice" apparatus for promoting Southeast Alaska logging**

The state applies its *one-voice* policy in Southeast Alaska through an apparatus consisting of several governmental bodies and policy instruments. These include, at a minimum, the State Tongass Team (STT), the Alaska Board of Forestry, the official Alaska Timber Jobs Task Force, and several memorandums of understanding (MOUs) with the Forest Service. Here, the STT is described. Other parts of the apparatus are discussed in later sections, and the MOUs are listed and summarized in Appendix A.

The STT is a high-level, publicly invisible body within state government. We learned of it only through our public records requests. Those records show clearly that the STT has had an onerous influence on Tongass timber sale planning – particularly since 2010. The STT's influence in this arena includes meetings of some of its members with Forest Service personnel, the suppression of vital information that would otherwise be included in the state's comments on timber sale EIS's, and the direct participation of some of its members in the Forest Service's timber project planning. (Chrono.46 at 16-17). STT's original purpose was to consolidate the state's Tongass Forest Plan DEIS comments, in 2007 (Chrono.42), a time when honest professional dissent (differing from dogmatic policy) was tolerated and even valued. Today the STT heavily censors such information. (Chrono.26 at 3).

A high-level political agenda drives the STT. All 24 STT members are State employees, dominated by DNR staff and representatives of the governor and the attorney general. Ten are from DNR; four are from the governor's staff or AG-staff. Six are from ADF&G, and four are from other departments. (Chrono.46; *see also* e-mail address header in Chrono.34 at 0887). The STT is chaired by a DNR official, with recent chairs being DNR Deputy Commissioner Ed Fogels, and lately DNR employee Kyle Moselle. As STT chair, Moselle filters comment submissions from all state departments regarding Tongass timber projects and submits the final, heavily-filtered *one-voice* comments to the Forest Service. (Chrono.157). Previously, while an ADF&G Habitat Division staffer, he solicited comments from all the department's divisions, and submitted the heavily filtered comments directly to Fogels. (Id.) He also exerted state policy as a voting member for the state on the Tongass Futures Roundtable (TFR)<sup>5</sup> until the State withdrew from that body. (Chrono.46 at 18). Another function of the STT is to directly "engage[] with regional and national USFS leadership through the Governor's Office." Going into 2011 the governor's representatives on the STT were Randy Ruaro (the governor's deputy chief of staff) and John Katz. (Chrono.42 at 23).

## **3. The "one-voice" policy at work — an explanation of its function and three case studies**

This section covers two of the several ways the *one-voice* policy is applied. The subsections include two case studies of how critically important information about wildlife and wildlife habitat was deliberately eliminated from the State's comments on two Tongass National Forest timber projects, even demanding that the Forest Service remove information seen in an advance draft copy of an FEIS. Other subsections provide an explanation of the means and motive for doing that and a case study of gag order withholding ADF&G expertise from a crucial interagency meeting on the Alexander Archipelago wolf. First, some background.

The State's practice, since 2010, is to submit a single, *one-voice* comment letter on a Tongass timber project, at both the scoping and DEIS stages. Before 2010, the state had simply compiled the as-provided individual comments from its multiple departments and divisions

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<sup>5</sup> *See*: section I.D (especially I.D.2) of our August 2013 appeal (Chrono.160) of the Big Thorne project, discussing the deal making at the TFR with respect to FACA and Tongass timber project planning.

into a single submission, sometimes with a cover summary or policy statement. (e.g. the state's 2007 comments on the Tongass Forest Plan DEIS, Chrono.167).<sup>6</sup> Not surprisingly, there was diversity in these pre-2010 comments as each agency has its own resource mandate, and development activities result in resource tradeoffs. (Chrono.46 at 16-17). This diversity of comments was vital, providing a relative freedom in the transfer of information from the state's experts to the interested public and federal decision makers. An example from this earlier era is ADF&G's 2008 comments on the Navy timber sale project (Chrono.5), which were submitted independently by ADF&G and are good for comparison to examples below of highly censored comments submitted in the current era under the *one-voice* policy.

The Board of Forestry was informed in 2011 of the then-recent *one-voice* policy's objective, by DNR Division of Forestry official and STT member Clarence Clark:

“... the State's comments on federal sales have been asking for maximized volume based on the Tongass Land Management Plan (TLMP), including roadless and roaded lands.”

(Chrono.60 at 5). In pursuing this objective of maximizing logging, it is clear – from both the record we have acquired and the content of recent State's comments on timber projects<sup>7</sup> – that the STT is not a legitimate clearinghouse for State comments. It is a mechanism of suppression and censorship, with no tolerance for any ecological knowledge or professional opinions of State biologists becoming public that might interfere with maximizing logging. This conduct is deliberate corruption of the State's role under memorandums of MOUs between the State and the Forest Service (Appendix A), making the state an official “cooperating agency” in the NEPA process. This misconduct by the State is most evident through the lens of two large timber projects, Tonka and Big Thorne, in subsections (a) and (d) below. Subsection (b) is an explanation, in the state's own words, of the motive and means used concerning those and other projects. Subsection (c) exposes the direct suppression of an ADF&G researcher, with attempts to manipulate his input at a crucial closed-door interagency meeting, and ultimately resulting in him being blocked from attending.<sup>8</sup>

***a. The Tonka timber project — A case study of State suppression of ADF&G biologists***

Current STT chair Kyle Moselle is, through the MOUs with the Forest Service, a member of the Forest Service's Joint Review Team.<sup>9</sup> This gave him the opportunity to review a preliminary draft of the FEIS (a PFEIS) for the Tonka timber project. Minutes after receiving it on March 5, 2012 he sent an e-mail to the Forest Service's Tonka planning team, saying:

“To avoid conflicting statements, the State consolidated all departmental comments on this project through the State Tongass Team. ... quoting an individual state biologist in a DEIS or FEIS undermines the **“one voice”** process the State has put in place. Please remove all quotes from individual state employees in your FEIS, and refer to our consolidated comment letter for this project dated December 12, 2011.”

(Chrono.149 at 4, *emph. added*). The quotes in question, by ADF&G Area Biologist Richard Lowell, had been obtained by the Forest Service between the DEIS and FEIS stages of the project. The Forest Service complied with Moselle's request, by removing Lowell's statements and substituting a similar quote from ADF&G's earlier official scoping comments on the

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<sup>6</sup> A late addition to Chrono.zip, placed out of chronological order.

<sup>7</sup> e.g. the Tonka, Big Thorne and Mitkof Island timber projects.

<sup>8</sup> See also: Section 4(a) discusses the similar suppression of two ADF&G scientists who were on the Cook Inlet Beluga Recovery Team, and the repercussion of that suppression.

<sup>9</sup> In the JRT process certain State and Forest Service officials review pre-publication versions of NEPA documents (e.g. a DEIS or FEIS) as a final check on the project planning team's work.

project. Both quotes implicated the project as a contributor to long-term concerns for wolf and marten viability in the area that would eventually occur as a result of succession debt<sup>10</sup> from past logging and the added impact of the Tonka project.

Upon seeing the revision, Moselle on March 7 sent a formal letter to the district ranger, objecting to the substitute text in the revised PFEIS, and asked that it be removed. (Chrono.150). The Forest Service complied with Moselle's second request. These two actions by the Forest Service, at the behest of the state's *one-voice* apparatus, debilitated the FEIS of both the on-the-ground perspective of the project by ADF&G's Area Biologist (who has worked in the area for decades and is very familiar with the area and its issues) and the information in ADF&G's earlier expert scoping comments.<sup>11</sup> Expert knowledge within ADF&G about the project's impacts was censored to avoid impeding the project's timber yield.

***b. The "one-voice" policy unleashed, as described in its primary executor's words***

The 2010 Annual Report of DNR's Division of Forestry explained, "[b]ased on the Tongass Team work, the State of Alaska now provides **a single set of comments** on USFS projects instead of each agency providing separate comments." (Chrono.46 at 16-17, *emph. added*).

At its March meeting that year, Moselle informed the Alaska Board of Forestry about that new policy and the motive for it. According to the board's minutes:

"Nichols asked whether the decision on the Diesel/Logjam timber sale will be upheld in the 9th circuit court. It was litigated based on state-federal wildlife biologist correspondence. Have the lines of communication changed?"

"Moselle explained that one of plaintiffs said there wasn't a proper evaluation of wolf mortality, and used a [FOIA] request to get e-mails from individual biologists. The timber sale was upheld at the district court. ADF&G is learning a lot through this process, and learning about the roles of individual biologists, leadership, and the consolidated state Tongass Team. One lesson learned is that a coordinated comment letter from the state after the FEIS and Record of Decision (ROD) is important. The biologists' comments in question came at the DEIS stage, but a lot changed before the final. At the DEIS stage there will still be concerns. ADF&G provided information to the court supporting the sale. ADF&G is learning how to avoid creating problems for the attorney general's office in subsequent litigation."<sup>12</sup>

"Nichols commented that this isn't the first time this has happened. Comments by state employees have had a big financial impact on this industry. He felt good at last Board of Forestry meeting that the agencies were speaking with one voice, and then comments by state biologists were the basis for a lawsuit on the Logjam timber sale."

"Moselle responded that you can speak with a unified voice without tying the hands of individual biologists to correspond on specific issues. The legal issue is what the state's official opinion is, rather than an individual biologist's. Nichols replied that there is a lot of credibility because of a person's status as a state biologist in the court review. Just slowing the process down has a big impact. Moselle observed that what's different with the Logjam suit is that those e-mails were sent before Moselle was involved. When he started, he teased that issue out of the Logjam project – it relates to a larger scale situation across all of Prince of Wales Island, not an individual project. Individual biologists haven't seen that scale. ADF&G is now working with the USFS at the

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<sup>10</sup> Regarding succession debt, *see*: Person & Brinkman (2013). In-press version at [Chrono.67](#). Published as: Person, D & Brinkman, T., Succession Debt and Roads: Short- and Long-Term Effects of Timber Harvest on a Large-Mammal Predator-Prey Community in Southeast Alaska. *In*: North Pacific Temperate Rainforests, edited by Orians, G. & Schoen, J. Seattle, WA. Univ. Washington Press.

<sup>11</sup> Our admin. Appeal of USFS's Tonka decision & FEIS was denied; no litigation followed. *See*: section VIII of the appeal ([Chrono.154](#)); citations in that section are in Chrono.zip but cannot be referenced by sequence numbers since the chronology has expanded with additions throughout the archive.

<sup>12</sup> The litigation was against the Forest Service; the state was an intervener.

appropriate scale on the appropriate management issue. That's coming to bear on the legal case too. Logjam was the first timber sale where the state spoke with **one voice**, but the sale planning occurred before all the new processes were in place – it's a transitional project.”

(Chrono.20 at 7; *see also*: Chrono.26 at 3, minutes of an August 2010 meeting).

**c. Gagged – ADF&G's Alexander Archipelago wolf expert and the 2011 Wolf Task Force**

Because of wolf mortality concerns raised by ADF&G wolf expert Dr. David Person in 2009 about the above-mentioned Logjam timber project, a first-ever interagency Wolf Task Force meeting was held in Ketchikan on October 12-13, 2011. The concern triggered a provision of the Tongass Forest Plan that the task force be formed. The meeting had been long delayed, until Person and Brian Logan (USFS Forest Wildlife Biologist) could complete a draft analysis of wolf mortality on Prince of Wales Island. In late January 2011 it was reported that this was nearly complete, and that the meeting would be held when it was ready. (Chrono.50). Preparation for the meeting (scheduled for mid-October) began in earnest in September, when the report had cleared lengthy internal reviews. (Chrono.84).

It had long been planned that Person would be a presenter and participant at the meeting. (Chrono.105.; Chrono.104). Doug Vincent-Lang — who was then a special assistant to the ADF&G commissioner on ESA matters — was interested in the meeting during its planning. (Chrono.100, .102, .103). On October 10 Logan notified Person that “I dropped the mortality analysis from the agenda as per direction from DVL.” (Chrono.105).<sup>13</sup>

An hour later Logan got a message from an ADF&G biologist: “Dave has not been authorized to say **anything** at the Wolf Task Force meeting this week by HQ.” (Chrono.106, orig. emph.). Logan wrote immediately to the Deputy Forest Supervisor and the Thorne Bay district ranger:

“Not having Dave Person available to present a synopsis of the (his) research on wolves in GMU2 leaves the group without a scientific foundation

This is especially problematic given three of the four objectives (bolded below) are dependent on information acquired/provided by ADFG.

**OBJECTIVES**

- **A common understanding of the problem(s)/issue(s) to be addressed**
- **Identification of available information and information needs**
- Develop a process (e.g., the Taskforce) for collaborating on wolf conservation needs
- **Formulate a plan for filling data gaps and addressing conservation issues”**

(Chrono.106, orig. emph. & parenthesis). Logan followed up that afternoon with a message to the Forest Supervisor and the Deputy Forest Supervisor:

“I've just been informed that Dave Person has not been authorized to speak at the interagency wolf meeting being held this week in Ketchikan.

It is especially important that we have Dave Person available to present a synopsis of the available research/information pertaining to wolves in GMU2.

One of the primary goals of the meeting is to develop a common understanding of the issue(s) so we need to have access to the information that helps define the issue.

Please consider contacting Corey Rossi direct to ask him to allow Dave Person to participate in the work group.”

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<sup>13</sup> DVL means Doug Vincent-Lang

(Id.). It is surprising that Person was excluded from the meeting by his own agency, especially since the meeting was closed to the public and open only to the task force biologists, and was held in Person's home town. After hearing that he had not attended, we inquired "why" of some participants but got only vague answers about his absence. Official notes of the meeting, compiled by Forest Service employees from the combined notes of participants, are silent on the matter. (Chrono.110). The answer later turned up in a response to our APRA records request, as above and in the handwritten notes of one of the attendees, ADF&G biologist Neil Barten. (Chrono.111, .112). Person's supervisor banned his attendance because a gag order on what he could present was being exerted by high-level political appointee Doug Vincent-Lang.

Because Barten's notes (Chrono.111) are not easy to read, below is a partial transcription (from Chrono.112) in which names are identified from initials that Barten used. Corey is Corey Rossi, the then Director of ADF&G's Wildlife Division, and Doug Vincent-Lang is now the acting director but at the time was a special assistant to the Commissioner and ADF&G's ESA coordinator. The "listing process" refers to an Alexander Archipelago wolf ESA petition filed two months earlier by the Center for Biological Diversity and Greenpeace.

**Corey:** You can't separate this task force discussion from the listing process.

**Corey:** I've heard from at least 3 people that we have imposed a gag order on Dave [Person] and that's not true. What Doug Vincent-Lang said was that Dave needed to provide a copy of the presentation [for this meeting] for review before [the] meeting – Dave didn't comply.

**Neil:** Well from our perspective that is a gag order – therefore we told him not to attend.

**Corey:** Who can present info or give an overview of wolf research and ecology?

**Neil to Corey:** You should have acted as an intermediary between Doug V-L and us.

**Corey:** Heard from Forrest Cole that biology has been "muzzled."

**Neil to Corey:** Review the teleconference. Also [unintelligible] Doug V-L's e-mails.

**Corey:** Over & over. Inferences are the issue, not the science. [The following is apparently Neil's conclusion based on what Corey said]: So, Dave's data is fine, his findings are fine, his inferences are dangerous to the ESA process.

**Neil:** But his inferences are based on 15 years of research – probably the best insight into the issue.

**Corey:** But they are still inferences. Can do lasting damage to our efforts to fight the listing. A FOIA of the meeting would reveal Dave's inferences, which are basically the view of the commissioner's office since Dave is operating under the commissioner's authorization – Not going to happen – the Governor supports logging – we cannot say without equivocal info that road building equals less wolves. [An arrow from "equivocal" leads to]: We could instigate with season or bag limits.

**Neil, Brian, and Stephen or Steve:**<sup>14</sup> But with illegal harvest, bag limits don't work.

**Corey:** The wolf numbers based on seal, harvest, densities is sketchy – might not mean anything.

**Neil:** If wolves = dead wolves, is not mitigatable based on group discussions, is that concept on the table? Yes.

**Stephen or Steve:** We manage by inferences all the time.

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<sup>14</sup> Both Steve Bethune (ADF&G) and Steve Brockmann (USFWS) were present. *See also:* Chrono.113, handwritten notes of Stephen Bethune.

**Corey:** Yes, but in this case we can't infer as it is going to be used against us.

**[Apparently a conclusion of Neil; no designation for anyone speaking]:**

So, in the end the listing is shadowing this whole process. Corey is here as a watch dog to prevent DFG staff from "inferring" damaging opinion.

**Corey:** Tell me, what benefits would an ESA listing bring? Any?

**Brian and Stephen or Steve:** Protect old growth, which we say over and over is valuable.

**[Neil then has notes on a presentation by Boyd Porter, partially given here]:**

Mortality --> 50% illegal. Dave's work was due to a petition to list Unit 2 wolves in mid 1990s. Estimated 250-350

wolves in fall population – locals say wolves were at a high.

Dave couldn't find enough scat to get apt estimate. Visited 11 den sites – all vacant.

These notes expose politically motivated manipulation by the State administration to control discourse among its scientists – even to the point of total censorship and no discourse. Science and impartial management of public resources were circumvented by this control. Science simply cannot work this way.

In addition, the Forest Service's official notes for the above meeting did not accurately report what had happened. The whole story now known and with Forest Service personnel present at the meeting, the agency clearly is aware of the censorship yet it has taken no action to attempt securing the free flow of information from ADF&G scientists. (Chrono.158). To the contrary, the Forest Service is very complicit in the one voice policy. For example, its Big Thorne DEIS and FEIS did not disclose the problem with the flow or quality of information from ADF&G, even though the problem was clearly apparent from information (i.e. most of the documents now in Chrono.zip) that we provided the agency pre-DEIS, in June 2012.

***d. The State's expert biological opinion suppressed for the Big Thorne timber project***

For the Big Thorne project, the State intentionally withheld from the Forest Service the observations and opinions of an ADF&G research biologist who did 22 years of research and fieldwork on Prince of Wales Island and particularly the project area, beginning in the 1990s. Dr. David Person's work there has included many scientific reports and peer reviewed papers on dynamics of the island's ecosystem and on its wolves, deer, flying squirrels and bears.

In internal ADF&G emails, Person raised specific concerns regarding wolves and deer, backed up with maps, showing where the Big Thorne project would log and the magnitude of this very large project's impacts. It is the largest timber project on the Tongass in 20 years, in a heavily impacted area. The DEIS was debilitated by state's exclusion of Person's expert opinion from its scoping comments, and the portion of the comments concerning wolves and deer was highly generalized and pallid, in contrast to Person's specific concerns. Instead, the state's scoping comments focused on requesting a "maximum opportunity" alternative that would produce more timber. The Forest Service, too, is culpable for the debilitation of the DEIS, because it made no effort<sup>15</sup> to gain access to the expertise and advice of this uniquely qualified biologist, through its rights under its partnership arrangements with the State, in the MOUs. We had even asked the Forest Service to do so.

On February 28, 2011, in the middle of the scoping comment period, Person sent an e-mail — subject "Big Thorne" — to six other ADF&G biologists, including three superiors and

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<sup>15</sup> There is no indication of any such effort in the project planning record. Moreover if the Forest Service did make the effort but was rebuffed by the State, the DEIS should have disclosed that.

Moselle. It was long, and laid out clearly the problems the project presents for wolves, deer and hunters, including a viability problem for wolves. (Chrono.55). In all, from that day through April 18 Person wrote four e-mails about his concerns over the project, and Moselle had several responses. (Id.). Moselle, although expressing a fatalistic opinion about the inevitability and impacts of further intensive logging in the area, said on March 1 that he appreciated Person's input, and that:

"Much of your input will be valuable for our comments regarding the cumulative effects analysis in the DEIS ... one of the goals of NEPA is to fully describe the effects to the human environment from the proposed action, so the FS needs to detail the impacts to deer winter habitat, and your comments will help with that." (Id.)

This cunningly postponed exposure of Person's remarks until the DEIS comment stage. Two months earlier, Moselle and STT member Clarence Clark of DNR both made presentations to the Board of Forestry on implementation of the Tongass Land Management Plan. According to the minutes, "Clark said that the state is involved in scoping and draft EIS review stages. There's more opportunity for impact in the scoping stage." (Chrono.42). He is quite right because the scoping stage lays the foundation for the NEPA planning process. So, in accord with the *one-voice* policy, Person's views were delayed by Moselle to a point in the planning process where they would have the least risk of reducing the timber output of the project. And even then, only two of Person's points were included in the state's DEIS comments, and only in a cursory, ineffective way. Simply put, the primary thrust and high importance of his knowledge were censored from the get-go.

Ultimately, this backfired on the state. Person quit ADF&G in May 2013, and a formal declaration (Chrono.161) by him about the project's impacts was included in our August 2013 administrative appeal of the Big Thorne decision. (Chrono.160). The declaration was sufficiently compelling that the Forest Service's Alaska Regional Forester put a hold on the project until Person's declaration could be reviewed, by a six-person interagency Wolf Task Force. However, the review was disingenuous, with a predetermined outcome. The Chief of the Forest Service announced at a Senate hearing that the project would go ahead with at most minor changes -- long before the review was completed.<sup>16</sup> The WTF outcome was an even split, with the two members from ADF&G exercising the *one-voice* policy.

It is ideal at this point if the reader has read the email exchange in Chrono.55 among ADF&G biologists and Moselle, which began on February 28, 2011. Three short messages (Id. at 8, 11 & 12) are shown here to establish the veracity of problems Person exposed in Chrono.55:

From: Barten, Neil L (DFG)  
Date: Wednesday, March 02, 2011 4:24:00 PM  
To: Person, David K (DFG)  
Subject: RE: Big Thorne

Dave, after having spent a mere 3 days on POW, I came away frustrated with the scale of logging that is still taking place, and the proposed logging coming up. The landscape is so marginalized for deer and other species that it seems the whole house of cards will come tumbling down in the future. I know you have been preaching the carrying capacity decline for deer and in concert wolves for a long time, but I never saw it first hand before. ... What seems to be an industry that could be so productive at a local level for a long timeline, is being pissed away at a rate that will leave people sitting on their hands in 20 years going what the hell happened... this is just like the Grand Banks with fishing man ... I got so depressed last week that I had to shut up as I was ruining the day of the rest of the crew.

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<sup>16</sup> Chief Tidwell: "Senator, we're committed to completing the Big Thorne project. ... They may have to, as part of addressing the appeals, maybe drop a unit or two. That's something we could always look at. But I'm confident the majority of that project will go through." Senate E&NR hearing, 4/30/14.



After reading some of Moselle's messages in the Chrono.55 sequence, ADF&G's Chief Scientist made the first response below, and then after rereading Moselle's message again a few days later he wrote the second one. This shows frustration with ADF&G's intransigence in dealing with the kind of logging-related problems Person raised and Moselle resisted:

From: Titus, Kimberly (DFG)  
Date: Friday, March 04, 2011 4:27:00 PM  
To: Lowell, Richard E (DFG)  
Subject: FW: Big Thorne

I am not even reading this. This is why we need a State of Alaska-ADF&G deer management plan. After 20 years of observing us chasing our tails with the FS and their habitat/land management plan, why the hell don't we have our own deer management plan.

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From: Titus, Kimberly (DFG)  
Date: Tuesday, March 08, 2011 12:58:00 PM  
To: Larsen, Douglas N (DFG)  
cc: Person, David K (DFG)  
bcc: Lowell, Richard E (DFG)  
Subject: FW: Big Thorne

Just an observation from the bleachers.

Reading this makes my head spin.

It strikes me after 21 years that the region/division/department/state needs a deer (and perhaps wolf) management plan in southeast, that includes a habitat component. We get so wrapped up in either their deer habitat model or a 'cooperative' deer habitat model that we lose sight of our own mission. As such we attend endless meetings, get stuck in all of the Tongass minutiae, and end up wondering what we accomplished for sustainable and useable deer management. If the FS wants to join us, then fine. If we produce a management plan for deer that includes a habitat component and it is inconsistent with the FS or other landowners, so be it. **Seems to me that we are often second class resource managers in all of this.**

Lots of states have deer, elk or similar management plans. So why not us?

**There you have it.**

In April 2011, Moselle forwarded to the Forest Service's Big Thorne planning team some remarks Person had sent him in 2009 about deer and wolf considerations for thinning second growth. (Chrono.55 at 16). Moselle did not take that opportunity to also include the above recent 2011 correspondence. (Chrono.55 at 1-5, 7-8, 13-14). Person's 2009 information is of a notably different topic than his 2011 correspondence, in that by regarding thinning, knowledge in the 2009 message can be applied without jeopardizing the State's goal of maximizing the yield of old-growth timber from Tongass projects, Big Thorne in particular. We have confirmed with the Big Thorne planning team that that it did not receive any personal communications from Moselle or ADF&G conveying Person's 2011 concerns about old-growth logging and associated road building in the Big Thorne project. (Chrono.158). Compare the 2009 material that Moselle forwarded in Chrono.55 (at 16) to these points summarized from Person's 2011 messages in that same file, and you will see the gravity of the information that Moselle buried:

- 1) In the Thorne River and Steelhead Creek watersheds "[t]here are simply no methods of mitigation that will compensate for that much loss of winter habitat." "[S]everely affected." The statement is based on three habitat maps attached to the message.

- 2) Thorne watershed:
  - a. “[M]ost of the productive forest below 245m was logged over the last 25 years.”
  - b. Despite much pre-commercial thinning only a 3-7 year boost in forage resulted (Liz Cole paper attached),<sup>17</sup> “much of that forage is unavailable because of slash, which also may increase risk of death of neonate fawns (see Farmer et al. 2006). Indeed, during my current study of fawn mortality, most of our neonates collared within the proximity of pre-commercially thinned stands died from bear predation within or adjacent to that habitat.”
  - c. The Big Thorne project “goes further to remove the most important winter habitat for migratory deer in the watershed.”
  - d. “Many of the productive stands to be removed are situated above older clearcuts and are locally known for supporting deer during normal winters. Alpine and sub-alpine habitat is easily accessible to hunters in the watershed and many choose to hunt those areas ...”
- 3) Steelhead Creek “is another area hard hit by the sale”: Although Todd Brinkman reported deer as currently abundant in the watershed, “[t]heir survival was enhanced by the availability of low elevation winter range, much of which will be removed by the sale. Steelhead Creek is also a major subsistence hunting area and still appears to have a healthy population of bears.”
- 4) In the North Thorne, Big Lake, Luck Lake, and Gravelly Creek drainages:
  - a. “The Big Thorne sale will result in entries for the third time ...”. His maps that were attached (probably higher resolution than the pdfs we received) show large losses of winter range. “Much came from the private and state lands within the mapped area but as the maps show, much also came from the federal lands involved in the BT sale. Cumulative loss of productive forest habitat in those areas causes me to question the viability of those watersheds to maintain ecological functions and support a healthy predator-prey community.
  - b. “Wolf viability depends not only on reducing road density and risk of unsustainable harvest but also on abundant populations of deer. I doubt that a resilient and persistent wolf-bear-deer-human predator-prey system will be possible within the watersheds affected after the project is completed, if indeed it is still possible as current conditions progress inexorably toward stem exclusion. Current risks of unsustainable wolf harvest will be exacerbated by the project as deer become fewer in stem excluded forest and hunters blame wolves and bears for the lack of available deer. The legacy standard as written is of little value for protecting that ecological function. Basically, if there were only 3 old-growth trees left, the standard allows you to cut 2 of them. There is no lower limit below which no timber harvest is allowed.”
- 5) Wolf denning areas: “Finally, for now, the sale will impact 5 wolf denning areas (Trumpeter Lake, Big Lake, 3018 Long Lake, Angel Lake, and Upper Steelhead). With the exception of Upper Steelhead, each of those areas was used multiple times by wolves between 1993-2007.”
- 6) *Ending of his 2/28/11 message*: **“It is difficult to recommend any scoping changes other than simply to reconsider the whole sale because it will remove most of the best remaining old-growth in every watershed touched by the project. We are simply going to**

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<sup>17</sup> Probably Cole, Hanley & Newton (2010), *Influence of precommercial thinning on understory ...*

engage in a game of triage in which we recommend watersheds for which we hope to save some minimum level of wildlife viability and sacrifice the others.” [Emph. added.]

- 7) *Message of March 2*. He discusses wolf dens in the Big Lake, 3018, Trumpeter Lake, Angel Lake and Steelhead areas. In the Steelhead den area, “[t]urnover of wolves in that area is very high because of the roads and accessibility to hunters and trappers. The *Rio Roberts pack* and *Thorne Bay group* are also harvested very heavily.
- 8) “With respect to deer”: “TLMP does not assume that adequate habitat is maintained only in nondevelopment lands. There is the wolf guideline specifying a minimum deer habitat capability of 18 deer/mi<sup>2</sup>. The intent of the conservation strategy in TLMP was to create an integrated system of features that included reserves, areas deferred from logging, and standards and guidelines for management of the matrix. I attached a copy of a paper by Jerry Franklin and Dave Lindenmayer on conservation strategies.<sup>18</sup> They discuss why reliance on habitat reserves is often a recipe for failure and that the matrix of managed lands between reserves is critical to successful conservation. I attached 2 papers by Winston Smith and me (plus Sanjay Pyare) on flying squirrels and small OGRs that test some assumptions of the conservation strategy in TLMP and reinforce the conclusions of Franklin and Lindenmayer.”<sup>19</sup>
- 9) Concerning non-development lands within the matrix:
  - a. “[D]eer avoid habitats along streams and lakes during winters with deep snow (>50cm, brisket height). That includes productive old-growth stands that constitute stream buffers. Attached is table 8 from my deer monograph showing habitat selection results from >100 yearling and adult does on Heceta, POW, and Mitkof Islands. Two candidate models are shown ...”
  - b. Deer “select locations away from lakes and streams ... They avoid ravines (where streams flow), ridges (higher elevations), and large patches of habitats with open canopies and sparse understories (patch4) such as muskegs, unproductive forest, frozen lakes and streams, and road surfaces. When snow is deep, they also avoid locations with high forest canopy contrast (e.g.; areas with many forest openings). Deer likely avoid riparian buffers during winters because being in proximity of a lake or stream edge strongly increases the risk of predation by wolves. Consequently, nondevelopment lands associated with stream and riparian buffers are not going to contribute to winter habitat capability. Therefore, within timber production lands, that means only small OGRs, legacy trees (stands, patches, whatever they really end up being?), and beach buffers (only useful to deer adjacent to them), will constitute all of the winter deer habitat left.”
  - c. “We need to pay attention to what lands are left and where they are. Do they provide vertical connectivity for migratory deer during winters with snow and sufficient low elevation habitat to prevent losses of deer like we observed in the Maybeso during winters 2006-2008?”
  - d. Several of the watersheds in the Big Thorne project currently are extremely popular hunting areas (North Thorne, Steelhead, No-name Creek). What losses to hunting opportunities will occur over the long term as the carrying capacity of the watersheds for deer diminishes? Is there any coordination between the project and meeting subsistence needs? For example, will the USFS maintain sufficient habitat capability on lands available to hunters after road closures occur? I am not advocating keeping

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<sup>18</sup> Probably Franklin & Lindenmeyer (2009), *Importance of matrix habitats in maintaining ...*

<sup>19</sup> Probably these two papers are: (1) Smith, Person & Pyare (2011), *Source—sinks, metapopulations, and forest reserves ...* and (2) Smith & Person (2007), *Est. persistence of northern flying squirrel ...*

roads open that are slated for closing, but wonder if the USFS has given any thought to managing those lands that are easily accessible to subsistence hunters in such a way that deer habitat capability is maintained at a high level? [Emph. added].

10) *Message of April 15, 2011.*

a. **“I want to make one point very clear.** The Tongass Land Management Plan may or may not be adequate for protecting ecosystem functions and species viability. We simply don't know. It was based on some, not all, but some of the best science available in 1996. ‘Based on the best science available’ does not mean the science was adequate.” The TLMP “S&Gs only address a fraction of the ecological problems associated with industrial-scale timber harvesting of northern Pacific rainforests.” [Emph. added].

b. “Anyway, as a professional biologist who knows this ecosystem as well as anybody working here, who has worked in that system doing research on that system for almost 20 years, **I would hope that my comments and concerns about a proposed project will be transmitted up the ladder ...**” [Emph. added].

In conclusion, Dave Person has responsibly raised significant issues, based on his extensive experience in the project area and throughout the island as a field biologist, researcher and statistician. Following its *one-voice* policy, the State buried these issues and facts instead of raising them to the Forest Service in its scoping and DEIS comments on the Big Thorne project. The issues weren't raised even during a timely opportunity when the State's prime contact with the Forest Service, Moselle, made a personal communication to the agency.

As with the Tonka project and the first WTF meeting in 2011, here again is proof positive that the State of Alaska – through its *one-voice* policy – intentionally suppresses science and the state's biologists and withholds from the public and the federal decisionmaking process vital information about the impacts of logging projects on wildlife.

#### **4. The “One-voice” policy's pattern of abuse in other state & federal fact-based processes**

##### **a. Ethical conflict inherent in ADF&G policy compelled a scientific team to dismiss two ADF&G biologists**

In April 2011, through no fault of their own and only because of an ADF&G policy (Chrono.23) that created for them an ethical conflict, two ADF&G biologists were removed from the science panel of the federal Cook Inlet Beluga (whale) Recovery Team (CIBRT). (Chrono.69, .62, .63). The offending policy had been adopted by ADF&G in May 2010 (Chrono.23), and requires ADF&G personnel to speak the department's policy rather than their own scientific understanding or considered opinions. This conflicts directly with scientific process and in particular the function of the recovery team science panel and the formal terms of reference it operates under, but even under pressure from CIBRT and NOAA, ADF&G's commissioner did not relent. NOAA's dismissal of the two biologists, who themselves had raised the conflict of interest that the policy was through extended due-process. Concerns first appeared in the panel's meeting notes in December 2010. (Chrono.40), and were deliberated for months. (Chrono.49, .57). The ADF&G Commissioner was notified of the scientists removal from the panel on April 25, 2011. (Chrono.62).

##### **b. The State hid an adverse change from a federal judge for 4 months, in an ESA case**

The state sued the federal government in February 2011, another effort to avoid ESA listing of Cook Inlet belugas. The Anchorage Daily News noted: “[i]n a companion sworn statement, Doug Vincent-Lang, the endangered species coordinator in the Alaska Department of Fish and Game, said the state had implemented the coastal management program ‘to ensure the

orderly, balanced utilization and protection of the resources of the coastal area consistent with sound conservation and sustained yield principles’.” (Chrono.116).

However, several months later, *July 1, 2011*, the coastal management program expired. The State failed to inform the court. The Anchorage Daily News later reported: “In *August*, the Daily News asked Vincent-Lang whether he would inform the court of the demise of the program. In an email response, he said, “The declaration was valid at the time I made it,” and declined to comment further.” (Id.). Not until *late October* did the State inform the judge of the changed circumstance. The assistant attorney general who made the October filing “declined to explain why it took the state so long.” (Id.)

Here we have man who is a principal player in exercising *one-voice* policy regarding Southeast Alaska forest issues also pursuing *one-voice* policy on a wholly different issue in another part of the state. All that matters is the politically motivated wishes of the administration; truth and fair play are out the window.

**c. “One-voice” policy affects state timber sales & evaluations of private timber plans**

The primary application of the *one-voice* policy in Southeast Alaska has been directed at Tongass National Forest timber sales. Even so, the impetus to maximize timber production can be expected to influence the involvement of ADF&G and the Department of Environmental Conservation in evaluating both private timber plans that DNR has the primary responsibility to review, as well as timber sales that DNR prepares on state land.

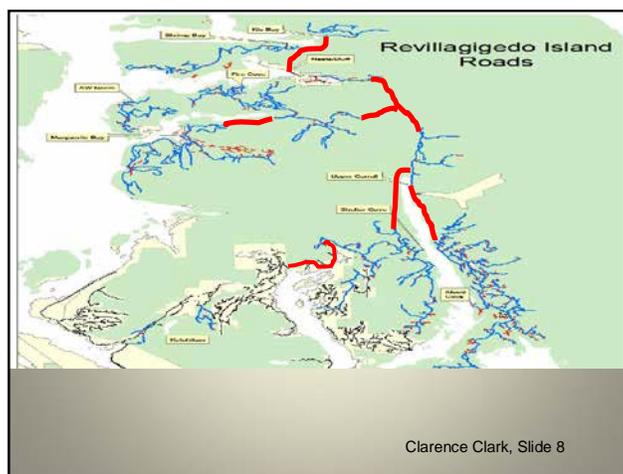
An example of the former is two University of Alaska timber sales on heavily logged Mitkof Island, and on which ADF&G did not provide substantive input.

An example of the latter is DNR’s North Thorne Bay #4 sale, located on state land within the Forest Service Big Thorne timber sale project area. It was put out for public comment in 2013 even though the Forest Service had just then put its Big Thorne sale on hold until wolf concerns could be reconsidered. ADF&G submitted only one page of comments, only on anadromous streams. This is unsurprising, since ADF&G missed even Big Thorne’s big wildlife issues, despite internal messages in Chrono.55 that shows substantial problems.

**d. “One-voice policy will likely affect potential land exchanges and “roads to resources”**

At present, the Alaska Mental Health Trust is seeking a 20,000-acre land swap for Tongass National Forest lands, exchanging lands it cannot log for others that it could. The new lands are proposed as large, economic blocks and can be expected to be clearcut in near entirety. Insightful, unbiased input from ADF&G is crucially needed on this proposal; however, with the *one-voice* policy controlling all such state comment or advice, this will not happen.

The same situation exists concerning DNR’s plans to interconnect the isolated road systems in Southeast that were created for past logging and to build several “marine access facilities” that can accommodate ocean freighters, for exporting logs. Here again, the *one-voice* policy can be expected to preclude the kind of input that ADF&G should be providing on regarding the irreversible, irreparable harms to fish and wildlife and their habitats that such projects can lead to directly, directly or cumulatively. For example, the problem created for wolf sustainability on Prince of Wales Island — a consequence of an extensive island-wide road system — may be repeated on Revillagigedo Island



Clarence Clark, Slide 8

by the DNR plan shown to the right, with planned roads in red. Revilla is the second largest wolf island in Southeast Alaska. The plan was announced Sept. 11, 2014 at a Forest Service meeting, as part of the state's "roads to resources" program.

##### **5. The "One-voice" policy's 2004 origin and its resurrection beginning in 2009-2010**

In 2004, under the Murkowski administration, the State put an aggressive and controversial one voice policy in place. (Chrono.2). A six-sentence memo signed by the commissioners of Environmental Conservation, Natural Resources, and Fish and Game banned separate written opinions about resource issues. "The commissioners say internal cooperative discussion instead of written documentation, available to the public, is good policy and makes sense because it will promote efficiency and trim red tape. ... Critics say it's another example of the Murkowski administration's agenda to stifle any voices, particularly those of biologists, that could hamper business activity and industrial development." (Id.)

The restrictive, *one-voice* approach to natural resource management is the antithesis of reasonable resource planning. A 2004 news article about then new policy explains:

"It's a means of cutting the public out of the debate,' said David Driesen, a law professor at Syracuse University who specializes in environmental issues. If there's no written record of agency concerns about development matters, successful court challenges to stop harmful projects will be tougher, he said. 'If the likely impacts ... aren't disclosed publicly, it'll be harder for citizens to influence decisions,' Driesen said." (Chrono.2)

Nonetheless, at least for Tongass National Forest timber projects the policy languished for several years following its 2004 announcement. Communication did still occur during planning of most projects between individual ADF&G biologists and the Forest Service's project planning teams. (e.g., Chrono.7). Eventually the policy waned to the point that ADF&G again began to submit its own detailed comments on EISs, such as on the Navy Timber Sale project in 2008. (Chrono.5). However, after the Forest Service's decision on the Logjam timber project (on Prince of Wales Island) was administratively appealed in 2009 on environmental grounds and a suit was filed, the *one-voice* policy was resurrected and aggressively pursued, as already covered in section 3(b). (That section includes an excerpt from the March 2010 Board of Forestry meeting minutes where STT chair Moselle explained the motive for the *one-voice* policy and the means for applying it).

In an August 2009 op-ed, Governor Sean Parnell decried administrative appeals of Tongass timber project decisions, which take about a three months following a decision (45 days each for the appeal submission and the Forest Service's consideration). The op-ed was published at the end of the decision making process for the Forest Service's Logjam timber project. His concerns in the op-ed only regarded timber supply and expressed no concern for impacts to wildlife or to private and commercial endeavors that rely on wildlife. (Chrono.16).

In an August 2010 letter to the editor, Governor Parnell announced an open-ended policy of countering concerns raised over any timber prospects: "Whether it's the Diesel timber sale [(part of the Logjam project)] or the exemption to the federal roadless rule, I've instructed Alaska's attorney general to intervene in cases to protect our economy." (Chrono.14).

A 2011 Parnell letter to the Speaker of the state House explained: "Alaska's timber industry and energy needs remain top priorities of my administration." (Chrono.51, letter to Rep. Chenault). Being members of the State Tongass Team, his Deputy Chief of Staff and several others agents of his are able to exert the Governor's timber top priority across all relevant departments, including ADF&G. (Chrono.34 at 887, *note* the list of e-mail recipients).

On May 5, 2011, Gov. Parnell issued Administrative Order No. 258 (Chrono.65) establishing the Alaska Timber Jobs Task Force (ATJTF) "as a combined federal, State, and private industry task force." By intent and construction, there is no representation of non-timber

forest-related businesses (e.g. commercial and sport fishing, recreation enterprises), NGOs or citizens that are impacted by large-scale timber projects. The ATJTF is not counter-balanced by any similar state body that could advocate for non-timber forest uses. Its members are:

- the Governor's Deputy Chief of Staff;
- Doug Vincent-Lang, Director of ADF&G's Wildlife Division and *one-voice* activist;
- the head of DNR's Forestry Division (Chris Maisch);
- representatives from the State's Community & Economic Development Dept.;
- three timber interests; and
- a representative of a logging community.

Among the purposes of the task force are: "(6) to survey, study, and submit a report to the State and the federal governments of current demand for timber in the Tongass National Forest and the specific business and economic opportunities that could be supported by such demand, if the timber were supplied; [and] (7) to review, identify, and report quarterly to the State and federal governments on possible timber sales in the Tongass National Forest that would meet demand with economical timber sales, including the identification of possible 10-year timber sales." (Id.) Big Thorne is one such 10-year sale.

Through its members, who are all State officials, the task force is directly linked to the State Tongass Team (chaired by Kyle Moselle of DNR) which prepares the State's One-Voice NEPA comments on timber sales and coordinates the participation of state agencies in implementation of the Forest Service's Forest Plan.

In a February 24, 2012 interview on KFSK radio, a caller asked Governor Parnell about a recently applied restriction on state biologists' free expression of their professional opinions:

(Caller): ... I'm noticing an abrupt change in the manner and ability of biologists to be able to speak freely and provide documents relevant to on-going permitting process. And I just want to ask you, has there been a directive by you to effect this change?

(Gov. Parnell): I have to figure out exactly what he's referring to. I can tell you that any fisheries management is based upon science. Any game management needs to be based upon science. The biologists who feel like they have been, um, change or anything. [Sic.] You know, like every governor before me, if statements of policy are issued, I want to know and my office wants to know what those statements are going to be, to make sure that they reflect the direction of this administration. And that has to do with making sure that science is adequately and fully interpreted and utilized. It has to do with making sure that the statutes and regulations are followed. So, I know that some people like to freelance and say and do their own thing, but when it comes to representing the public, I'm held accountable by the public for the decisions that are being made and sent forward. And so if something does implement or try to set state policy, you're darn right that your governor and commissioners get held accountable for those, and we need to know what's being said and where.

(Chrono.145 – the audio clip; Chrono.146 – a transcript).

Thus, the Governor Parnell was motivated to promote logging, and he put administrative mechanisms in place to accomplish that and to control what ADF&G biologists are allowed to say. This cleared a pathway for suppression and censorship of scientific knowledge and of the full and fair discussion of biologists' responsibly held perspectives. That is, the Governor's approach to controversy over how the forest should be managed is contrary to both the foundation of how science works and to the purpose and process of NEPA. This is a sad situation because a well-functioning democracy relies on a well-informed public and fact-based decisions. Views expressed by a well-informed public are broadly recognized as vital to good decisions by government. But in Alaska, top-down dogma – with several officials in the middle successfully enabling it – is prevalent.

## 6. The rest of the “One-voice” apparatus

As stated in the introduction, the State of Alaska’s *one-voice* policy apparatus consists of the State Tongass Team (STT), the Board of Forestry, the Alaska Timber Jobs Task Force (ATJTJF) and MOUs with the Forest Service that give the state privileges it can take advantage of. Here, some remaining blanks are filled in about the latter three.

### **a. The One-voice apparatus includes the Board of Forestry & Timber Jobs Task Force**

The Alaska Timber Jobs Task Force, established by the governor in 2011, was introduced briefly among the two previous pages. It has an exclusively timber industry and State government membership. By its intent and construction there is no representation for non-timber, forest-related businesses (e.g. no commercial or sport fishing businesses, recreation enterprises, etc.), citizens or NGOs that are impacted by large-scale timber projects. Also, the task force is not counter-balanced by any similar state body that could advocate, concerning logging, for non-timber forest users or uses. The government members are the governor’s Deputy Chief of Staff; ADF&G’s long-time Acting Director of Wildlife Conservation Division (Doug Vincent-Lang); the head of DNR’s Forestry Division (State Forester Chris Maisch); representatives from the state’s Community & Economic Development division; three timber interests, and a logging community representative. The high-level State employees provide a direct linkage between the task force and the State Tongass Team.

The Alaska Board of Forestry is chaired by the State Forester and the rest of the membership is from industry or is industry oriented except for one conservation seat held by someone appointed by the governor this year and who is not from Southeast Alaska.<sup>20</sup> The Board of Forestry sends an annual report to the governor.

### **b. The nature of the State / USFS partnership, through MOUs**

For federal timber projects, the *one-voice* policy is exercised in part through memorandums of understanding between the Forest Service and the State, or sometimes directly by a state department such as ADF&G or DNR. (Chrono.26 at 3;<sup>21</sup> .42 at 26;<sup>22</sup> .14 at 1;<sup>23</sup> and .34 at

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<sup>20</sup> From governor’s press release: “Stark, of Fairbanks, is a biologist specializing in fisheries research at the [Univ.] of Alaska Fairbanks [UAF] ... works with the Bering Sea Fishermen’s [Ass’n] and owns his own fisheries research consultancy. ... master’s degree in fisheries science from [UAF] and a bachelor’s ... from the [U.] of Montana. ... member of American Fisheries Society and Trout Unlimited. ... previously served on the Board of Forestry from 1999-2004, is appointed to a seat reserved for ... an environmental organization.” (<http://gov.alaska.gov/parnell/press-room/full-press-release.html?pr=6230>).

<sup>21</sup> Board of Forestry minutes for Aug. 2010: State Forester “Maisch explained that the State is a cooperating agency with the USFS. Moselle [ADF&G] and Clark [DNR/DoF] are state employees dedicated to implementation of the Tongass Land Management Plan, which includes the timber sale program and conservation strategy. ... The State Tongass team ... Ed Fogels coordinates the state team. The team comments on selected NEPA documents – they get a pre-scoping copy ...”

<sup>22</sup> Board of Forestry minutes for Dec. 2010: “Tongass Land Management Plan Implementation. ... Clarence Clark ... There is a state-USFS partnership that includes full involvement. Clark recounted that his main objective is to help develop economic timber sales.”

<sup>23</sup> TFR “Framework Committee Update,” 15 May 2009: “...the state allocated some significant resources to its partnership with the Forest Service on TLMP plan implementation. ... in 2008 a \$1.5 million three year capital budget appropriation was secured to further assist with the new TLMP implementation. A portion of these funds were used to hire an ADF&G habitat biologist Kyle Moselle who joined DOF forester Clarence Clark to participate in the unit pool development and related timber sale process. These staff members work side-by-side with USFS employees and are breaking new ground on how timber sale projects are conceived and designed.” Below his name, Clark sometimes signs his email messages “1 State – 1 Voice.” (The Book of One-Voice (2<sup>nd</sup> Ed.) at 108-111).

887-888.<sup>24</sup>) A list and summary of the MOUs is in *Appendix A*. The original intent of the MOUs seem sound, but now we believe the partnership they form has become a fundamental cause of failures in the NEPA process<sup>25</sup> for recent Tongass National Forest timber projects. The MOUs make the state an insider in Forest Service planning, for example allowing the STT to see pre-publication copies of FEISs and providing a surreptitious opportunity to modify the final document. With the motive and means behind the *one-voice* policy of maximizing timber production, this inside track has been used by the state to – frankly – sabotage the NEPA process, decidedly toward the end that the *one-voice* policy seeks.

This practice is absolutely counter to the letter of these MOUs, whose purpose is in part that the state, and particularly ADF&G, make positive contributions to the NEPA process.

The Forest Service and the state have similar goals of promoting logging. The State/USFS partnership involves non-transparent collaboration that circumvents the check and balance that would be provided if the state were advocating for the sustainability of the public's fish and wildlife resources, for which under the Alaska Constitution the State is the trustee. To a large degree, the two governments have become one, concerning timber projects on the Tongass. Things were different before the one-voice policy was adopted, even if even then the state's biologists may have felt they did not have the professional freedom the wildlife resources and the people of the state deserve.

## 7. Concluding remarks

The above discussions show that (1) the State / Forest Service partnership exists through a number of MOUs; (2) the State is a cooperating agency in the NEPA processes for Tongass National Forest timber projects; and (3) the full participation of ADF&G is crucial to the NEPA process because the department has vital expertise. Yet a failure of good governance is occurring. A top-down *one-voice* policy has been imposed to maximize timber production in Southeast Alaska by withholding wildlife resource information that is vital to reasoned decision making and an informed public. This agenda is executed through censorship of the state's own scientists, contrary to principles of scientific ethics and good governance.

The record also shows that, besides cultivating decisions that maximize logging in the first place, a secondary purpose of the *one-voice* agenda is to thwart litigation that could reduce the amount of logging, by keeping all contrary information out of the public record and by creating an illusion of no possibility of significant impacts.

Pervasive state government mechanisms are being used to execute the *one-voice* policy. They include the State Tongass Team, the Alaska Timber Jobs Task Force, the Board of Forestry, and willing high-level employees who aggressively pursue the *one-voice* policy. Besides the burial of expert information, another apparent outcome is an apparent effective wall between Forest Service planning teams and ADF&G's experts.<sup>26</sup>

The *one-voice* policy is more than just an inadequate regulatory mechanism. It is a deliberate, directly harmful dismantlement of both the state and federal means for regulating a particular kind of industrial endeavor that now, in Southeast Alaska after six decades of intensive logging, is very damaging indeed.

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<sup>24</sup> 11/17/14 message by STT chairman Fogel (DNR) with agenda for a meeting with "FS leadership." "Reaffirmation of partnership and MOU – we are still a cooperating agency on NEPA actions."

<sup>25</sup> NEPA's intent is to ensure thorough consideration of unbiased information and analysis, so that significant environmental impacts are considered in federal decisionmaking. NEPA is in part exercised by the publication of environmental impact statements (EISs) or environmental assessment (EAs).

<sup>26</sup> Compare Chrono.158 & .55 (from the one-voice era) to Chrono.5 & .7 (from the pre-*One-voice* era).

## Appendix A – List of MOUs surrounding the “one-voice” policy, with summaries

... with a short description of each:

- *04MU-111001-024* – This 2004 “Master” MOU with ADF&G “establish[es] a framework that recognizes the responsibilities for both agencies to cooperate in the common stewardship of fish, wildlife, and their habitats on NFS lands.” A relevant USFS duty is to involve ADF&G when developing project plans. A relevant duty of ADF&G is to “[a]ctively participate with the Forest Service **during land management planning processes** and assist in developing conservation objectives and management standards, guidelines and monitoring programs, and participate **in project-level planning and development** for fish, wildlife, rare plants and their habitats.” A mutual agreement is: “foster a united approach to fish and wildlife management, land-use management, and other mutual issues that will support the management objectives and goals of both agencies to the extent possible.” (Chrono.1, *emph. added*).
- *06MU-11100500-068* – Signed in January 2006, it was set to expire July 1, 2007 unless extended. Whether it was extended is unknown.

This is a State/USFS MOU intended “...to promote, and provide a framework for, the development of economically and technically viable timber sales on the Tongass National Forest.” The MOU was made at the Forest Service’s request for “participation from the State on a new joint timber sale review team. The State desires participation in the joint review team and the opportunity to provide specific economic and technical forestry recommendations by State personnel, including foresters and engineers.” Among other things the State agreed to “[p]rovide written comments on Tongass timber sale proposals to the Forest Service;” ... to “cooperate, consistent with respective statutory and regulatory responsibilities, in reviewing and making recommendations on proposed Tongass timber sales;” and to “strive for consensus in recommendations.” (Chrono.3, *emph. added*).

- *08MU-11100500-109* – is a 2008 Master<sup>27</sup> MOU whose purpose “is to promote cooperation between the Forest Service and the State in implementing the Tongass Land Management Plan (Forest Plan) and related environmental analyses and work associated with managing the land and resources. This MOU will establish a framework of cooperation ... in the common stewardship of fish, wildlife, and their habitats as well as the natural resources on Tongass National Forest lands ...” The State shall “[t]o the extent practical, and contingent upon other duties and funding, provide staff time and expertise to develop and evaluate various aspects of the Forest Plan implementation, including ... timber sale planning ...”; and “[w]henver appropriate; provide resource specialists ... to work on projects of mutual interest. These specialists and engineers may include fish biologists, wildlife biologists, ecologists, ... and statisticians.” (Chrono.10).

Note that in the DEIS this is referred to as a March 2009 document, which is confusing given the “08MU” naming. The Forest Service signed in 2008, and the State six months later in March 2009.

- *08MU-11100500-110* – is a 2008 State/USFS MOU for cooperation in implementing the Forest Plan “and related environmental analyses” and work associated with managing the resources of the Tongass. “The Forest Service requests the State’s participation in interagency teams, joint review teams, and resource project groups that will be involved in the implementation of the Forest Plan.” The State shall “provide staff time and expertise to develop and evaluate various aspects of the Forest Service management programs, including standards and guidelines for timber management; timber demand analysis; timber sale planning; timber harvest prescriptions, young growth treatments, implementation of timber sale plans, and other work determined by mutual agreement of the parties.” A State habitat

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<sup>27</sup> This MOU does not identify itself as a Master MOU, but is referenced as such by 09MU-11100500-030.



biologist will serve on a joint Unit Pool Review Team, which has a purpose of reviewing all Gate 1 unit pools for proposed timber sale projects or IRMPs and making a “Go – No Go” recommendation to the Tongass supervisor regarding a project. The habitat biologist “will also serve on the Tongass National Forest joint review teams (JRTs) that review, at various stages, the progress of the timber sale projects or Integrated Resource Management Plans during the Gate 2 (NEPA) process.” The state did not sign until 2009. (Chrono.11).

- *09MU-11100500-030* – is a 2009 ADF&G/USFS MOU for implementing wildlife and fisheries monitoring. As such, it is not directly involved in the planning issues discussed in these comments. It references the above “04MU” and “06MU” and another on cost sharing, as well as the 2007 “Framework for Wildlife Information Needs in Southeast Alaska,” which we describe following the last MOU. (Chrono.15).
- *10MU-11100100-017* – is and ADF&G/USFS MOU toward the common view of protecting fish resources on national forests in Alaska. Among the purposes is to work together protection of fish habitat and fish passage. (Chrono.18).
- *Framework for Wildlife Information Needs in Southeast Alaska*. This August 2007 document is referenced in the above 2009 MOU.



**From:** [Larry Edwards](#)  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Cc:** [Gabriel Scott](#)  
**Subject:** Additional signer to Greenpeace et al BoG comments  
**Date:** Friday, December 26, 2014 3:56:14 PM

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Please note the Cascadia Wildlands wishes to also sign the joint comments to the Board of Game that I submitted a few minutes ago. The signing information is:

Gabriel Scott  
Cascadia Wildlands  
Box 853  
Cordova, Ak 99574  
gscott@caswild.org

-- Larry

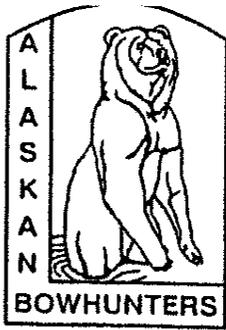
Larry Edwards  
907-747-7557  
Sitka Field Office  
Greenpeace

===== Forwarded =====

Date: Friday, December 26, 2014 (3:49 PM)  
From: Gabriel Scott <gscott@caswild.org>  
To: Larry Edwards <ledwards@greenpeace.org>  
Subj: ACT: Draft comment to Board of Game (Due today)

These are great. If it's helpful please sign Cascadia on.

-gabe



ps 1 of 3  
**The Alaskan Bowhunters Association, Inc.**

P. O. Box 220047  
 Anchorage, AK 99522  
 907-929-3600 Fax 907-334-9691  
 www.akbowhunters.com  
 akbowhunters@gci.net

**ATTN: Board of Game Comments**

ADF&G Boards Support Section

PO Box 115526

Juneau, AK 99811-5526

FAX 907-465-6094

**The Alaskan Bowhunters Association Comments for  
 Board consideration Southeast meeting  
 Juneau- January 9-13, 2015**

**Proposal #14 – DO NOT SUPPORT.** The concept of “wounded equals taken” is a very bad one. It is nearly impossible to enforce. It restricts ethical hunters and does not constrain unethical hunters. It is very worrisome that this proposal is by ADF&G. It is an example of regulation “creep”. It is a solution in search of a problem. The wolf population in SE Alaska will never be affected by the number of wolves “wounded and lost”. The number wounded and lost would be small and many wounded animals survive and while they may be lost to the hunter they are not lost to the wolf population.

**Proposal #18 – SUPPORT.** We support archery hunts in areas where there are harvestable numbers of animals but in areas where firearms hunting cannot be allowed for safety or public perception reasons. We also support closed areas where there is a high level of public viewing. It is our understanding that the maker of this proposal has been working with ADF&G in Juneau to define areas that could be hunted without impacting popular public wildlife viewing areas.

**Proposal #30 – SUPPORT.** There is no justification for requiring GPS locations of bear bait stations other than to make it easier for enforcement officers to inspect the bait sites.



## Alaska Bowhunters (2 of 3)

It would not be unreasonable to request approximate GPS coordinates for bait station permits when applied for **IF** a google earth program was available at the ADF&G offices where permit requests were being filled out. This would allow hunters requesting bait station permits to put approximate locations into the permit application.

There is a perception among bear hunters that members of ADF&G and or the AST are opposed philosophically to baiting bear. They believe that some of these permit conditions are in place simply to make bear baiting more difficult and expensive.

It would be so because of the requirement to own a GPS unit and also to make at least one trip to the bait site before placing any bait there.

**Proposal #36 – SUPPORT.** The requirement to remove all contaminated soil from a bear bait site was introduced as a discretionary permit condition by ADF&G and was not passed by the Board of Game. It is nearly impossible to remove all contaminated soil from a bait site. Even if bait is placed in a barrel the bear will pull it out of the barrel and spread it around. Not only that but bear excrement at the bait site will have some undigested bait in it that contaminates the soil. All organic material used as bait will be naturally removed by organisms including bears, birds and bacteria. There is concern that overzealous enforcement by those who may personally oppose bear baiting will result in prosecution of a hunter if for example an enforcement officer comes to the bait site after the season and digs up a little dirt with a trowel. If he then takes that dirt to a lab and on analysis finds that it has any higher fat or sugar content than surrounding soil he may charge the hunter with not removing all contaminated soil. Please note that the proposal does not ask to remove the requirement that all trash, liter, stands, barrels and other paraphernalia be removed from the bait site. We believe that is a reasonable requirement.

**Proposal #31 – SUPPORT.** This is an issue that the Alaskan Bowhunters Association has given testimony on many times in the past. We strongly oppose the “wounded equals taken” regulations that exist only in SE Alaska for bear and Unit 8 for bear and elk. The regulation was originally proposed by guides, who wanted to be able to call off a hunt if a client wounded a bear and they (the guide) wanted state support for their policy. We believe this regulation is almost impossible



## Alaska Bowhunters (3 of 3)

to enforce. It burdens ethical hunters and does not restrict unethical hunters. SE Alaska (and Unit 8) are the only places in the entire North American Continent where this regulation is imposed on hunters on public hunting grounds. We believe that the regulation should be simply eliminated (option #1 of the proposer). Option #2 of the proposer is another solution that would make enforcement more of a possibility and does not penalize ethical hunters who may have very superficially wounded an animal. However the ABA would prefer to see the regulation simply eliminated.

**Proposal #35 – SUPPORT.** Last year the Board of Game made Bowhunter education certification mandatory for all bowhunters starting in July 2016. The Alaskan Bowhunters Association was opposed to this regulation because we believed that it presented a barrier to entry level hunting and because we believed that it would be a burden on the State of Alaska ADF&G hunter information training program to have to provide courses statewide for all who wanted to hunt with archery gear. However the Board passed the regulation anyway but did not include crossbow hunters. We feel strongly that crossbow hunters are at least as needful of special education in the use of their devices. Because there are different safety considerations that are unique to crossbows and because crossbows kill with a sharp tipped projectile we think that specific crossbow education is appropriate. We have had crossbow poachers reflect poorly on conventional bowhunters.

Under no circumstances should this be construed to imply that crossbows should ever be allowed in the special archery seasons in Alaska. We want to see separate specific crossbow education for all crossbow hunters. Crossbows are legal in all general seasons in Alaska and that should provide plenty of opportunity for those wishing to use crossbows.

Thank you for considering our comments,

Jack Frost – Legislative Vice President of the Alaskan Bowhunters Association.



Submitted By  
Alexander Yeung  
Submitted On  
12/24/2014 3:58:37 PM  
Affiliation

Please vote yes on protect the Alexander Archipelago wolves and give it a chance to roam and live free in the wild also yes on update the SE Alaska deer harvest objective. Choose wisely Alaska Board of Game.



Submitted By  
Allison Ostrer  
Submitted On  
12/21/2014 5:08:35 PM  
Affiliation

Phone  
2062223344

Email  
[aostrer@hotmail.com](mailto:aostrer@hotmail.com)

Address  
15th Ave SW  
Seattle, Washington 98106-2448

I SUPPORT Proposals 13, 14 and 26. All 3 will better balance the needs of humans and wildlife. I hope you will pass them so that more non-Alaskans, like me, can come visit your state and bring tourist dollars to see beautiful wildlife.

Thank you.



Submitted By

Amy

Submitted On

12/23/2014 6:43:59 PM

Affiliation

Phone

5632996075

Email

[alynn06@aol.com](mailto:alynn06@aol.com)

Address

11603 315 st ct w

IL City, Illinois 61259

Vote YES --> protect Alexander Archipelago wolves!



Submitted By  
Beth Carter  
Submitted On  
12/23/2014 1:19:44 PM  
Affiliation

To Whom It May Concern:

I am contacting you in regards to the protection for the wolves of the Alexander Archipelago. In conjunction with the United Nations reports regarding the health and continued existence of the majority of species upon the planet, we must begin to incorporate more thoroughly environmental protections within each step of administrative services, not as an off-hand populace support effort. That is what it has taken to put wolves on the Endangered Species list. It is what has kept them on that list even this year because the civilian population insists. Environmentalists insist because we know deeply within ourselves that all life is interdependent. Spending most of our time within board rooms, buildings, or in contest with the wild world, we often opt for our own comforts. This is the basis for the environmental crisis that we developed by our own hands. We have attempted to remove ourselves from within the fabric of life, returning to dust only at a bitterly fought end. Our society demands that we fight human death at every turn with every possible tool since humans are the pinnacle of existence. This is hubris. It is just as fruitless to remove predators from the cloth. We have more respect for the eagle, but the wolf has its' own nobility as well. Even so, the eagle must be protected by law otherwise trophy hunting would ensue much as the wolf has been hunted. These predators are integral to the health and well-being of the planet, of every species . . . even ourselves though we cannot see how right now. We must build upon strengthening the wild systems of the planet, that which has been successful without our help for many an age. Protect the wolves of the Alexander Archipelago for we are of this world, and have no right to eliminate them from the planet.



Submitted By  
Brandon Emmett  
Submitted On  
12/23/2014 9:54:08 AM  
Affiliation

Phone  
1-907-328-8529

Email  
[bce Emmett@alaska.edu](mailto:bce Emmett@alaska.edu)

Address  
1299 lowbush lane  
Fairbanks, Alaska 99709

Hello,  
  
please provide for increased protection of the Alexander Archipelago wolf. The wolf is a keystone species and an integral part of any watershed dynamic. Let us not go the way of the lower 48.

Thank you for your time,

B. Emmett



Submitted By  
Cheri Pilant  
Submitted On  
12/23/2014 7:46:07 AM  
Affiliation

Phone  
402-453-5348

Email  
[cherjerjo1@aol.com](mailto:cherjerjo1@aol.com)

Address  
10607 N 50 Ave  
Omaha, Nebraska 68152

Please protect the Alexander Archipelago wolves. And YES to update SE Alaska deer harvest objectives! These requests are for proposals 13, 14 and 26. I am in support of these measures.



Submitted By  
Chris Albert  
Submitted On  
12/25/2014 6:42:07 AM  
Affiliation

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I am writing to support proposal 13 : Ketchikan area, unit 2. This proposal will take into account the numbers of illegally killed and wounded wolves when determining annual harvest limits. Currently these animals are not even taken into account when setting hunting quotas. Current research (ADFG 2013) shows actual mortality may be approaching 80% - obviously unsustainable.

Adoption of this proposal is crucial to maintaining a population of this rare wolf.

I also support proposal 14: Ketchikan area, unit 2. This proposal aims to reduce wolf harvest until updated population and harvest information becomes available. It aims to reduce human caused mortality from 30% to 20% and includes a wounded wolf in a hunter's bag limit. When managing wolf numbers it is critical to have accurate population numbers, and it only makes sense that a wounded animal be counted in the harvest.

I further support proposal 26. It is important to have a valid population number for the deer, and there is some question as to whether the current number is accurate. From 1994 to 1999 the harvest numbers had peaked and they have not since been adjusted. Proposal 26 offers a comprehensive plan to address the overharvest.



Submitted By  
Clay Baumung  
Submitted On  
12/21/2014 4:57:14 PM  
Affiliation

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It is critical that wolf numbers are not reduced to levels that threaten survival of the already dwindling population of Alexander Archipelago subspecies. Existing Alaska Department of Fish & Game (ADF&G) regulations are inadequate, allowing a harvest of 30 percent - 60 wolves per season - based upon an unsubstantiated number of wolves.

I support Proposal 13 Ketchikan Area - Unit 2.



Submitted By  
Deb Henriksen  
Submitted On  
12/24/2014 11:21:44 AM  
Affiliation

Thank you for hearing my concerns. I am a scientist and advocate for sustainability and coexistence...

Please **support** each of the following proposals because Wolves are essential to healthy ecosystems around the world. They are a Kestone Species and Apex Predator.

Please **support**...

**Proposal 13 Ketchikan Area - Unit 2.** This proposal would provide changes in wolf harvest regulations specifically for the Alexander Archipelago wolf, a distinct and rare wolf subspecies on Prince of Wales Island. The proposal would change annual harvest limits to take into account the number of wolves killed illegally as well as the number wounded, in addition to the number reported killed legally, when setting the annual harvest cap. Proposal 13 was drafted by Greenpeace, Center for Biological Diversity (CBD) and The Boat Company, the lead groups seeking Endangered Species Act protection for the Alexander Archipelago wolves

Reasons for support:

It is critical that wolf numbers are not reduced to levels that threaten survival of the already dwindling population of Alexander Archipelago subspecies. Existing Alaska Department of Fish & Game (ADF&G) regulations are inadequate, allowing a harvest of 30 percent - 60 wolves per season - based upon an unsubstantiated number of wolves.

- ADF&G derived its population estimate of 200 wolves from a "guestimate" of wolves on the island - anywhere from 150 to 250 - to determine the 60 wolf annual harvest allowance.
- Additional annual wolf mortality from poaching and wounds has been totally ignored in setting wolf harvest estimates.
- 2013 research by ADF&G shows the total mortality may actually have reached an obviously unsustainable 80 percent in some areas.
- Adoption of this proposal - and other protection measures - is crucial to maintaining a sustainable Alexander Archipelago wolf population.

Please **support**...

**Proposal 14 Ketchikan Area - Unit 2.** This proposal by the ADF&G states that a reduced harvest is appropriate until updated population and harvest information become available. It recommends the annual legal harvest number be lowered from 30 to 20 percent of the most population estimate, and that a wounded wolf will count against that hunter/trapper's bag limit.

Reasons for Support:

- This regulation will give ADF&G a better estimate of the total human-caused mortality of wolves in a season, critical to calculating a better population estimate of the sub-species.
- Alexander Archipelago wolves - or any species - cannot be properly managed without reasonably accurate population numbers. This is paramount when the regulations affect an already imperiled sub-species.
- Making hunters/trappers account for wounded/injured wolves is a logical first step in responsible management of the population.
- Adoption of this proposal - and other protection measures - is crucial to maintaining a sustainable Alexander Archipelago wolf population.

Please **support**...

**Proposal 26 for the Southeast Region.** This well-researched proposal to modify deer population and harvest objectives, or to exempt deer from the objectives entirely, is also authored by Greenpeace, CBD, and The Boat Company. As with the Alexander Archipelago wolves, ADF&G and the BoG do not have a valid population number for the deer, and therefore do not have the information necessary to set a realistic annual harvest.

Reasons for Support:

- The BoG set population objectives and harvest objectives for deer in SE Alaska in 2000, with the understanding that objectives would be reconsidered every year or two. The BoG did not then realize that the 1994 -1999 deer populations and harvest figures were at a peak. Fourteen years later the board has not reevaluated the original objectives, placing the deer population at risk.
- In 2000 the BoG believed deer in SE were a poor fit for intensive management and should have been excluded from the Intensive Management Act (IM). Deer population and harvest objectives were established only because the IM law required it.
- Proposal 26 offers a comprehensive three-step plan to address the overharvest: invalidate the population and harvest objectives, deliberate what range should be put in regulations for each objective, and decide whether to recommend to the legislature that it



exempt deer in Units 1-5 from the requirement to set population and harvest objectives.

Thank you again for your attention science, and I hope the best decision is made for our wolves. That is the best decision to make for human health and our environment. Happy Holidays!



Submitted By  
Debra Beaver  
Submitted On  
12/23/2014 9:42:40 PM  
Affiliation

Proposal 13 Ketchikan Area - Unit 2

I Support Proposal 13 - All wolf deaths must be counted if the population is to be sustained. It is critical when dealing with a small population like this, to have a current and accurate count of the wolves, as well as an accurate count of all deaths whether legal or illegal or "other".

Proposal 14 Ketchikan Area - Unit 2

I Support Proposal 14 - The harvest should be lowered until a current, accurate count of the wolf population is available. This is important because this is already a small population. Wounded wolves should count toward a hunters limit as they will likely die later.

Proposal 26 for the Southeast Region

I Support Proposal 26 - Harvest numbers must be based on current, accurate data that is kept up to date. Population numbers can change quickly for a variety of environmental reasons. The current harvest objectives are very outdated and should be reevaluated.

Thank You,

Debra



Submitted By  
Dena Selby  
Submitted On  
12/21/2014 4:40:18 AM  
Affiliation  
  
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240-508-4675  
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Address  
11401 Van Brady Road  
Upper Marlboro, Maryland 20772

Please **support** each of the following proposals:

**Proposal 13 Ketchikan Area - Unit 2.** This proposal would provide changes in wolf harvest regulations specifically for the Alexander Archipelago wolf, a distinct and rare wolf subspecies on Prince of Wales Island. The proposal would change annual harvest limits to take into account the number of wolves killed illegally as well as the number wounded, in addition to the number reported killed legally, when setting the annual harvest cap. Proposal 13 was drafted by Greenpeace, Center for Biological Diversity (CBD) and The Boat Company, the lead groups seeking Endangered Species Act protection for the Alexander Archipelago wolves

Talking points:

It is critical that wolf numbers are not reduced to levels that threaten survival of the already dwindling population of Alexander Archipelago subspecies. Existing Alaska Department of Fish & Game (ADF&G) regulations are inadequate, allowing a harvest of 30 percent - 60 wolves per season - based upon an unsubstantiated number of wolves.

- ADF&G derived its population estimate of 200 wolves from a "guestimate" of wolves on the island - anywhere from 150 to 250 - to determine the 60 wolf annual harvest allowance.
- Additional annual wolf mortality from poaching and wounds has been totally ignored in setting wolf harvest estimates.
- 2013 research by ADF&G shows the total mortality may actually have reached an obviously unsustainable 80 percent in some areas.
- Adoption of this proposal - and other protection measures - is crucial to maintaining a sustainable Alexander Archipelago wolf population.

**Proposal 14 Ketchikan Area - Unit 2.** This proposal by the ADF&G states that a reduced harvest is appropriate until updated population and harvest information become available. It recommends the annual legal harvest number be lowered from 30 to 20 percent of the most population estimate, and that a wounded wolf will count against that hunter/trapper's bag limit.

Talking points:

- This regulation will give ADF&G a better estimate of the total human-caused mortality of wolves in a season, critical to calculating a better population estimate of the sub-species.



- Alexander Archipelago wolves - or any species - cannot be properly managed without reasonably accurate population numbers. This is paramount when the regulations affect an already imperiled sub-species.
- Making hunters/trappers account for wounded/injured wolves is a logical first step in responsible management of the population.
- Adoption of this proposal - and other protection measures - is crucial to maintaining a sustainable Alexander Archipelago wolf population.

**Proposal 26 for the Southeast Region.** This well-researched proposal to modify deer population and harvest objectives, or to exempt deer from the objectives entirely, is also authored by Greenpeace, CBD, and The Boat Company. As with the Alexander Archipelago wolves, ADF&G and the BoG do not have a valid population number for the deer, and therefore do not have the information necessary to set a realistic annual harvest.

Talking points:

- The BoG set population objectives and harvest objectives for deer in SE Alaska in 2000, with the understanding that objectives would be reconsidered every year or two. The BoG did not then realize that the 1994 -1999 deer populations and harvest figures were at a peak. Fourteen years later the board has not reevaluated the original objectives, placing the deer population at risk.
- In 2000 the BoG believed deer in SE were a poor fit for intensive management and should have been excluded from the Intensive Management Act (IM). Deer population and harvest objectives were established only because the IM law required it.
- Proposal 26 offers a comprehensive three-step plan to address the overharvest: invalidate the population and harvest objectives, deliberate what range should be put in regulations for each objective, and decide whether to recommend to the legislature that it exempt deer in Units 1-5 from the requirement to set population and harvest objectives.
- 
- ps although my address is in Maryland, I spend five months in Haines, AK in a house we own.
-



Submitted By  
Dolores Machart  
Submitted On  
12/24/2014 5:49:02 AM  
Affiliation  
Alaska Wildlife Alliance

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7086290188

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Address  
3178 W 115th Street  
Apt 1  
Merrionette Park, Illinois 60803

Re: Support Proposal 26 for thr Southeast Region

I support the actions outlined in Proposal 26 to protect deer from being over-harvested in the Southeast area. It has been fourteen years since the objectives have been reevaluated and the deer population is now at risk. I request that the necessary steps be taken to allow the deer population to reestablish itself in this region.



Submitted By  
Dwight Roadman  
Submitted On  
12/22/2014 4:28:15 PM  
Affiliation  
Retired teacher

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772-879-4569

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Address  
110 NW Carmelite Street  
Port Saint Lucie, Florida 34983

To Whom It May Concern,

I am writing to express, in the strongest terms, to urge you to protect the Alexander Arpelligo wolves. This is a rare species of wolf and one which deserves protection. Although I am not a resident of the Juneu area, I know that extention is permanent and these iconic animals rely on the reasonable decisions of people. Please, do not ignore these wolves.

Thank you for your consideration of my beliefs.

Sincerely,

Dwiight Roadman



Submitted By  
Elizabeth Watts  
Submitted On  
12/23/2014 3:37:37 AM  
Affiliation

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5168877590  
Email  
[elizabeth.watts@verizon.net](mailto:elizabeth.watts@verizon.net)  
Address  
16 Starks Place  
Lynbrook, New York 11563

**Proposal 13 Ketchikan Area - Unit 2.** This proposal would provide changes in wolf harvest regulations specifically for the Alexander Archipelago wolf, a distinct and rare wolf subspecies on Prince of Wales Island. The proposal would change annual harvest limits to take into account the number of wolves killed illegally as well as the number wounded, in addition to the number reported killed legally, when setting the annual harvest cap. Proposal 13 was drafted by Greenpeace, Center for Biological Diversity (CBD) and The Boat Company, the lead groups seeking Endangered Species Act protection for the Alexander Archipelago wolves

Talking points:

It is critical that wolf numbers are not reduced to levels that threaten survival of the already dwindling population of Alexander Archipelago subspecies. Existing Alaska Department of Fish & Game (ADF&G) regulations are inadequate, allowing a harvest of 30 percent - 60 wolves per season - based upon an unsubstantiated number of wolves.

- ADF&G derived its population estimate of 200 wolves from a "guestimate" of wolves on the island - anywhere from 150 to 250 - to determine the 60 wolf annual harvest allowance.
- Additional annual wolf mortality from poaching and wounds has been totally ignored in setting wolf harvest estimates.
- 2013 research by ADF&G shows the total mortality may actually have reached an obviously unsustainable 80 percent in some areas.
- Adoption of this proposal - and other protection measures - is crucial to maintaining a sustainable Alexander Archipelago wolf population.

**Proposal 14 Ketchikan Area - Unit 2.** This proposal by the ADF&G states that a reduced harvest is appropriate until updated population and harvest information become available. It recommends the annual legal harvest number be lowered from 30 to 20 percent of the most population estimate, and that a wounded wolf will count against that hunter/trapper's bag limit.

Talking points:

- This regulation will give ADF&G a better estimate of the total human-caused mortality of wolves in a season, critical to calculating a better population estimate of the sub-species.
- Alexander Archipelago wolves - or any species - cannot be properly managed without reasonably accurate population numbers. This is paramount when the regulations affect an already imperiled sub-species.



- Making hunters/trappers account for wounded/injured wolves is a logical first step in responsible management of the population.
- Adoption of this proposal - and other protection measures - is crucial to maintaining a sustainable Alexander Archipelago wolf population.

**Proposal 26 for the Southeast Region.** This well-researched proposal to modify deer population and harvest objectives, or to exempt deer from the objectives entirely, is also authored by Greenpeace, CBD, and The Boat Company. As with the Alexander Archipelago wolves, ADF&G and the BoG do not have a valid population number for the deer, and therefore do not have the information necessary to set a realistic annual harvest.

Talking points:

- The BoG set population objectives and harvest objectives for deer in SE Alaska in 2000, with the understanding that objectives would be reconsidered every year or two. The BoG did not then realize that the 1994 -1999 deer populations and harvest figures were at a peak. Fourteen years later the board has not reevaluated the original objectives, placing the deer population at risk.
- In 2000 the BoG believed deer in SE were a poor fit for intensive management and should have been excluded from the Intensive Management Act (IM). Deer population and harvest objectives were established only because the IM law required it.
- Proposal 26 offers a comprehensive three-step plan to address the overharvest: invalidate the population and harvest objectives, deliberate what range should be put in regulations for each objective, and decide whether to recommend to the legislature that it exempt deer in Units 1-5 from the requirement to set population and harvest objectives.



Submitted By  
Erin Barca  
Submitted On  
12/23/2014 12:06:01 PM  
Affiliation

\*Support Proposal 13 Ketchikan Area - Unit 2.

It is critical that wolf numbers are not reduced to levels that threaten survival of the already dwindling population of the Alexander Archipelago subspecies. Existing Alaska Department of Fish & Game (ADF&G) regulations are inadequate, allowing the killing of 30 percent - 60 wolves per season - based upon an unsubstantiated number of wolves. Sport-killing should be outlawed. These wolves are rare and the species is self-regulating. There is no rational, science-based argument for indiscriminate killing.

This subspecies is isolated from other wolf populations; even the Alexander Archipelago wolves living on Prince of Wales Island appear to be a distinct population segment of the Alexander Archipelago wolf. In 2010 the Alaska Department of Fish & Game's own estimate suggested that the number of wolves there had dropped from more than 300 to about 150. Over half of the old-growth forests in the wolves' habitat have already been destroyed, and another 30% could be gone within the next 20 years.

Worse, ADF&G derived this population estimate of 200 wolves from a "guestimate" of wolves on the island - anywhere from 150 to 250 - to determine the 60 wolf annual killing allowance.

Additional annual wolf mortality from poaching and wounds has been totally ignored in setting wolf killing estimates. Studies have shown that as many as half of the wolves killed in the Tongass National Forest are killed illegally.

2013 research by ADF&G shows the total mortality may actually have reached an obviously unsustainable 80 percent in some areas.

Adoption of this proposal - and other protection measures - is crucial to maintaining a sustainable Alexander Archipelago wolf population.

\*Support Proposal 14 Ketchikan Area - Unit 2.

This regulation will give ADF&G a better estimate of the total human-caused mortality of wolves in a season, critical to calculating a better population estimate of the subspecies.

Alexander Archipelago wolves - or any species - cannot be properly managed without reasonably accurate population numbers. This is paramount when the regulations affect an already imperiled subspecies.

Making hunters/trappers account for wounded/injured wolves is a logical first step in responsible management of the population.

Adoption of this proposal - and other protection measures - is crucial to maintaining a sustainable Alexander Archipelago wolf population.

\*Support Proposal 26 for the Southeast Region.

The BoG set population objectives and hunting objectives for deer in SE Alaska in 2000, with the understanding that objectives would be reconsidered every year or two. The BoG did not then realize that the 1994 -1999 deer populations and hunting figures were at a peak. Fourteen years later the board has not reevaluated the original objectives, placing the deer population at risk.

In 2000 the BoG believed deer in SE were a poor fit for intensive management and should have been excluded from the Intensive Management Act (IM). Deer population and hunting objectives were established only because the IM law required it.

Proposal 26 offers a comprehensive three-step plan to address the overkill: invalidate the population and hunting objectives, deliberate what range should be put in regulations for each objective, and decide whether to recommend to the legislature that it exempt deer in Units 1-5 from the requirement to set population and hunting objectives.



Submitted By  
Esther Fetterhoff  
Submitted On  
12/23/2014 6:51:34 AM  
Affiliation

**I am asking the Board of Game to Vote YES to provide protections to the Alexander Archipelago wolves, and YES to update SE Alaska deer harvest objectives. Too many deer and wolves have died in vain. Please help the wolves against abuse and death for profit and greed. God creatures are not trophies.**



Submitted By  
Fran Mason  
Submitted On  
12/23/2014 9:55:33 PM  
Affiliation

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5034524145

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[piptrade@yahoo.com](mailto:piptrade@yahoo.com)

Address  
4910 45th Ave  
Portland, Oregon 97221

It is critical that wolf numbers are not reduced to levels that threaten survival of the already dwindling population of Alexander Archipelago subspecies. Existing Alaska Department of Fish & Game (ADF&G) regulations are inadequate, allowing a harvest of 30 percent - 60 wolves per season - based upon an unsubstantiated number of wolves.

Please **support** each of the following proposals:

**Proposal 13 Ketchikan Area - Unit 2.**

**Proposal 14 Ketchikan Area - Unit 2.**

**Proposal 26 for the Southeast Region.**



Submitted By

Gayle Wells

Submitted On

12/21/2014 11:37:48 PM

Affiliation

I am a resident of the United Kingdom but have a strong affiliation to wildlife which is trying to survive, despite the presence of man - particularly wolves.

I would therefore urge you to **agree** to protect the Alexander Archipelago wolves and to **update** the SE Alaska deer harvest objective. As a civilised, sentient species, mankind should respect the existence of other species, and the natural balance of nature, or we demean ourselves as a species.

Thank you



Submitted By  
James Pomeroy  
Submitted On  
12/23/2014 8:47:57 PM  
Affiliation

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San Clemente, California 92672

Members of the Board:

Support: **Proposal 13 Ketchikan Area - Unit 2**

ADF&G's numbers are inherently flawed and unsubstantiated, failing to take into account poaching and related fatalities. Wolf mortality rates may well be higher than forecasted, and in some instances may already be unsustainable in order for the population to maintain itself. This proposal should be adopted.

Support: **Proposal 14 Ketchikan Area - Unit 2**

The wolf population, in order to be sustained at healthy levels, must be properly numbered. "Guesstimates" are not acceptable. Hunters/trappers must be made to account for all killed and wounded/injured wolves. The wolf population must be more accurately assessed, and better protections (stricter limits) should be implemented at least until such time as the population numbers have been more accurately assessed. This proposal should be adopted.

Support: **Proposal 26 for the Southeast Region**

I can do no better than to quote the AWA on this matter: *The BoG set population objectives and harvest objectives for deer in SE Alaska in 2000, with the understanding that objectives would be reconsidered every year or two. The BoG did not then realize that the 1994 - 1999 deer populations and harvest figures were at a peak. Fourteen years later the board has not reevaluated the original objectives, placing the deer population at risk.*

This proposal should be adopted because the BoG's failure here is entirely unacceptable. Proposal 26 offers a solid plan to address the overharvest of deer.

Thank you for your time and consideration.



Submitted By  
jane Beyer  
Submitted On  
12/21/2014 2:50:38 PM  
Affiliation

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5038842355

Email  
[j5bey@aol.com](mailto:j5bey@aol.com)

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2075 nomad ct se  
saalem, Oregon 97306

Please protect the essential and endangered wolves on Prince of Wales island. Vote yes on measures 13 & 14. Also please vote yes on meas 26 protecting our deer population.



Submitted By  
Jessie Megginson  
Submitted On  
12/23/2014 10:32:59 AM  
Affiliation

Vote YES to provide protections to the Alexander Archipelago wolves, and YES to update SE Alaska deer harvest objectives. These wolves along with all the others will become casualties of human expansion if policies and support don't change.

#### Proposal 13 Ketchikan Area - Unit 2.

It is critical that wolf numbers are not reduced to levels that threaten survival of the already dwindling population of Alexander Archipelago subspecies. Existing Alaska Department of Fish & Game (ADF&G) regulations are inadequate, allowing a harvest of 30 percent - 60 wolves per season - based upon an unsubstantiated number of wolves. ADF&G derived its population estimate of 200 wolves from a "guesstimate" of wolves on the island - anywhere from 150 to 250 - to determine the 60 wolf annual harvest allowance. Additional annual wolf mortality from poaching and wounds has been totally ignored in setting wolf harvest estimates. 2013 research by ADF&G shows the total mortality may actually have reached an obviously unsustainable 80 percent in some areas. Adoption of this proposal - and other protection measures - is crucial to maintaining a sustainable Alexander Archipelago wolf population.

#### Proposal 14 Ketchikan Area - Unit 2.

This regulation will give ADF&G a better estimate of the total human-caused mortality of wolves in a season, critical to calculating a better population estimate of the sub-species. Alexander Archipelago wolves - or any species - cannot be properly managed without reasonably accurate population numbers. This is paramount when the regulations affect an already imperiled sub-species. Making hunters/trappers account for wounded/injured wolves is a logical first step in responsible management of the population. Adoption of this proposal - and other protection measures - is crucial to maintaining a sustainable Alexander Archipelago wolf population.

#### Proposal 26 for the Southeast Region

The BoG set population objectives and harvest objectives for deer in SE Alaska in 2000, with the understanding that objectives would be reconsidered every year or two. The BoG did not then realize that the 1994 -1999 deer populations and harvest figures were at a peak. Fourteen years later the board has not reevaluated the original objectives, placing the deer population at risk. Proposal 26 offers a comprehensive three-step plan to address the overharvest: invalidate the population and harvest objectives, deliberate what range should be put in regulations for each objective, and decide whether to recommend to the legislature that it exempt deer in Units 1-5 from the requirement to set population and harvest objectives.



Submitted By  
Jorel Cuomo  
Submitted On  
12/23/2014 11:54:55 AM  
Affiliation

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[j.cuomo@icloud.com](mailto:j.cuomo@icloud.com)

Address  
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Point Roberts, Washington 98281

I support **Proposal 13 Ketchikan Area - Unit 2 and Proposal 14 Ketchikan Area - Unit 2.**

**Both are worthwhile proposals that should be passed. Mismanagement of many species in Alaska is not acceptable and further actions should be taken to further install protections towards strengthening populations not destroying them.**



Submitted By  
Jos Bakker  
Submitted On  
12/24/2014 5:44:43 AM  
Affiliation

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Address  
PO Box 211403  
Auke Bay, Alaska 99821

Proposal 13 Ketchikan area - Unit 2

I support proposal 13

Proposal 13 is crucial for the survival of the Alexander Archipelago wolf.

--Mortality from wounding and illegal trapping and hunting should be included in the total harvest quota. In 2013 the mortality was as high as 80% in some areas. An unsustainable mortality.



Submitted By

Jude Marshall

Submitted On

12/21/2014 4:17:01 PM

Affiliation

I support proposals 13, 14 and 26. Please help preserve these animals.



Submitted By  
Judith Zarrella  
Submitted On  
12/23/2014 11:05:19 AM  
Affiliation

Please protect the endangered species of wolves and the rare wolves of the Prince of Wales Island. Without you they will become extinct. We need our wolves for many many good reasons and should never be stalked, baited, trapped and tortured for the hideous sport of trophy hunters. I cannot understand the annihilation of wolves which do not attack humans and cannot be consumed by humans. It is your RESPONSIBILITY to bring them much needed protection from the inhumane humans that are hell bent on destroying this magnificent majestic breed. Wolves are indeed essential to our ecosystems.

Thank you for your time.

Respectfully,

Judith Zarrella



Submitted By  
Ken Green  
Submitted On  
12/20/2014 11:13:31 PM  
Affiliation

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9075951643

Email  
[kennkay@arctic.net](mailto:kennkay@arctic.net)

Address  
PO Box 776  
Cooper Landing, Alaska 99572

**I support Proposal 13 Ketchikan Area - Unit 2.** This proposal will provide changes in wolf harvest regulations specifically for the Alexander Archipelago wolf, a distinct and rare wolf subspecies on Prince of Wales Island. The proposal would change annual harvest limits to take into account the number of wolves killed illegally as well as the number wounded, in addition to the number reported killed legally, when setting the annual harvest cap. Proposal 13 was drafted by Greenpeace, Center for Biological Diversity (CBD) and The Boat Company, the lead groups seeking Endangered Species Act protection for the Alexander Archipelago wolves

It is critical that wolf numbers are not reduced to levels that threaten survival of the already dwindling population of Alexander Archipelago subspecies. Existing Alaska Department of Fish & Game (ADF&G) regulations are inadequate, allowing a harvest of 30 percent - 60 wolves per season - based upon an unsubstantiated number of wolves.

- ADF&G derived its population estimate of 200 wolves from a "guestimate" of wolves on the island - anywhere from 150 to 250 - to determine the 60 wolf annual harvest allowance.
- Additional annual wolf mortality from poaching and wounds has been totally ignored in setting wolf harvest estimates.
- 2013 research by ADF&G shows the total mortality may actually have reached an obviously unsustainable 80 percent in some areas.
- Adoption of this proposal - and other protection measures - is crucial to maintaining a sustainable Alexander Archipelago wolf population.

**I support Proposal 14 Ketchikan Area - Unit 2.** This proposal by the ADF&G states that a reduced harvest is appropriate until updated population and harvest information become available. It recommends the annual legal harvest number be lowered from 30 to 20 percent of the most population estimate, and that a wounded wolf will count against that hunter/trapper's bag limit.

- This regulation will give ADF&G a better estimate of the total human-caused mortality of wolves in a season, critical to calculating a better population estimate of the sub-species.
- Alexander Archipelago wolves - or any species - cannot be properly managed without reasonably accurate population numbers. This is paramount when the regulations affect an already imperiled sub-species.
- Making hunters/trappers account for wounded/injured wolves is a logical first step in responsible management of the population.
- Adoption of this proposal - and other protection measures - is crucial to maintaining a sustainable Alexander Archipelago wolf population.

**I support Proposal 26 for the Southeast Region.** This well-researched proposal to modify deer population and harvest objectives, or to exempt deer from the objectives entirely, is also authored by Greenpeace, CBD, and The Boat Company. As with the Alexander Archipelago wolves, ADF&G and the BoG do not have a valid population number for the deer, and therefore do not have the information necessary to set a realistic annual harvest.

- The BoG set population objectives and harvest objectives for deer in SE Alaska in 2000, with the understanding that objectives would be reconsidered every year or two. The BoG did not then realize that the 1994 -1999 deer populations and harvest figures were at a peak. Fourteen years later the board has not reevaluated the original objectives, placing the deer population at risk.
- In 2000 the BoG believed deer in SE were a poor fit for intensive management and should have been excluded from the Intensive Management Act (IM). Deer population and harvest objectives were established only because the IM law required it.
- Proposal 26 offers a comprehensive three-step plan to address the overharvest: invalidate the population and harvest objectives, deliberate what range should be put in regulations for each objective, and decide whether to recommend to the legislature that it exempt deer in Units 1-5 from the requirement to set population and harvest objectives.



Submitted By  
Kersti Evans  
Submitted On  
12/23/2014 8:07:35 AM  
Affiliation  
Love for ecosystem

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Address  
4552 Del Rio Rd  
Sacramento, California 95822

I vote YES to provide protections to the Alexander Archipelago wolves, and YES to update SE Alaska deer harvest objectives! Romeo was this kind of wolf!! SAVE them!!



Submitted By

Kristina Turner

Submitted On

12/23/2014 12:45:29 PM

Affiliation

New Mexico State University, M.S., Biology

Phone

575-202-9294

Email

[kristinamturner@gmail.com](mailto:kristinamturner@gmail.com)

Address

1510 Brown Rd.

Las Cruces, New Mexico 88005-2759

I am writing in support of voting Yes in support of providing protection for Alexander Archipelago wolves & voting Yes to update South East Alaska deer harvest objectives.



Submitted By

Laura Schmid

Submitted On

12/24/2014 3:39:04 PM

Affiliation

To whom it may concern, I would like you to say yes to providing protection of the Alexander Archipelago wolves. Also yes to update SE Alaska deer harvest objectives. Thank you for your time.



Submitted By  
Laura Sneddon  
Submitted On  
12/26/2014 1:48:11 AM  
Affiliation

Dear Alaska Board of Game,

I'm writing you in support of **Proposal 13 Ketchikan Area - Unit 2, Proposal 14 Ketchikan Area - Unit 2, and Proposal 26 for the Southeast Region** for the following reasons.

**For Proposal 13:**

It is critical that wolf numbers are not reduced to levels that threaten survival of the already dwindling population of Alexander Archipelago subspecies. Existing Alaska Department of Fish & Game (ADF&G) regulations are inadequate, allowing a harvest of 30 percent - 60 wolves per season - based upon an unsubstantiated number of wolves.

**For Proposal 14:**

- Making hunters/trappers account for wounded/injured wolves is a logical first step in responsible management of the population.
- This regulation will give ADF&G a better estimate of the total human-caused mortality of wolves in a season, critical to calculating a better population estimate of the sub-species.

**For Proposal 26:**

In conjunction with getting a valid deer population number, this plan offers a comprehensive three-step plan to address the overharvest: invalidate the population and harvest objectives, deliberate what range should be put in regulations for each objective, and decide whether to recommend to the legislature that it exempt deer in Units 1-5 from the requirement to set population and harvest objectives.

thank you

Laura,

Los Gatos, CA



Submitted By

Lynn Baker

Submitted On

12/23/2014 6:41:28 AM

Affiliation

Phone

630-215-6427

Email

[teach\\_first\\_graders@yahoo.com](mailto:teach_first_graders@yahoo.com)

Address

1603 Portsmouth Avenue  
Westchester, Illinois 60154

The fish and gaming board should make every attempt to protect the Alexander Archipelago wolf on Prince of Wales Island. To many wolves are on the endangered list due to unregulated hunting for the pure joy of the hunt. These wolves have a right to be able to co-habitate with the human population without the possibility of extinction due to hunting. These hunters are not hunting the wolves for their meat but for their skins as a trophy to place on their wall. What if we turned the tables and the wolves hunted the humans for a trophy in their cave? Please consider the impact of your decisions on the Alexander Archipelago wolf on Prince of Wales Island - we must speak up for the wild life and protect them from extinction since they can not protect themselves from the hunter.



Submitted By  
Lynn Mitchell  
Submitted On  
12/26/2014 10:49:29 AM  
Affiliation  
ME as a 50 year Alaska resident

Phone  
907-745-6766  
Email  
[ldm@mtaonline.net](mailto:ldm@mtaonline.net)  
Address  
941 S Cobb St  
Palmer, Alaska 99645

**SUPPORT: Proposal 13 Ketchikan Area - Unit 2**

I support this proposal primarily for two reasons: Logic alone dictates that ALL wolves killed and/or wounded need to be considered, not just those taken legally, when setting harvest numbers. Secondly, this indigenous species of wolves needs to be maintained at sustainable levels, rather than annihilated due to lack of specific and reliable data.

**SUPPORT: Proposal 14 Ketchikan Area - Unit 2**

I support this proposal for the same reasons listed in support of Proposal 13. The proposal is based upon logic - that is, wounded animals count against harvest limits and population estimates need to be determined before setting harvest limits. Seems both rational and obvious to me.

**SUPPORT: Proposal 26 for the Southeast Region**

I support this proposal because the Board of Game has not followed through on its implied understanding that harvest numbers be re-set more frequently than every fifteen years. How can harvest quotas still be based upon year 2000 figures? Is this how our wildlife is being managed for everybody? You can't run a profitable business by only establishing budgets every 15 years, so how can you manage wildlife populations this way? I believe wildlife management needs accountability, just like any nonprofit or for-profit corporation does.



Submitted By  
Lynn Moller  
Submitted On  
12/24/2014 12:41:59 PM  
Affiliation  
Defenders of Wildlife

Phone  
3162046131

Email  
[moller.ly@gmail.com](mailto:moller.ly@gmail.com)

Address  
8918 West Meadow Park Court  
Wichita, Kansas 67202

**My concern is that the population of wolves on the Alexander Archipelego be protected and allowed to perform their natural function. Elimination of keystone species is not a reasonable course of action. The predator is an essential part of the ecosystem and should not be eliminated for convenience.**



Submitted By  
Margaret McGinnis  
Submitted On  
12/24/2014 5:26:57 PM  
Affiliation

I am writing to support the following;

Proposal 13 Ketchikan Area - Unit 2. This proposal would provide changes in wolf harvest regulations specifically for the Alexander Archipelago wolf, a distinct and rare wolf subspecies on Prince of Wales Island. The proposal would change annual harvest limits to take into account the number of wolves killed illegally as well as the number wounded, in addition to the number reported killed legally, when setting the annual harvest cap. Proposal 13 was drafted by Greenpeace, Center for Biological Diversity (CBD) and The Boat Company, the lead groups seeking Endangered Species Act protection for the Alexander Archipelago wolves

It is critical that wolf numbers are not reduced to levels that threaten survival of the already dwindling population of Alexander Archipelago subspecies. Existing Alaska Department of Fish & Game (ADF&G) regulations are inadequate, allowing a harvest of 30 percent - 60 wolves per season - based upon an unsubstantiated number of wolves.

ADF&G derived its population estimate of 200 wolves from a "guestimate" of wolves on the island - anywhere from 150 to 250 - to determine the 60 wolf annual harvest allowance.

Additional annual wolf mortality from poaching and wounds has been totally ignored in setting wolf harvest estimates.

2013 research by ADF&G shows the total mortality may actually have reached an obviously unsustainable 80 percent in some areas.

Adoption of this proposal - and other protection measures - is crucial to maintaining a sustainable Alexander Archipelago wolf population.

Proposal 14 Ketchikan Area - Unit 2. This proposal by the ADF&G states that a reduced harvest is appropriate until updated population and harvest information become available. It recommends the annual legal harvest number be lowered from 30 to 20 percent of the most population estimate, and that a wounded wolf will count against that hunter/trapper's bag limit.

This regulation will give ADF&G a better estimate of the total human-caused mortality of wolves in a season, critical to calculating a better population estimate of the sub-species.

Alexander Archipelago wolves - or any species - cannot be properly managed without reasonably accurate population numbers. This is paramount when the regulations affect an already imperiled sub-species.

Making hunters/trappers account for wounded/injured wolves is a logical first step in responsible management of the population.

Adoption of this proposal - and other protection measures - is crucial to maintaining a sustainable Alexander Archipelago wolf population.

Proposal 26 for the Southeast Region. This well-researched proposal to modify deer population and harvest objectives, or to exempt deer from the objectives entirely, is also authored by Greenpeace, CBD, and The Boat Company. As with the Alexander Archipelago wolves, ADF&G and the BoG do not have a valid population number for the deer, and therefore do not have the information necessary to set a realistic annual harvest.

The BoG set population objectives and harvest objectives for deer in SE Alaska in 2000, with the understanding that objectives would be reconsidered every year or two. The BoG did not then realize that the 1994 -1999 deer populations and harvest figures were at a peak. Fourteen years later the board has not reevaluated the original objectives, placing the deer population at risk.

In 2000 the BoG believed deer in SE were a poor fit for intensive management and should have been excluded from the Intensive Management Act (IM). Deer population and harvest objectives were established only because the IM law required it.

Proposal 26 offers a comprehensive three-step plan to address the overharvest: invalidate the population and harvest objectives, deliberate what range should be put in regulations for each objective, and decide whether to recommend to the legislature that it exempt

deer in Units 1-5 from the requirement to set population and harvest objectives.





Submitted By  
Maria Moorat  
Submitted On  
12/23/2014 5:07:19 AM  
Affiliation

I am writing to you to ask that you accept the recommendations to reduce the numbers of Alexander Archipelago Wolves to be killed in the future.

It seems that no accurate figure for the number of these wolves is available and I feel that nothing should be done to decimate the numbers further.

Please reduce the numbers to be killed. Zero would be a good figure.

I also note that the deer population is reportedly out of hand. If the wolves were allowed to do their job the deer numbers would be adjusted without recourse to hunting. Wolves would take the ageing, diseased and weak deer. The deer herds would do less damage to the woodlands.

If you look at the research that has been done in Yellowstone National Park you will see that the reintroduction of wolves has had a very beneficial effect on the flora and fauna of the park and that the rivers are now flowing in such a way that erosion has reduced.

Scientific research has shown that wolves are necessary for a balanced ecosystem.

I do not live in Alaska and you may ask what right I have to comment upon your decisions. With social media people all around the world are being made aware of how various authorities are dealing with natural habitats and wildlife. I hope you will heed the pleas to save the wolves so that our grandchildren may inherit a world full of the wonders for which we have cared.

very sincerely

Maria Moorat



Submitted By  
Marlene Fulnecky  
Submitted On  
12/24/2014 5:47:38 AM  
Affiliation

Please **support** each of the following proposals:

**Proposal 13 Ketchikan Area - Unit 2.** This proposal would provide changes in wolf harvest regulations specifically for the Alexander Archipelago wolf, a distinct and rare wolf subspecies on Prince of Wales Island. The proposal would change annual harvest limits to take into account the number of wolves killed illegally as well as the number wounded, in addition to the number reported killed legally, when setting the annual harvest cap. Proposal 13 was drafted by Greenpeace, Center for Biological Diversity (CBD) and The Boat Company, the lead groups seeking Endangered Species Act protection for the Alexander Archipelago wolves

Talking points:

It is critical that wolf numbers are not reduced to levels that threaten survival of the already dwindling population of Alexander Archipelago subspecies. Existing Alaska Department of Fish & Game (ADF&G) regulations are inadequate, allowing a harvest of 30 percent - 60 wolves per season - based upon an unsubstantiated number of wolves.

- ADF&G derived its population estimate of 200 wolves from a "guestimate" of wolves on the island - anywhere from 150 to 250 - to determine the 60 wolf annual harvest allowance.
- Additional annual wolf mortality from poaching and wounds has been totally ignored in setting wolf harvest estimates.
- 2013 research by ADF&G shows the total mortality may actually have reached an obviously unsustainable 80 percent in some areas.
- Adoption of this proposal - and other protection measures - is crucial to maintaining a sustainable Alexander Archipelago wolf population.

**Proposal 14 Ketchikan Area - Unit 2.** This proposal by the ADF&G states that a reduced harvest is appropriate until updated population and harvest information become available. It recommends the annual legal harvest number be lowered from 30 to 20 percent of the most population estimate, and that a wounded wolf will count against that hunter/trapper's bag limit.

Talking points:

- This regulation will give ADF&G a better estimate of the total human-caused mortality of wolves in a season, critical to calculating a better population estimate of the sub-species.
- Alexander Archipelago wolves - or any species - cannot be properly managed without reasonably accurate population numbers. This is paramount when the regulations affect an already imperiled sub-species.
- Making hunters/trappers account for wounded/injured wolves is a logical first step in responsible management of the population.



- Adoption of this proposal - and other protection measures - is crucial to maintaining a sustainable Alexander Archipelago wolf population.

**Proposal 26 for the Southeast Region.** This well-researched proposal to modify deer population and harvest objectives, or to exempt deer from the objectives entirely, is also authored by Greenpeace, CBD, and The Boat Company. As with the Alexander Archipelago wolves, ADF&G and the BoG do not have a valid population number for the deer, and therefore do not have the information necessary to set a realistic annual harvest.

Talking points:

- The BoG set population objectives and harvest objectives for deer in SE Alaska in 2000, with the understanding that objectives would be reconsidered every year or two. The BoG did not then realize that the 1994 -1999 deer populations and harvest figures were at a peak. Fourteen years later the board has not reevaluated the original objectives, placing the deer population at risk.
- In 2000 the BoG believed deer in SE were a poor fit for intensive management and should have been excluded from the Intensive Management Act (IM). Deer population and harvest objectives were established only because the IM law required it.
- Proposal 26 offers a comprehensive three-step plan to address the overharvest: invalidate the population and harvest objectives, deliberate what range should be put in regulations for each objective, and decide whether to recommend to the legislature that it exempt deer in Units 1-5 from the requirement to set population and harvest objectives.

Again, there are many important proposals affecting SE Alaska's wildlife in the proposal book. Please take a few minutes to review and submit comments on others.



Submitted By  
Martha Nochimson  
Submitted On  
12/23/2014 4:05:09 PM  
Affiliation

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7185434982

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[noenda@optonline.net](mailto:noenda@optonline.net)

Address  
5020 Tibbett Avenue  
Bronx, New York 10471

Please **support** each of the following proposals:

**Proposal 13 Ketchikan Area - Unit 2.** This proposal would provide changes in wolf harvest regulations specifically for the Alexander Archipelago wolf, a distinct and rare wolf subspecies on Prince of Wales Island. The proposal would change annual harvest limits to take into account the number of wolves killed illegally as well as the number wounded, in addition to the number reported killed legally, when setting the annual harvest cap. Proposal 13 was drafted by Greenpeace, Center for Biological Diversity (CBD) and The Boat Company, the lead groups seeking Endangered Species Act protection for the Alexander Archipelago wolves

**Proposal 14 Ketchikan Area - Unit 2.** This proposal by the ADF&G states that a reduced harvest is appropriate until updated population and harvest information become available. It recommends the annual legal harvest number be lowered from 30 to 20 percent of the most population estimate, and that a wounded wolf will count against that hunter/trapper's bag limit.

**Proposal 26 for the Southeast Region.** This well-researched proposal to modify deer population and harvest objectives, or to exempt deer from the objectives entirely, is also authored by Greenpeace, CBD, and The Boat Company. As with the Alexander Archipelago wolves, ADF&G and the BoG do not have a valid population number for the deer, and therefore do not have the information necessary to set a realistic annual harvest.



Submitted By

Megan Klune

Submitted On

12/23/2014 9:57:57 PM

Affiliation

I am writing in support of proposal 13 and 14

It does seem illogical and unscientific not to take into account the number of wolves that are killed illegally, or even wounded- when deciding on this "harvest cap". Apparently this is a rare subspecies of wolf, maybe they should be left alone!



Submitted By  
Melanie Cantua  
Submitted On  
12/21/2014 8:00:16 PM  
Affiliation

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6029089078

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2636 W Lodge Dr  
Phoenix, Arizona 85041

Please vote yes to protect the Alexander wolf and to update the SE Alaska deer objectives. we need Alaska's wildlife heritage preserved.



Submitted By  
Monica Abbott  
Submitted On  
12/23/2014 5:26:34 AM  
Affiliation  
US citizen

Phone  
406-458-5585

Email  
[monica53m@msn.com](mailto:monica53m@msn.com)

Address  
1390 Ponderosa Road  
Helena, Montana 59602

Please support proposals 13, 14, and 26. Wolves are important for the environment and ecosystem.



Submitted By  
Mrs. Diane Carson  
Submitted On  
12/24/2014 7:36:51 PM  
Affiliation

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720-217-4603

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P.O. Box 616,  
Longmont, Colorado 80502-0616

Please do all that you can to protect the Alexander Archipelago Wolves. These beautiful animals deserve to be protected, as they are a very important part of the natural ecology where they live. Diversity of life with the natural balance of animals is vital for a healthy wilderness population and protecting the Alexander Archipelago Wolves is critical in preserving this balance. To lose these Wolves would be a great loss to all of us, now and in the future.



Submitted By  
Natalie Williams  
Submitted On  
12/24/2014 6:32:50 AM  
Affiliation

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2538545785

Email  
[NatLaChat@comcast.net](mailto:NatLaChat@comcast.net)

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10914 SE 287th Street  
Address Line 2  
Auburn, Washington 98092

It is my sincere hope that our state of Alaska does not make the same mistakes Idaho and others are. Please accept these comments in support of all wildlife:

It is critical that wolf numbers are not reduced to levels that threaten survival of the already dwindling population of Alexander Archipelago subspecies. Existing Alaska Department of Fish & Game (ADF&G) regulations are inadequate, allowing a harvest of 30 percent - 60 wolves per season - based upon an unsubstantiated number of wolves.

- ADF&G derived its population estimate of 200 wolves from a "guestimate" of wolves on the island - anywhere from 150 to 250 - to determine the 60 wolf annual harvest allowance.
- Additional annual wolf mortality from poaching and wounds has been totally ignored in setting wolf harvest estimates.
- 2013 research by ADF&G shows the total mortality may actually have reached an obviously unsustainable 80 percent in some areas.
- Adoption of this proposal - and other protection measures - is crucial to maintaining a sustainable Alexander Archipelago wolf population.

**Proposal 14 Ketchikan Area - Unit 2.** This proposal by the ADF&G states that a reduced harvest is appropriate until updated population and harvest information become available. It recommends the annual legal harvest number be lowered from 30 to 20 percent of the most population estimate, and that a wounded wolf will count against that hunter/trapper's bag limit.

Talking points:

- This regulation will give ADF&G a better estimate of the total human-caused mortality of wolves in a season, critical to calculating a better population estimate of the sub-species.
- Alexander Archipelago wolves - or any species - cannot be properly managed without reasonably accurate population numbers. This is paramount when the regulations affect an already imperiled sub-species.
- Making hunters/trappers account for wounded/injured wolves is a logical first step in responsible management of the population.
- Adoption of this proposal - and other protection measures - is crucial to maintaining a sustainable Alexander Archipelago wolf population.



**Proposal 26 for the Southeast Region.** This well-researched proposal to modify deer population and harvest objectives, or to exempt deer from the objectives entirely, is also authored by Greenpeace, CBD, and The Boat Company. As with the Alexander Archipelago wolves, ADF&G and the BoG do not have a valid population number for the deer, and therefore do not have the information necessary to set a realistic annual harvest.

Talking points:

- The BoG set population objectives and harvest objectives for deer in SE Alaska in 2000, with the understanding that objectives would be reconsidered every year or two. The BoG did not then realize that the 1994 -1999 deer populations and harvest figures were at a peak. Fourteen years later the board has not reevaluated the original objectives, placing the deer population at risk.
- In 2000 the BoG believed deer in SE were a poor fit for intensive management and should have been excluded from the Intensive Management Act (IM). Deer population and harvest objectives were established only because the IM law required it.
- Proposal 26 offers a comprehensive three-step plan to address the overharvest: invalidate the population and harvest objectives, deliberate what range should be put in regulations for each objective, and decide whether to recommend to the legislature that it exempt deer in Units 1-5 from the requirement to set population and harvest objectives.



Submitted By

Nicci Ramsey

Submitted On

12/23/2014 10:06:17 PM

Affiliation

Support: **Proposal 13 Ketchikan Area - Unit 2, Proposal 14 Ketchikan Area - Unit 2, and Proposal 26 for the Southeast Region**



Submitted By  
Pamela Schaming  
Submitted On  
12/23/2014 4:57:39 AM  
Affiliation

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12 Sheffield Manor Ct. #202  
Silver Spring, Maryland 20904

Please vote yes to the Alexander Alapelago and the SE deer initiative



Submitted By  
Patricia O'Brien  
Submitted On  
12/22/2014 12:26:32 PM  
Affiliation  
AWA-SE chapter  
  
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(907) 789-9405  
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Address  
PO Box 35451  
Juneau, Alaska 99803

~~Proposal 13 Ketchikan Area - Unit 2 - Support as amended

This proposal would amend annual harvest limits to take into account the number of wolves killed illegally, the number wounded, and the number reported killed legally, when setting the annual harvest cap. The proposal should be amended to lower the annual harvest to 20% consistent with Proposal 14 proposed by DF&G.

Action is required to prevent wolf numbers from being reduced to levels that threaten survival of the Alexander Archipelago subspecies. Existing regulations allow a harvest of 30 percent - 60 wolves per season - based upon an unsubstantiated number of wolves.

DF&G used 200 wolves from a guess of anywhere from 150 to 250 wolves to establish the existing 60 wolf annual harvest allowance.

- Annual wolf mortality from poaching and wounds are not included in setting wolf harvest allowance.
- 2013 research by DF&G shows mortality may actually have reached 80 percent in some areas – an unsustainable mortality.
- Proposal 14 by DF&G proposes harvest be reduced from 30 to 20 percent until updated population and harvest information become available. Reducing the annual harvest level to 20% is crucial to maintaining a sustainable Alexander Archipelago wolf population. The wording of proposal 13 should be adjusted to include the lowered annual 20% take recommended by DF&G in Proposal 14 as follows:

Change the regulatory language from Proposal 13 to read: 5 AAC 92.008(1) to read: “wolves: (A) the department shall manage the take of Unit 2 wolves so that the total annual human take from all causes (reported, illegal and wounding loss) does not exceed 20% of the Department’s minimum estimate of the unit-wide fall population; and (B) a natural mortality of up to 8% is already accounted for in the 20% limit, but if the department determines that natural mortality may be exceeding that level, it shall adjust its management accordingly.

Proposal 14 Ketchikan Area - Unit 2 - Support

This proposal by the DF&G states that a reduced harvest is appropriate until updated population and harvest information become available. It recommends the annual legal harvest number be lowered from 30 to 20 percent of the most population estimate, and that a wounded wolf will count against that hunter/trapper’s bag limit. It falls short in addressing management of the wolves to include the total annual human take. Specifically illegal take is not included. If proposal 13 is not adopted, including amending it to reduce wolf harvest to 20%, I recommend proposal 14 be adopted.

This regulation will give DF&G a better estimate of the total human-caused mortality of wolves in a season, critical to calculating a better population estimate of the sub-species.

Alexander Archipelago wolves - or any species – should be managed with reasonably accurate population numbers, especially when the regulations affect an already imperiled sub-species.

Making hunters/trappers account for wounded/injured wolves will demonstrate responsible management of the population.

Adoption of this proposal (14) or adoption of proposal 13 amended to reduce wolf harvest to 20%, is crucial to maintaining a sustainable wolf population in Ketchikan Area Unit 2.

Proposal 26 for the Southeast Region. Support

This proposal to modify deer population and harvest objectives or to exempt deer from the objectives entirely should receive strong support from the BoG. It addresses the lack of valid population numbers for deer. DF&G needs reasonably accurate information to set a realistic annual harvest.

- The BoG set population objectives and harvest objectives for deer in SE Alaska in 2000, with the understanding that objectives would be reconsidered every year or two. According to audio recordings of the meeting, the BoG did not then realize that the 1994 -1999 deer populations and harvest figures were at a peak. Fourteen years later with no reevaluation, the deer population is at risk.
- In 2000 the BoG believed deer in SE were a poor fit for intensive management and should have been excluded from the Intensive Management Act (IM). Deer population and harvest objectives were established only because the IM law required it.
- Proposal 26 offers a comprehensive three-step plan to address the overharvest: invalidate the population and harvest objectives, deliberate what range should be put in regulations for each objective, and decide whether to recommend to the legislature that it exempt deer in Units 1-5 from the requirement to set population and harvest objectives.



Submitted By  
Rebecca Swanson  
Submitted On  
12/24/2014 7:50:02 AM  
Affiliation

Vote YES to provide protections to the Alexander Archipelago wolves, and YES to update SE Alaska deer harvest objectives!



Submitted By  
Samantha Hamblin  
Submitted On  
12/24/2014 5:32:30 AM  
Affiliation  
Animal Activist

Phone  
9375161536

Email  
[BreathingThroughSilver@outlook.com](mailto:BreathingThroughSilver@outlook.com)

Address  
1827 Pinecrest Drive  
Dayton, Ohio 45414

I am writing this in concern for the Alexander Archipelago Wolf of the Prince of Wales Island in the Ketchikan area. The Bible asks us to tend the Garden and keep it, and by this it also means protecting the innocent lives of animals who cannot speak for themselves. The slaughter of these beautiful creatures for game is repulsive, and it is your organization that can do something to provide them with safety. Protect life - don't end it. Let these beautiful souls continue in peace, lest we lose them all for man's own gain. I beg you to help protect the lives of the Garden, and join us in keeping these animals safe. May you have a wonderful Christmas, and a most Blessed New Year. Please let these animals have the same. God Bless.

Samantha J. Hamblin



Submitted By  
Scott Bright  
Submitted On  
12/24/2014 6:36:20 AM  
Affiliation  
TrevorFoundation.org

Phone  
9163655400

Email  
[sbright93@gmail.com](mailto:sbright93@gmail.com)

Address  
3070 Knollwood dr.  
Cameron Park, California 95682

Good morning Alaska Department Of Fish And Game Folks,

(Concerning The Alexander Archipelago Wolves)

My name is Scott Bright. I wanted to say Yes to provide protections to the Alexder Archipelago wolves, and Yes to update SE Alaska deer harvest objectives! As you know wolves play such a vital role in maintaining a healthy ecosystem for all animals. I know you know this. Thank you kindly for reading my request.

Sincerely,

Scott Bright, Founder

Trevorfoundation.org



Submitted By  
Spencer Lennard  
Submitted On  
12/20/2014 9:39:34 PM  
Affiliation  
none

Phone  
541-941-9242  
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[spencerlennard@gmail.com](mailto:spencerlennard@gmail.com)  
Address  
POB 489  
Williams, Oregon 97544

Dear decisionmakers.

I am writing from southwest Oregon as a concerned citizen regarding all of your management options for Southeast Alaska. Vast amounts of current, cutting edge and peer reviewed science demonstrates that wild ecosystems are vastly stronger with a complete compliment of flourishing apex predators. It is for this reason that I implore you to suspend all sport-hunting and lethal "control" for bears, wolves and big cats in the area you are "managing."

Sport-hunting, trapping and lethal control (against the currently abundant apex predators of Alaska) is destructive, barbaric and a huge embarrassment to the wildlife managers of Alaska.

Please end these horrible practices as soon as possible.

Sincerely,

Spencer Lennard



Submitted By  
Stephen Bartell  
Submitted On  
12/21/2014 4:37:41 PM  
Affiliation

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703-627-6961

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3208 19th Road, N.  
Arlington, Virginia 22201

Please support Propoasl 13 Ketchikan Area - Unit 2. This proposal make common sense and will provide change in wolf harvest regulations. There are estimated to be ony 200 wolves on the island and this may be crucial to maintaining a sustainable Alexandre Archipelago wold population.

Thanks for considering my views.



Submitted By  
Susan Fairweather  
Submitted On  
12/23/2014 7:14:44 AM  
Affiliation

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044 01726 75934

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[susan.fairweather@tesco.net](mailto:susan.fairweather@tesco.net)

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89 Chapel Field  
ST AUSTELL, Other 99999

### **I support Proposal 13 Ketchikan Area - Unit 2.**

It is crucial that wolf numbers are not reduced to levels that threaten survival of the already dwindling population of Alexander Archipelago subspecies. The existing permissible harvest of 60 wolves per season is based upon an unsubstantiated number of wolves. No account has been taken of wolf mortality from poaching and wounds. Research from 2013 suggested that the mortality rate may have reached 80% which is unsustainable.

Adoption of this proposal, and other protection measures, is crucial to maintaining a sustainable Alexander Archipelago wolf population.

### **I support Proposal 14 Ketchikan Area - Unit 2.**

No species can be properly managed without reasonably accurate population estimates and this is vitally important in the case of an imperilled species such as the Alexander Archipelago wolf. This proposal will allow for a more accurate estimate of human-caused wolf mortality. Hunters and trappers must be required to account for injured wolves.

The adoption of this proposal is essential to maintaining a viable population of Alexander Archipelago wolves.

### **I support Proposal 26 for the Southeast Region.**

The population objectives and harvest objectives for deer in SE Alaska, set in 2000, have not been re-evaluated even though it is now known that those populations peaked between 1994 and 1999. The Board of Game believed that deer should have been excluded from the Intensive Management Act. Proposal 26 offers the opportunity to address the overharvest and decide whether to recommend to the legislature that it exempt deer in Units 1-5 from the requirement to set population and harvest objectives.



Submitted By  
Susan Vogt  
Submitted On  
12/22/2014 4:27:59 AM  
Affiliation

~~ I fully Support Ketchikan Area - Unit 2 Proposals 13 and 14 and Southeast Region Proposal 26

Making hunters/trappers account for wounded/injured wolves is a logical first step in responsible management of the population. 2013 research by ADF&G shows the total mortality may actually have reached an obviously unsustainable 80 percent in some areas. I fully SUPPORT Proposals 13 and 14 Ketchikan Area - Unit 2 and Southeast Region 26



Submitted By  
Talbot hagood  
Submitted On  
12/24/2014 12:54:13 PM  
Affiliation

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312 N. main st.  
Clover, Virginia 24534

I urge you to support Proposal 13 Ketchikan Area Unit 2. It is critical that wolf numbers are not reduced to levels that threaten the survival of the already declining population of Alexander Archipelago subspecies. Existing ADF regulations are inadequate in allowing a harvest of 30% per season, based on an unsubstantial number of these wolves.



Submitted By

Teresa Skaggs

Submitted On

12/23/2014 8:00:54 AM

Affiliation

Phone

3174428641

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[strayswelcome@embarqmail.com](mailto:strayswelcome@embarqmail.com)

Address

500 S Baldwin St  
Bargersville, Indiana 46106

I support Proposals 13, 14 and 26. Thank you!



Submitted By  
Travis Strong  
Submitted On  
12/23/2014 10:42:36 AM  
Affiliation

I am **In Support** of the following proposals and i hope you will be too.

**Proposal 13 Ketchikan Area - Unit 2.** - It is critical that wolf numbers are not reduced to levels that threaten survival of the already dwindling population of Alexander Archipelago subspecies. Existing Alaska Department of Fish & Game (ADF&G) regulations are inadequate, allowing a harvest of 30 percent - 60 wolves per season - based upon an unsubstantiated number of wolves.

**Proposal 14 Ketchikan Area - Unit 2.** Alexander Archipelago wolves - or any species - cannot be properly managed without reasonably accurate population numbers. This is paramount when the regulations affect an already imperiled sub-species. Making hunters/trappers account for wounded/injured wolves is a logical first step in responsible management of the population.

**Proposal 26 for the Southeast Region.** - Proposal 26 offers a comprehensive three-step plan to address the overharvest: invalidate the population and harvest objectives, deliberate what range should be put in regulations for each objective, and decide whether to recommend to the legislature that it exempt deer in Units 1-5 from the requirement to set population and harvest objectives



Submitted By

Vickey Lasley

Submitted On

12/22/2014 5:15:43 PM

Affiliation

Please vote yes to protection of Alexander Archipelago wolves.



Submitted By  
Vicki Maturo  
Submitted On  
12/23/2014 5:20:41 PM  
Affiliation

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Address  
1751 Cloverfield Blvd.  
Santa Monica, California 90404

**Dear Board of Game,**

**Please Vote YES to provide protections to the Alexander Archipelago wolves, and YES to update SE Alaska deer harvest objectives!**

**Thank you,**

**Vicki Maturo**



Submitted By  
Virginia Jones  
Submitted On  
12/21/2014 5:12:53 AM  
Affiliation

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1425 N High St  
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Please provide vital protection for the Alexander Archipelago wolves by supporting proposal 13 in the Ketchikan Area Unit 2. This is a distinct and rare wolf subspecies and as such must be protected as an endangered species. You must take into account the number of wolves killed illegally and wounded. Also poaching of these wolves must be taken into account. Do not threaten the survival of an already dwindling population. Also I support proposal 14 Ketchikan area unit 2 since a species cannot be managed without reasonably accurate population numbers which we do not have. For the same reason I support proposal 26 for the Southeast Region. Currently you do not have the necessary information to set a realistic annual harvest. Signed Virginia Jones



Submitted By  
Yolanda Dela Cruz  
Submitted On  
12/26/2014 1:50:16 PM  
Affiliation

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806 West 57th Avenue  
Anchorage, Alaska 99518

To: the Board of Game members,

I strongly support proposals 13, 24 and 26 and I'm hoping these public servers vote in favor of these proposals. There are many terrible and infamous proposals that would allow the killing of wild animals without mercy or compassion. If the wild animals were killed for "subsistence" only then there would be no reason to authorize some of their savage and barbaric methods on wildlife in order to kill them indiscriminately. God made the animals according to his wish, it is wolves and bears nature to kill other animals to survive. If someone does not like wolves and bears then it's not right to blame the animals because they never asked to be created as such. I hope these public servers would make the best decisions to benefit the majority of Alaskans. The natural resources belong to all Alaskans therefore they should be preserved for future generations.



The following comments were submitted via the Online Comment Form to the Board of Game's 2015 Southeast Region Meeting, but the remarks do not confine themselves to this region.

brandi mast  
Submitted On  
12/22/2014 8:03:42 AM  
Affiliation  
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[brizzandi30@hotmail.com](mailto:brizzandi30@hotmail.com)  
Address  
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Mahomet, Illinois 61853

I stand for and support the protection for all wolves.

Craig Hiler  
Submitted On  
12/23/2014 4:49:20 AM  
Affiliation  
Phone  
9253709658  
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Please consider the proposal to reduce Alaska's wolf slaughter. The wolves are an integral part of Alaska's natural wildlife health and beauty. The 30% decimation of the wolf population is not a respectful or thoughtful manner in which to treat or control this animal. Alaska is known, visited and appreciated for its natural beauty. Please keep it natural. Thank you, Craig Hiler

Don Sackett  
Submitted On  
12/23/2014 4:47:51 AM  
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Each creature here on our planet has a vital role in the environment. Balance is key, removal of top predators leads to overpopulation and destruction of the local eco system. Just look at Yellowstones renewal after reintroducing the wolves there.

Frances Bonner  
Submitted On  
12/25/2014 6:21:43 PM  
Affiliation

Please consider strengthening protections for wolves by considering limiting the hunting of wolves including wounded and poached wolves. Thank you for your hard work and progress. Your efforts are appreciated and matter to people and wildlife.



Submitted By  
Kelly Larson  
Submitted On  
12/23/2014 4:55:03 AM  
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Creswell, Oregon 97426

Please allow the wolves of Alaska have a chance to thrive once again. They are a vital part of the environment and deserve to be left alone in the wilderness along with all of Alaska's treasured species. Human intervention will equal extinction...

Nims  
Submitted On  
12/23/2014 1:34:43 PM  
Affiliation

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Park rd  
Perth, Other 6000

Please place a ban on wolf hunting and trapping and strive to protect these beautiful creatures.

Phyllis cafagna  
Submitted On  
12/23/2014 9:55:20 AM  
Affiliation

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Save the Wolves

Robert Wolfe  
Submitted On  
12/23/2014 10:08:58 PM  
Affiliation

First of I want to say I'm not an animal rights nut. I'm a hunter just like most of you probably are. However I believe we also need to protect our endangered animals for our children to enjoy when we are long gone, it's part of our legacy. Like my mother always said leave it better than when you got there and that's what I try to do. I don't necessarily agree with the hunting of wolves at all but who am I to tell a man what he can't hunt? All I ask is that it is regulated better, take all kills into consideration, poaching and wounded included. It would be a shame to turn around someday and see that another species of majestic creatures are gone and we could have done something about it. Just think about what you're leaving behind. Thank you for the consideration.



Vicki Malick  
Submitted On  
12/24/2014 10:06:01 AM  
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Pottstown, Pennsylvania 19464

We need to do whatever we can to stop the murdering and destruction of our wildlife, especially the wolf packs in Alaska and throughout the ENTIRE country.

These horrific actions are depleting a necessary culture and animals that are sustainable to our future and environment! Keep politics and money out of the the lives of these and all animals!

There is no reason now or ever for these animals to be so cruelly crucified and terrorized as they have been in these recent years. This needs to stop, PLEASE!

Victoria Vallas  
Submitted On  
12/23/2014 6:38:23 AM  
Affiliation

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Please vote yes to save these wonderful animals. Thank you.



Submitted By  
Duane Howe  
Submitted On  
12/26/2014 10:22:23 PM  
Affiliation

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Homer, Alaska 99603

Comments on Issue 13 Unit 2  
Kitchikan Area Jan 8-13, 2012

Support Proposal 13 for the Alexander Archipelago wolf on Prince of Wales Island. Since the wolf population is not accurately known there should be no killing allowed. When the number of wolves is not known to be more than a few hundred animals it makes no sense to reduce the population any further, especially when the number of other losses such as poaching and natural mortality can be controlled.

Accurate population numbers and natural annual population losses must be arrived at before any reduction of numbers should be allowed.

Duane Howe, Wildlife biologist  
41640 Gladys Dr  
Homer, WY 99603



IN REPLY REFER TO:

## United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE  
1011 East Tudor Road  
Anchorage, Alaska 99503-6199



**DEC 03 2014**

FWS/OSM 14135.PM

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

Dear Chairman Spraker:

The Alaska Board of Game is scheduled to meet January 9-13, 2015, for deliberation on proposals concerning changes to regulations governing hunting and trapping of wildlife for the Southeast Region. We have reviewed the 38 proposals the Board will be considering at this meeting.

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

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these



Chairman Spraker

issues. Please contact George Pappas, State Subsistence Liaison, (907) 786-3822, with any questions you may have concerning this material.

Sincerely,

Eugene R. Peltola Jr.  
Assistant Regional Director  
Office of Subsistence Management

Enclosure

cc: Tim Towarak, Chair, Federal Subsistence Board  
Chuck Ardizzzone, Deputy Assistant Regional Director, Office of Subsistence Management  
George Pappas, State Subsistence Liaison, Office of Subsistence Management  
Chris McKee, Wildlife Division Chief, Office of Subsistence Management  
Kristy Tibbles, Exec Director I, Birds Fish and Game, Board Support Section,  
Alaska Department of Fish and Game  
Doug Vincent-Lang, Wildlife Division Director, Alaska Department of Fish and Game  
Jennifer Yuhas, Federal Subsistence Liaison Team Leader  
Alaska Department of Fish and Game  
Interagency Staff Committee  
Administrative Record

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**RECOMMENDATIONS  
ALASKA BOARD OF GAME PROPOSALS**

**Southeast Alaska Region  
January 9-13, 2015  
Juneau, Alaska**

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



**PROPOSALS 8 – 5 AAC 85.040. Hunting seasons and bag limits for goats.** Establish a resident drawing hunt for goats in Unit 4.

**Current Federal Regulation:**

**Unit 4-Goat**

*1 goat by State registration permit only.*

*Aug. 1 – Dec. 31*

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

**Impact to Federal subsistence users/wildlife:** The hunt is currently managed using a State registration permit. If adopted, Federally qualified users would have to apply for a drawing permit, which could impact the ability to get a permit due to competition for a set number of permits.

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

**Rationale for comment:** Federally qualified users are required to obtain a State registration permit which provides the opportunity for anyone to hunt goats on Baranof Island in Unit 4. Changing to a drawing permit would reduce the number of hunters to those who successfully draw a permit. The Baranof Island goat harvest is largely made up of Federally qualified users. Many of those Federally qualified users would lose the opportunity to take a goat with a drawing permit system. Federally qualified users also have the opportunity to hunt goats for others under the Federal designated hunter system. This opportunity would also be reduced with a drawing system. The recent management plan for goats on Baranof Island, consisting of harvest objectives by zone, has successfully reduced the harvest of goats, especially nannies, while allowing all Federally qualified users harvest opportunity. Changing this hunt to a drawing could result in a Federal registration permit being issued to continue the harvest of goats by Federally qualified users.

**PROPOSAL 14 – 5 AAC 92.008. Harvest guideline levels and 5 AAC 92.130. Restrictions to bag limit.** Reduce the harvest level of wolves in Unit 2 from 30% to 20% of the fall population and wounded wolves would count against a hunter's bag limit for the regulatory year.

**Current Federal Regulation:** There is no corresponding Federal Regulation.

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

**Impact to Federal subsistence users/wildlife:** Federally qualified users could take advantage of the higher bag limit, but increasing opportunity for non-Federally qualified users may reduce the number of deer available to Federally qualified users.

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

**Rationale for comment:** Subsistence users believe that the wolf population in Unit 2 is lower than recent years, but is at an appropriate level. Accounting for wounded animals would provide better total



mortality estimates. A 20% harvest rate would allow sufficient management flexibility to maintain wolf populations near current levels while adding a measure of conservation.

**PROPOSAL 17 – 5 AAC 85.030. Hunting seasons and bag limits for deer.** Increase the resident bag limit for deer on Lincoln, Shelter and Sullivan Islands to six deer of which the last two must be male.

**Current Federal Regulation:**

**Unit 1C – Deer**

*4 deer; however, female deer may be taken only from Sept. 15-Dec. 31      Aug. 1 – Dec. 31*

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

**Impact to Federal subsistence users/wildlife:** Federally qualified users could take advantage of the higher bag limit, but increasing opportunity for non-Federally qualified users may reduce the number of deer available to Federally qualified users.

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

**Rationale for comment:** Increasing the bag limit on these relatively small islands may increase competition for the limited number of deer.

**PROPOSAL 27 – 5 AAC 85.030. Hunting seasons and bag limits for deer.** Allow elderly and disabled hunters to start hunting deer earlier in the session in Units 1-5.

**Current Federal Regulation:** There is no corresponding Federal regulation.

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

**Impact to Federal subsistence users/wildlife:** This type of regulation may increase competition with Federally qualified users who do not meet the requirements of this proposed regulation.

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

**Rationale for comment:** The Federal Subsistence Board rejected a similar proposal (WP14-04) in the 2014 Federal wildlife regulatory cycle. The Southeast Alaska Subsistence Regional Advisory Council provided the following rationale for rejection which was accepted by the Board as justification for opposing the proposal:

- There is no conservation concern with the present deer regulations in Unit 2 that is addressed by this proposal or the Office of Subsistence Management's proposed modification.
- Determining disability has been shown to be complex and problematic, and would add an additional administrative barrier to participants because this provision would require a separate Federal subsistence hunting permit.



- Establishing a hunting season that spans two regulatory years creates complexity by requiring hunters maintain two sets of harvest tickets, and harvest reporting would be delayed by almost half a year.
- The proposal is unnecessary to provide additional opportunity as the current season provides for ample chances for residents, of any age or physical condition to either hunt for themselves or to designate others to hunt for them.

Additionally, allowing hunters qualified under this proposal to start hunting earlier would negate or diminish the Federal priority in cases where the Federal Subsistence Board has established earlier season starts for Federally qualified users.

**PROPOSAL 37 – 5 AAC 85.030. Seasons and bag limits.** In southeast Alaska, add five days at the start or end of all hunting seasons and allocate 75% of all drawing permits to residents.

**Current Federal Regulation:** There is no corresponding Federal regulation.

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

**Impact to Federal subsistence users/wildlife:** Federally qualified users could take advantage of the longer seasons, but starting seasons earlier for all residents would reduce the Federal priority in instances where Federal seasons presently start earlier.

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

**Rationale for comment:** Increasing the length of hunting seasons across the board may not be appropriate. Each season has been carefully crafted over the years to account for specific issues with the harvest of each species. Starting general hunting seasons five days earlier would negate or diminish the Federal priority in cases where the Federal Subsistence Board has established earlier season starts for Federally qualified users.