



**ALASKA BOARD OF GAME**

**Arctic & Western Region Meeting  
Bethel, AK | January 6-9, 2017**

**Public Comments**

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ATTN: Board of Game Comments  
Bethel Meeting Arctic and Western Region Jan. 6-9,2017  
Fax: 907-465-6094  
December 21, 2016

The Alaskan Bowhunters Association  
Comments to Board of Game  
December 21, 2016

**Proposal #20:** To allow use of crossbows in restricted weapons hunts. The Alaskan Bowhunters Association is **Opposed to the use of crossbows in bowhunting or archery ONLY hunts or areas.** Examples would include but not be limited to Eklutna Lake, Dalton Highway and archery only hunts for Dall sheep in 14C.

However, it appears that this request is specifically to allow use of crossbows in weapons restricted areas, which already allow use of shotguns, muzzleloaders and conventional bow hunting gear. An example would be the weapons restricted area near Portage Glacier. This seems reasonable and the ABA is **NOT Opposed** so long as a clear distinction is made between weapons restricted areas that already allow use of some firearms and archery Only areas.

Our experience has been that very few hunters choose to use crossbows in areas where firearms are also legal, while many bowhunters may choose to use conventional archery gear even in open firearm seasons.

Respectfully Submitted,  
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The Alaska Migratory Bird Co-Management Council (AMBCC) writes in support of the adoption of Proposal 157, in so far as it provides for subsistence uses of emperor geese for those villages with customary and traditional use of this essential resource.

As an initial matter, we would like to express our gratitude for the opportunity to comment on this Proposal. A significant amount of work on the part of many has gotten us to where we are discussing this proposal with tribal councils, subsistence users and our federal and state co-management partners.

Proposal 157 would amend state regulations to set hunting seasons and bag limits for emperor geese for the first time in 30 years, and would establish a customary and traditional use finding for emperor geese for certain game management units. The hunting season for emperor geese has been closed since 1986 due to low population estimates. A 2016 population model that integrated 30 years of survey data produced a population estimate of 150,000-170,000 geese; this is about twice the size than was previously known. The new data shows that the population has recovered to a harvestable level. This is something we celebrate, as our communities have an important cultural relationship with emperor geese and we traditionally hunt them for food.

The AMBCC has been actively working with our partners in pursuit of the opening of an emperor goose hunt. We collaborated with the Pacific Flyway Council to revise the Flyway Management Plan for emperor geese, with a new Plan adopted in September 2016. The revised Plan includes new harvest guidelines for a fall hunt and specifies a quota of 1,000 birds per year. The revised Plan also includes a new population objective, population monitoring method and a harvest strategy. In October 2016, a federal framework change was adopted to open a hunt of emperor geese in 2017.

We appreciate the efforts on the part of the state and federal governments to implement an emperor goose harvest program that works for Alaska Natives, which is consistent with the language Migratory Bird Treaty Act and which is consistent with state and federal laws providing for subsistence uses. State regulations should be consistent with both state and federal laws providing for subsistence uses. With that in mind, we write in support of Proposal 157, but this support is conditioned upon the inclusion of the following in the regulatory structure established:

o First, there needs to be a customary and traditional use designation for all villages with customary and traditional uses of emperor geese.

o Second, the regulations must ensure there is an equitable harvest based on seasonal distribution. It is particularly important that there be not only a spring/summer hunts but that there also be a fall/winter hunt to provide hunting opportunities throughout the migration of the geese.

o Third, registration permits should be allocated to game management units in the following regions as follows:

- Maniilaq Association 125
- Kawerak, Inc. 125
- Association of Village Council Presidents 125
- Bristol Bay 150
- Aleutian Islands 175
- Kodiak 175
- Cold Bay 125

TOTAL PERMITS 1,000

o Fourth, a special zone should be created for the lands and waters of Izembek National Wildlife Refuge and State Game Refuge that is allocated a limited number of permits (125)

o Fifth, registration permits should be issued only in villages where emperor geese will be harvested and for a limited time (the tundra swan hunt in certain units is a good example).

o Sixth and finally, there should not be an open season for non-residents.



We also ask that for practical purposes you consider the local tribes in each unit to be among the authorized entities to issue permit

**About the Alaska Migratory Bird Co-Management Council:**

In accordance with the amendment to the Migratory Bird Treaty Act which allowed for the subsistence harvest of migratory birds in Alaska during the spring and summer, one statewide and 10 regional management bodies were established. The statewide body, now known as the Alaska Migratory Bird Co-Management Council, is comprised of one federal member represented by the U.S. Fish & Wildlife Service; one State of Alaska member, represented by the Alaska Department of Fish & Game, and 10 Alaska Native members, represented by Alaska Native Organizations from across the state, known as the AMBCC Native Caucus. Each partner of the AMBCC has one vote, although the goal is to strive for consensus. The AMBCC was established to develop recommendations for subsistence harvest regulations and other issues relative to migratory bird management and conservation.

Members of the AMBCC Native Caucus are as follows:

1. Aleutian Pribilof Islands Association
2. Association of Village Council Presidents
3. Bristol Bay Native Association
4. Chugach Regional Resources Commission
5. Copper River Native Association
6. Kawerak, Inc.
7. Maniilaq Association
8. North Slope Borough
9. Sun'aq Tribe of Kodiak
10. Tanana Chiefs Conference

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December 22nd, 2016

Dear Alaska Board of Game Members,

Please find the following comments regarding proposals you will be considering during the January meeting in Bethel. 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 in line with the principles of sustained yield and result in a maximum benefit to ALL users. The APHA maintains its support of the Board's current allocative policies and believes that the well-defined, species specific, resident preferences are in the best interests of all Alaskans.

### Individual Proposal Comments

Below you will find our comments on individual proposals under your consideration for Region V. Leading up to the drafting of these comments the APHA held multiple teleconferences and invited all of its members to participate in the drafting of these comments. Our teleconferences were well attended with good representation from guides who conduct hunts in Region V. 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 were outside of the group's 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 to the table.

### Proposal 2 & 3- SUPPORT

APHA concurs with ADFG and the Western Arctic Caribou Herd Working Group and the Alaska Outdoor Council that improved caribou harvest reporting is warranted at this time. **APHA supports passing BOTH Props. 2 & 3, we see them as complimentary to one another.** We support these proposals based on their given merits and the Department's comments in support of Prop. 2.

APHA would like to suggest that accurate information on harvest and hunter effort will lead to less conflict between users and communities if the WACH herd continues to decline thus requiring very restrictive management protocols. Aside from conflict avoidance, accurate harvest information is one of the pillars of modern wildlife management. Given the large amount of effort and the significant resources that have been committed to help manage the WACH, it would seem that the lack of mandatory harvest reporting is contradictory to the stated goal of sustainable management.

### Proposal 4- OPPOSE



APHA strongly opposes Proposal 4 based on its unenforceability and the likely hood of increasing user conflicts if it was implement

*Wrong Solution:*

Prop. 4 seeks to create a massive *caribou only-controlled use area*. This controlled use area would disallow the use of airplanes for caribou hunting in units 21D,22,23,24,&26A from Tuesday-Friday to allow(ing) local villagers to have quiet hunting times and no aircraft noises." Aircraft would still be allowed at all times for hunting of all other big game animals or for transportation between communities or even low level flight seeing. Clearly caribou hunters in the region described by Prop. 4, villagers or not, will hear airplane traffic even if this proposal is passed as written. Passage of Prop 4 will not guarantee quiet hunting times."

*Lack of Conservation Basis:*

Prop. 4 discusses the WACH population decline, therefore it alludes to a conservation concern. What is not clear is exactly how the author envisions this proposal as helping the slow or reverse the decline of the WACH. The statement "local people think aircraft are part of the reason" is, in our mind, insufficient to create a sweeping controlled use area. If data were presented demonstrating a direct conservation benefit to restricting the use of aircraft as proposed, we would certainly review the information and reconsider our position. At this time we don't perceive a direct conservation benefit of Prop. 4 especially considering that human harvest has not been identified as the cause of the WACH decline.

*Conclusion:*

APHA opposes Prop. 4 because it is not a solution to the problem it purports to solve and it is not a bona fide conservation measure.

## **Proposal 8- OPPOSE**

\*\*\*\*\**Proposal #8 would illegally remove ALL non-residents from the field when there is an Intensive Management **PLAN (not program)** in place for a prey species in Region V.*\*\*\*\*\*

Proposal #8 would contravene legislative intent and should be summarily rejected.

AS 16.05.255 is clear that residents have a statutory allocation priority (AS16.05.255(d)) but that intensive management (IM) should

*....restore the abundance or productivity of identified big game prey populations as necessary to achieve human consumptive use goals of the board"*(AS16.05.255(e))

Nothing in AS 16.05.255 suggests that the "human consumptive goals of the board" may not include a non-resident allocation. Aside from the long-term human consumptive goals alluded to in AS16.05.255, the legislature had the opportunity to clarify in plain statutory language its intent to close non-resident participation during an IM program. Nowhere in Alaska statue does the legislature give any such direction. Non-resident participation and an active IM program are not mutually exclusive.

Proposal 8 should fail because it misconstrues the plain statutory language in AS 16.05.255 by suggesting there is a need to enshrine another layer resident hunter preference in times of resource shortage. The legislature and the Board of Game have done a good job describing their goals and implementing IM programs, while giving preference to Alaskan residents. The Board of Game does not need an additional layer of regulation to convey clear preference to Alaska residents in times of resource shortage. APHA supports the





legislature's intent outlined in AS16.05.255 that provides for IM and a strict resident preference for moose, caribou, deer and elk.

#### Intensive Management Population Thresholds Change:

An important aspect of how the IM population objectives are set is that they are flexible and can be changed depending on a variety of criteria. Certain areas in the state initiate IM when populations are not severely depleted but are more at a midpoint in their cycle. These areas often times have non-resident opportunity allocated even when IM is being considered. Non-residents should not be excluded from allocation schemes where the population thresholds for IM are well above population low points. Proposal 8 could have the unfortunate and unintended effect of lowering population threshold for considering IM in GMUs and Regions that have done the work to make IM a more proactive rather than a reactive management tool.

#### Non-Residents Harvest Predators While Hunting for Ungulates:

Guided non-residents harvest predators in remote areas of the state while hunting for prey species." Often times these harvest patterns can show a "net gain" where the effects of secondary predator harvest not only compensate for ungulate harvest but are a net gain where predator:prey is concern. Guided non-resident hunters can be another tool in ADFG's toolbox, especially in remote areas, where additional harvest of predators is desired. Passing a blanket exclusion on non-resident participation when IM plans are in place will take a tool out of ADFG's tool box at a time when we are trying to give ADFG more options, not less.

#### Proposals 9,10,12,13,14- Sheep Restrictions- OPPOSE

APHA maintains strong opposition to efforts to re-allocate sheep hunting opportunity without a clear conservation objective. There are 5 such proposals that will be addressed in the Region V Bethel Board of Game meeting.

#### Updated Sheep Management Plan

ADFG is currently drafting an updated sheep management plan. The need for a current sheep management plan became abundantly clear during the Sheep Working Group (SWG). APHA's comments regarding the SWG and sheep conservation issues for the 2016 statewide meeting are as follows:

*"APHA is thankful to the Department the Board and the other Stakeholders who, in good faith, supported the concept of a "Sheep Working Group" (SWG). To say this has become a challenging process is an understatement. To assert that the SWG is a waste of money or time is more a reflection on the individual or group making the assertion than on the resource in question or the value of gathering knowledgeable persons from across the state in one room to work on sheep conservation. Any consensus driven process relies on gathering a group of individuals with a willingness to compromise who have good will towards each other with some basic social skills and a open minds that consider others interests as well as one's own selfish goals. APHA entered into this group with the intention of considering any request and idea. Unfortunately a super small minority of the SWG stated their goals to see the group fail. This conflict does nothing at all to help conserve or mange sheep. APHA maintains its position that conservation measures are appropriate at this time where re-allocation, or fighting over who gets to kill the last ram, is absolutely at odds with bright future. APHA suggests that if money is to be spent on future SWG meetings the board reconvene the steering committee to select the future participants rather than allow stakeholder groups to "self-select" their representative."*

**\*\*\*\*We recommend that you fail every sheep proposal pending the release of the Departments updated "Sheep Management Plan." APHA feels strongly significant changes to sheep hunting opportunity should have a conservation basis.\*\*\*\***

#### Resident Sheep Hunter Participation Exceeds 90% in Region V:



According to the department, fully 85% of the sport hunt allocation goes to resident hunters. The sport hunting allocation does not include the federal subsistence hunts on federal lands in Region V. **Alaska resident sheep hunters already account for far in excess of 90% of the sheep hunting opportunity in Region V.** Given accurate reporting and solid analysis APHA is of the opinion that less than 5% of the total sheep hunting opportunity is currently being utilized by non-residents. Further reducing the sport hunting allocation to non-residents would be punitive and unjustified at this time.

### Proposal 11- SUPPORT

See APHA comments on Proposals 2,3,9,10,12,13 and 14- we support updated reporting of harvest and hunter effort. Management decisions are only as good as the information they are based on, it would appear that information about Region V harvest and hunter effort is below average from a statewide perspective. Passing Prop. 11 will ensure future decisions are less speculative and more factual.

### Proposal 15- SUPPORT- AMMEND to STATEWIDE

We support Prop. 15 based on input from our members that supports harvesting older age class rams. APHA also feels that this proposal will encourage hunters to "take a second look" while evaluating marginal rams. Proposal 15 should be amended to make it a statewide proposal.

#### Conservation Benefits:

The average age of sheep being harvested has been declining, on a statewide basis, for two decades. This decline in age at harvest directly correlates to hunters seeing fewer mature sheep while afield and a smaller average size of horns. Some of our members feel strongly that maintaining older rams in the population helps winters survival as the younger sheep learn how to best utilize their range from experienced bandleaders. We understand that the social benefits of having older rams in the population are unproven and anecdotal but there is little dispute that older rams are generally larger (horn size) when harvested. Harvesting rams that are less than 8 years old should be heavily discouraged based on conservation concerns and harvest quality goals. Prop 15 will help discourage sublegal take.

#### Effects on resident vs. non-residents:

APHA understands that its support of Prop. 15 could be mis-construed as supporting a restriction that disproportionately affects resident hunters. This argument would be patently false. In 2016 APHA authored and supported restricting non-resident hunters, statewide, to **one ram every four years**, regardless of legality. Our support for Prop 15 is based on the benefits of encouraging the harvest of older age class rams not on who the penalty affects the most.

The accidental or negligent harvest of a sublegal animal can have dire consequences for a hunting guide. Potential penalties include but are not limited to: fines, criminal citation, civil penalty, professional license actions (probation, suspension, revocation), points against federal concession award or reauthorization and even loss of federal concession. Any suggestion that passage of Prop. 15 puts excessive burden on residents and not non-resident or their clients would be false.

### Proposal 19- Amend and Adopt



## Discussion

Proposal 51”:

During the 2016 statewide Board of Game cycle APHA submitted the following proposal:

**PROPOSAL 51 - 5 AAC 92.010. Harvest tickets, and reports; and 92.130. Restrictions to bag limit.** Modify bag limits for nonresidents accompanied by a resident relative as follows:

5 AAC 92.130 (new subsection):

***A guide required species under AS 16.05.407(a) taken by a nonresident personally accompanied by a resident relative under AS 16.05.407(a)(2) will count as the bag limit of both the nonresident and the resident relative who accompanies the nonresident.***

5 AAC 92.010(a)(new subsection):

***A nonresident may take guide required species under AS 16.05.407(a) on behalf of a resident relative permit holder who personally accompanies the non-resident under AS 16.05.407(a)(2).***

2DK- An Unequal Benefit:

The 2DK provision is an un-equal benefit that is not enjoyed by ALL Alaskans. Most native Alaskans, for instance, do not have non-resident relatives. Many non-native Alaskan hunters do not have 2DK relatives either. Of course it goes without saying that the vast majority of non-residents do not have Alaska residents as relatives. Special youth hunts, on the other hand, provide an equal benefit to all Alaskan and non-resident children. Similarly, all residents and non-residents have an equal ability to hire a guide. 2DK allocations only benefit some Alaskans and a very, very few non-residents.

Introduction:

APHA supports taking a second look at Proposal 51” because we are concerned that the proposal, as amended, is not a fair approach to addressing concerns with 2DK non-residents. Opponents of non-resident allocation and those that are anti-hunting guide have used this restriction on non-resident allocation as an opportunity to attack APHA by characterizing our motives as anti-resident. These allegations are hurtful because they are untrue: APHA members and Alaskan hunting guides are overwhelmingly Alaska residents (89%, McDowell 2014).

APHA is not interested in furthering divisive actions or issues that are not needed to address a real concern. We are proud of our efforts to support conservation and our collaborative work with many resident hunting groups to fully fund fish and game. We are not interested in undoing past work and progress over a single Board of Game proposal. APHA submitted Proposal 51” after Board of Game members repeatedly suggested a statewide solution should be considered to address issues surrounding non-resident, second degree of kindred allocation.

Guided Non-resident Allocation:

Guided non-resident allocations benefit hunters and non-hunters alike. Economic impacts from guide spending have proven to be



significant, bringing in more than 50 million new dollars to Alaska's economy each year. Guided hunts generated a total of 78 million dollars in economic activity in 2012, half of these impacts occurred in rural Alaska. Alaska's hunting guide businesses are Alaskan owned, 89% of the active registered and master guides live in Alaska. Guided non-resident allocations result in economic and social benefits to more than just non-resident hunter or the guide. (McDowell, 2014)

#### 2DK Allocations:

A lot less is known about the value of 2DK allocations. However, it is safe to say that they are less valuable than guided non-resident allocations. It is also safe to say that there are less secondary benefits to non-hunters than with the guided non-resident allocations. Even the value of family hunting connections and ties could be questioned regarding 2DK hunts. Non-resident relatives can hunt moose, deer, elk, bison, caribou and all species of small game and waterfowl, they can even trap all of Alaska's furbearers without being within the second degree of kindred with their relatives. Non-resident relatives can even come to Alaska and hunt all of those species WITHOUT a resident relative of any kind. 2DK allocations are important but they are less valuable than guided non-resident allocations.

#### Drawing Hunt Allocations- Differences Statewide:

2DK allocations are handled differently across the state in different drawing units. Guided non-resident hunter allocations have all but evaporated in areas such as 14C sheep hunts because there is not a restriction on the number of 2DK hunters or a discreet allocation for guided non-residents. In these scenarios 2DK non-residents can be awarded all of the non-resident tags, in some hunts in some years this has happened in 14C and in other chugach sheep hunting opportunities. Some areas such as Tok give "up to" a certain number of 2DK tags. The 2DK tags in Tok are fully used every year. Kodiak caps the number of 2DK hunts island-wide, leaving the majority of non-resident opportunity for guided non-residents. Unit 4 brown bears are similar though in unit 4 2DK hunters participate in a separate drawing for the allocation. There is a need to clarify how 2DK drawing hunt opportunities are handled statewide while recognizing 2DK allocations are less valuable than guided non-resident allocations.

#### General Hunts:

Before the board passed Prop 51 as amended, one resident relative could accompany an unlimited number of non-resident 2DK hunters at one time with each person holding a sheep, bear or goat tag depending on the hunt. APHA members shared stories of seeing family groups of 3,4 and even 5 hunters in the field for sheep and brown bear hunts. Often times there would be only one resident present. Given the contentious nature of non-resident allocation and how each and every non-resident that hunted sheep or brown bears was anecdotally being attributed to hunting guides, it would seem that a statewide clarification for 2DK bag limits would be appropriate and embraced by all Alaskans.

#### Scenarios- Prop 51 Un-amended:

##### • General Hunt:

- Resident gets tag over the counter  
2DK relative hunts without drawing, bag limit combined with resident relative  
Guided non-resident gets tag over the counter

#### Non-residents Only Permit Drawing Hunt:



- Resident gets tag over the counter
- 2DK relative hunts without having to draw a tag- bag limit combined with resident relative
- Guided non-resident has to draw a tag

Resident and Non-resident Permit Draw:

- Resident has to draw
- 2DK does not apply for draw- can hunt with resident relative if drawn- bag limit combined with resident relative
- Guided non-resident- must draw a tag from non-resident pool

Scenarios- Prop 51 As Amended:

General Hunt:

- Resident gets over the counter tag
- 2DK bag limit combined with resident relative
- Guided Non-resident- Gets over the counter tag

Non-resident Only Draw:

- Resident gets over the counter tag
- 2DK must draw to hunt, competes with guided non-resident, bag limit combined with resident relative
- Guided Non-resident- must apply with legally licensed guide, competes with 2DK non-resident for opportunity

Resident and non-resident Draw:

- Resident has to draw
- 2DK must draw, competes with guided non-residents- bag limit combined with resident relative
- Guided non-resident- must draw a tag from non-resident pool, competes with 2DK non-resident

Proposed Alternative:

- Consider only applying changes to hunts managed by random draw or registration- *require 2DK relative and resident to apply as a "party."*
- Clarify 2DK use as allowing a resident to take one 2DK relative hunting at a time for one of the species in AS 15.05.407(a)
- Add back section 2 to allow 2DK to hunt without drawing in a non-resident only drawing scenario

5 AAC 92.010(a)(new subsection):

**A nonresident may take guide required species under AS 16.05.407(a) on behalf of a resident relative permit holder who personally accompanies the non-resident under AS 16.05.407(a)(2).**



## Conclusion:

Proposal 51, as amended, severely restricts 2DK hunters and their resident relatives. APHA always envisioned that there could be a restriction on 2DK while offering the benefit that a 2DK hunter would not having to draw a tag in a non-resident only drawing scenario. Guided non-resident allocation is MORE valuable than 2DK non-resident allocation. Unlike special youth hunts" 2DK opportunities offer an unequal benefit to some Alaskan residents and a very few non-resident relatives. Guided non-resident allocation in limited draw hunts has been taken over by 2DK hunters and ALL non-resident participation in general hunts is being used to justify restricting guided opportunity. We ask that the board implement our solution to this difficult and emotionally charged problem.

## Proposal 22- OPPOSE

APHA opposes this proposal based on conservation and allocation concerns. We understand that areas directly adjacent to Unit 18 are depleted with no open non-resident moose seasons. Expanding opportunity with a winter moose hunts seems unwise.

Bull moose in winter are LESS valuable to non-residents than bull moose in fall. If an expansion of non-resident opportunity is warranted, it makes sense to do so for the fall season. Bull moose are in prime physical condition in the fall, and they have not shed their antlers.

Prop. 22 seems designed to benefit a few newly arrived non-residents to the area. APHA urges you vote no on this proposal.

## Proposal 25- SUPPORT

APHA supports Prop. 25 based on the Mulchatna Caribou Herd (MCH) increasing abundance and that the current harvest levels are below what is sustainable. APHA is amenable to supporting the department's recommendation to move the proposal to the region IV meeting in 2018, where the MCH management will be discussed fully.

## Proposal 26 and 27- SUPPORT

APHA supports lengthening both the resident and non-resident season as proposed. This will have the effect of allowing the bull quota to be harvested with out emergency extensions.

Please pass Prop 27 because emergency season extensions are useless for guides and clients who have set dates that they plan on being in the field. A guide can plan a trip around an emergency extension."

## Proposal 28- OPPOSE

APHA strongly opposes Prop 28 due to the non-resident hunt already being managed under a "Registration" hunt structure (RM855). RM855 allows for the department to closely monitor non-resident take and opportunity. Given the slightly declining to stable moose population during the last decade and high bull:cow (41:100) it would appear that current management practices are working. Closing the entire non-resident moose hunt in Unit 22D and E is not warranted at this time.



### **Proposal 30- SUPPORT**

Given the fact that the department does not have a conservation concern with Prop. 30, APHA supports the additional opportunity that this proposal would provide.

### **Proposal 32- AMEND- SUPPORT**

APHA supports Prop 32 of the hunt becomes managed as a registration hunt. APHA members expressed conservation concerns with the proposed longer season. These concerns were alleviated as long as the hunter effort and harvest strictly monitored. We realize that there can be concentrations of bears the area in question with seasonal abundance of food. A registration hunt is the solution to more opportunity in a sustainable manner.

### **Proposal 35- AMEND**

APHA supports amending Prop. 35 so the wolf season in Units 24-26 is as follows:

- July 1st- April 30th

Our support for a longer wolf season is based on the departments lack of conservation concerns and the desire to keep the hunting and trapping season aligned at the end of the season.

### **Proposal 37- OPPOSE**

APHA opposes Prop. 37 due to concerns about hide and trophy quality at the beginning of August. Some of Alaska's APHA's longest serving active guides hunt for brown bears in Unit 23. These experienced guides expressed unanimous concern and opposition to harvest bears before their hides were finished shedding out.

### **Proposals 38-39- SUPPORT**

APHA supports a modest lengthening of the brown bear season in Unit 23. Though many APHA members adamantly opposed an August 1st start date based on hide quality concerns, all agreed that the bears were in generally good condition by August 20th. APHA prefers Prop. 38 but supports either Prop. 38 or 39.



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December 6, 2016



Dear Chairman & Members of the Board

The Alaska Trappers Association appreciates the opportunity to offer the following comments on proposals that you will be considering at your January 2017 Arctic and Western meeting in Bethel.

Proposal 34: We OPPOSE extension of the wolverine hunting season into summer. We suspect the survival rate for young that lose their mother this early would be low. Also, this proposal appears to benefit non-resident hunters at the possible expense of residents. We contend that hunting seasons for furbearers should closely reflect the calendar limits of trapping regulations.

Proposal 35: We OPPOSE extension of the wolf hunting season into the summer for the same reasons expressed on Proposal 34. The survival rate of pups would be significantly reduced if they lost either of their parents during the summer and it would be pretty easy to wipe out an entire family unit under the right conditions. Also, the pelts would be far from prime. This proposal also appears to benefit non-resident hunters at the possible expense of residents.

Proposal 43: While we are not enamored by the practice of pursuing furbearers with snow machines, we defer to the judgment of the Board.

We appreciate this opportunity to participate in the regulatory process.

Sincerely,

Randall L. Zarnke, president





Arctic Bird Dog Association  
PO Box 90914  
Anchorage, AK 99509

December 14, 2016

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

Chairman Ted Spraker and Board Members:

Please consider comments from the Arctic Bird Dog Association (ABDA) regarding one proposal to be addressed by the Board of Game (BOG) at its January 6-9, 2017 meeting Bethel, Alaska. Proposal 17 could affect hunting activities enjoyed by ABDA members and other bird hunters using working dogs. ABDA is affiliated with the American Kennel Club and currently has about 87 memberships, including 28 family groups and 3 corporate sponsors. Among other objectives, the association strives to promote conservation through education regarding the use of dogs for bird hunting.

**PROPOSAL 17 -5 AAC 92.990(A)(26). Definitions.** Change the definition of edible meat for game birds as follows:

“Edible meat” means, ... ; **for all game birds, the meat from the breast, back, thighs, legs, wings;** [IN THE CASE OF SMALL GAME BIRDS, EXCEPT FOR CRANES, GEESE AND SWAN, THE MEAT OF THE BREAST; IN THE CASE OF CRANES, GEESE, AND SWAN, THE MEAT OF THE BREAST AND MEAT OF THE FEMUR AND TIBIA-FIBULA (LEGS AND THIGHS);] however, “edible meat” of big game or small game birds does not include meat of the head, meat that has been damaged and made inedible by the method of taking, bones, sinew, incidental meat reasonably ....

**ABDA Comments: We oppose this proposal.** We opposed a similar proposal 5 at the March 2016 BOG meeting in Fairbanks. Though we applaud the conservation ethic of the proponent and many of our members strive to utilize all conceivably edible parts of game birds they take,



we believe the proposal fails to demonstrate a conservation concern or waste of resources. Many bird hunters salvage all small edible parts of game birds, including internal organs, but requiring all hunters to do so at all times goes too far. Some of the parts prescribed by the proponent are extremely small indeed, especially from snipe, which is also a species of game bird. Where the limit of birds taken in some western and arctic game units is at 20 or 50 birds per day, then cleaning all tiny edible parts from these birds would be unreasonable. We agree with the BOG decision to require salvage of leg meat from larger game birds like cranes, geese, and swans; however, the bag limits for these species is much smaller than for grouse, ptarmigan, snipe, and ducks. The leg and thigh meat from the larger birds can amount to considerable meat that should not be wasted.

Thank you for the opportunity to comment and the public process you uphold.

Respectfully,

A handwritten signature in black ink that reads "Tim Gallagher".

Tim Gallagher  
President



Submitted By  
Pau Atkins  
Submitted On  
10/12/2016 8:45:00 PM  
Affiliation

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9074123158

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Purposal 40 and 42 Kotzebue Area-Unit 23

When you see more bears than you do moose or caribou on every outing, then you need to implement both of these. Very few people take bears each year and with the moose and caribou populations on the decline due to predators then this needs to happen.

Two bears per year is easy, but I understand the baiting issue is more complex. There are a lot of people in my area, including me who have camps and don't want bears to associate bait with food and the destruction of our camps. However if there are rules and restrictions in place this can be prevented and it doesn't have to be long term.

Please consider passing both of these.

Thanks!



Submitted By  
Paul Atkins  
Submitted On  
10/12/2016 8:34:25 PM  
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I would like to comment on purposal 36. As a long time resident of unit 23 and a person who leaves the unit around mid May, returning the end of July, I have never been able to get the RM880 tag. This has been a big inconvenience to me and my family and those that do the same. I don't know the exact reasoning why a person has to be here in Kotzebue between those dates to receive the tag, but I'm guessing it was to cut down on trophy hunters and it is to my knowledge that the local adfg staff and biologist created it just for that fact. This is discrimination in my mind. I wrote a letter to the state several years ago with concerns on the unfairness of the RM880 permit and how it is to be obtained, but never heard a word on it or after it was sent.

As a person who depends on moose meat to feed my family every year, in a community where cost are through the roof, I need that tag or at least the opportunity to take a moose when I need it, just as the RM880 allows.

When I'm not be able to harvest a moose on the state tag (Sept 1-20) due to weather, time, etc it creates a huge deficit for me and mine. Not being able to obtain the RM880 limits my ability to take a moose when I need it. Yes I could fly back up and get the tag, but it again that creates a huge cost as flying to anywhere in rural Alaska is outrageous.

I read purposal 36, *"These restrictions substantially shortened the resident antlerless moose season and limited hunting opportunity through a registration permit hunt structure (RM880) during the months of November and December"* If I read this correctly adfg agrees and these changes are being purposed. Needs to be. If not I'm confused.

With the federal subsistence board acting and closing all caribou hunting to non-locals this year, I'm guessing moose hunting from residents that are non-locals skyrocketed this year. It will be interesting to compare the number of moose kills from the 2015 season compared to the 2016 season. I'm guessing moose kills from the latter increased dramatically. Thus less moose for us that hunt moose, but can't due to the restriction and not being able to get the RM880 tag and do so later.

Please either change the dates and allow more time to get the RM880 tag, ie May 1st -July 1st or do away with it period. It would help those of us that really need it.

Yes I could hunt on federal land and take a moose from August 1-March 31, but those areas are scattered and those boundries are not well definded.

Please take this all in consideration.

Sincerley,

Paul Atkins



# BACKCOUNTRY HUNTERS AND ANGLERS ALASKA CHAPTER

www.backcountryhunters.org/alaska\_bha



PC07  
1 of 2



December 15, 2016

**Comments to the Alaska Board of Game**  
Arctic/Western Region January 2017

**Proposal 4 and Proposal 100:** Oppose PROPOSAL 4 – 5 AAC 92.085 and PROPOSAL 100 – 5 AAC 92.085, which institute no-fly zones for caribou hunting in Units 21D, 22, 23, 24, and 26A.

These proposals restrict aircraft to ONLY Friday, Saturday, Sunday and Monday for the purpose of giving local hunters three days without aircraft noises. Weather delays with flying are commonplace in fall periods in this region, and these proposals severely limit non-local hunters and air operators when weather delays overlap “no-fly” days.

This could easily result in non-local hunters either being stranded in Kotzebue and wasting valuable hunting days or being left afield on the flip side potentially wasting meat. The former scenario will increase user conflict by forcing non-locals to wait out weather and “no-fly” days in a community where they do not feel welcome; the latter scenario places hunters and game meat in a compromising situation with meat care efficacy.

Let’s say a non-local hunter happens to hit a good weather period on the “fly-days” and accomplishes a 10 day hunt, and now that hunter has 120-lbs of caribou meat being preserved in the field. Exit strategies must be as timely as weather allows. If that hunter is struggling to preserve edible meat in the field by his last day and is forced to wait another two or three days for the next “fly-day” period, this could easily result in violations of failure to preserve edible meat. The risk of this scenario should be enough to take no action on Proposal 4 and Proposal 100.

Motorboats and airplanes are traditionally accepted modes of transportation in Alaska, and noise disruptions are a technological factor that should not be controlled by regulation. If you limit one mode of transportation, you must consider limiting other modes with equal or greater noise disturbance factors. In this case motorboat traffic is more disruptive than aircraft noise, because motorboats travel slower and direct on-the-ground hunting pressure accompanies this disruption, whereas aircraft noise last only a couple of minutes and does not accompany on-the-ground disturbances or increased hunting pressure in the immediate area.

It has been stated time and again from local native communities that aircraft and non-local hunter traffic are the cause of the herd decline and migration disruption which affects subsistence harvest, yet not one shred of scientific data or field observation supports this personal opinion. Alaska must not allow local opinion, without scientific support, to shape our hunting regulations. This proposal is a poor attempt to limit non-local hunter activity in this region, and its consequences are too great a risk for hunters’ limited field time and meat care exit strategies.

**Proposal 44:** Oppose PROPOSAL 44 – 5 AAC 92.540(9)(A) Control use area, which modifies the Noatak Controlled Use Area in GMU 23.

The Noatak River Controlled Use Area currently covers the lower 175 miles of the Noatak River from the ocean upstream to Sapun Creek, and this proposal extends that CUA by another 70 miles upstream to the Cutler River. The stated reason for this proposal is an undocumented increase in user conflict between local and non-local hunters at the head of the current CUA boundary, which claim to be reducing caribou harvest success in the fall. What will happen when local hunters still do not feel this CUA extension is enough to satisfy their needs? Further extensions of the CUA and more restrictions for non-local hunters and aircraft usage on this federal public land is the likely result, without any increase in subsistence harvest success during August and September.

The current CUA boundaries along the Noatak should be considered adequate unless increased opportunity is reasonably expected from this extension, and it will not be expected because caribou whereabouts and access to these animals decide harvest success (not airplane noise and non-local hunters). The only outcome of this proposal is to further restrict aircraft usage and non-local hunter traffic, but will not increase subsistence harvest success because water levels often prevent motorboat traffic from exploring the northern tributaries of the Noatak River upstream of Sapun Creek.

There have been zero documented reports from non-local hunters that support a user conflict dilemma between them and local hunters in the northern portions of this boundary, which causes some speculation that anecdotal accounts are grossly exaggerated and should not be allowed to influence public land access without due process of facts and data to support claims of such issues. The only way a user conflict is occurring in this area is when local hunters decide to travel and hunt upstream of the current 175-mile long CUA boundary at Sapun Creek. In that case, locals must accept public land usage and share hunting opportunities with their fellow Americans when their paths cross on state and federal public lands above the current CUA boundary. Furthermore, the 70 miles between Sapun Creek and the Cutler River is a corridor used for aircraft take-out transportation by non-local hunters and is not considered a productive hunting corridor during August and September, so "hunting success" is not being disrupted because no harvests generally occur in the proposed extension area. This proposal clearly benefits only one user group, providing an extended private hunting corridor along a major navigable federal public land waterway. If local hunters desire higher success rates for caribou in August and September, they should pursue expeditions to reach the herd further north and upstream of the Noatak River and harvest more caribou, but they should not use federal authority to prevent traditional non-local hunting activities. Access difficulties that limit local harvest success doesn't justify closing public land corridors to non-local hunting groups that need viable take-out options above Sapun Creek and below the Cutler River.

Warming weather trends are affecting hunter success in this area, not non-local hunter presence or aircraft noise. There is no evidence of frequent user conflict other than local anecdote and community gossip. There must be physical proof of user conflict before restricting the use of federal public lands, and there is no such data.

The real issue in this specific area is that caribou migration has increasingly changed in fall periods to remain for longer periods in the north within GMU 26A due to warming fall periods south of Continental Divide, which results in a recent trend of caribou being farther upstream and north beyond the CUA boundary at Sapun Creek. In order for caribou to be accessed by non-local hunters in GMU 23, a reasonable take-out option by aircraft must be allowed on the Noatak River above Sapun Creek, and the current CUA boundary is adequate. Extending this boundary will make it increasingly difficult for non-local hunters to utilize public land opportunities for hunting caribou, who also desire a float along the upper Noatak River and its tributaries. Reliable take-out options near the Noatak River are critical, since aircraft landing sites are limited on the northern tributaries upstream of Sapun Creek. Local hunters want more public land restrictions to help them reach their subsistence goals, and this a bad precedent to set because non-local hunters and aircraft are not the cause of their unfulfilled subsistence needs. Access, water levels and time of year remain the limiting factors for local hunter success because they hunt by boat and not aircraft. Local hunters are encouraged to explore lands beyond the current CUA boundary for greater hunting opportunities; but trying to restrict public land access by way of extending the CUA is unjustifiable.

Do the right thing for Alaska public land owners,



Larry Bartlett  
Alaska Backcountry Hunters & Anglers  
Executive Director  
bartlettbhaalaska@gmail.com



Submitted By  
Nancy Bale  
Submitted On  
12/22/2016 11:33:43 PM  
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Thank you for the opportunity to submit comments for the Arctic/Western Region meeting in Bethel.

I have been involved with submitting proposals and attending and speaking at Board of Game meetings for many years. During that time, I have written and presented Agenda Change Requests on two separate occasions, and have taken the time to comment upon them and to listen in on board deliberations of them. Unfortunately, based on my direct experience, I've lost faith in the accuracy and appropriateness of the ACR process.

We all agree that, because most proposal authors respect the standard submission system, ACRs should be introduced **only under special circumstances**, as when there is a conservation need, an error in a regulation, or an unforeseen effect of a regulation.

Unfortunately, the Department of Fish and Game has chosen to introduce ACRs that do not meet these criteria, and unfortunately the Board of Game has chosen to advance these to the agenda of this upcoming meeting in Bethel. I am concerned that the advancement of these ACR/proposals to the meeting is not in keeping with the original purpose of agenda changes, is a misuse of the administrative process, and can disrespect the many hundreds of citizens who, through familiarity with their regions, serve on Advisory Committees or independently offer their knowledge and interest in the topics at hand, and submit on-time proposals.

The proposals forwarded as **ACRs #5 and #6** for this meeting were considered at a special meeting on October 23, 2016. These were both brought by the Department of Fish and Game itself, and were justified using criterion #3, *an unexpected effect of a regulation*, using the argument that when the Board of Game changed the cycle of meetings from 2 to 3 years, the two IM programs that were the subject of these proposals would expire before they could be considered under the regular cycle of proposals. The use of criterion #3 to justify the introduction of these proposals, **now listed as Proposals 155 and 156**, is inappropriate and violates the purpose of the Agenda Change Process.

The Board of Game, in January of 2015, considered whether it should move from a two to a three year cycle of meetings. I both submitted comments for this proposed change and listened in to the meeting. From my direct experience listening to board deliberations at that time, I can tell you that it is disingenuous for the Department of Fish and Game to call the out-of-cycle expiration of the IM programs that are the subject of these ACR/proposals an "unexpected effect of a regulation." These IM programs are not "a regulation," in the sense of the ACR criteria, nor did either of them have an "unexpected effect."

The Board of Game, when it changed the cycle of meetings, **completely understood** that there could be some consequences of that decision. Using the ACR process to address this type of consequence is completely inappropriate. Local Advisory Committees may not even have understood that an ACR was introduced, and have been effectively eliminated from reasonable consideration of these proposals through the approved process, during a three year cycle of proposals.

I am concerned that the ACR process is deeply flawed as employed with these proposals, that are so clearly allocative, and the ACR process should not be used without more precise definitions of the criteria and more precise instructions from the department to the board. I ask that the board not consider these proposals (156 and 156) and simply let the programs described under these proposals expire. The department can continue to collect data on the relevant wildlife populations, and can introduce timely proposals under the regular cycle.

The Department of Fish and Game should use its own process accurately and appropriately. As a person who has submitted ACRs in good faith, I'm concerned that the Department of Fish and Game is sidestepping the letter of the law with these ACR/proposals.



Submitted By  
al  
Submitted On  
11/22/2016 4:06:35 PM  
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#### Proposal 1

Support, if all Alaskan users are counted in a new ANS reevaluation. Also remember there is also mixing from the Central Artic Herd.

#### Proposal 2

Do not support, we already have regulations having those who reside north of the Yukon River to register with ADF&G to hunt caribou. Which there is very little compliance to do so. What makes this any better than the current regulations? If we have no enforcement of current regulations, what is going to change?

#### Proposal 3, 11

Support, This works for the moose hunters in the area north of the Yukon, should also work for caribou. Persons residing north of Yukon hunting caribou generally, have abused the current regulation far too long. This is the only area in the State for caribou and sheep that still does not mandate harvest reports and harvest tickets. This will be great yearly data to help manage caribou population north of the Yukon.

#### Proposal 4

Do not support

Does not consider bad weather, scheduled commercial flights, emergency flights and aircraft noise will not increase or decrease caribou populations.

#### Proposals 5,6, and 7

Support, terminology should be consistence within the codify.

#### Proposal 8

Do not support, I do not believe the IM statue is only addressing human harvest as Alaskans only.

#### Proposal 15

Do not support, I do not believe the BOG has the authority to make such a regulation, that if you harvest a sublegal ram (unlawful currently) the added penalty will be this. Penalties for game violations have different commissions or committees.

#### Proposal 17

Do not support, the BOG should address what is the minimum salvage reuirements for edible portions to be salvaged. It is ok if users want to use more or salvage more than what is re uired. Also if you pass this anything that is re uired to be salvaged cannot be used for such things as trap bait. Can't have it both ways.

#### Proposal 19

Support, I am sure this was not and is the intent of the statue.

#### Proposal 34

Do not support as written. But amended. I would amend this proposal to not allow the use of steel traps and firearms after 15 March. I do support the take of wolverine starting July 15. There seems to be a lot of lactating wolverine being harvest in early spring leaving pup wolverine to succumb to the elements and starvation. If this continues will see a decline in the wolverine population in this region. Put it on your radar. Harvesting wolverine after 15 July is not bad, at least the pups are wined off.





Submitted By  
aaron  
Submitted On  
12/22/2016 10:44:39 AM  
Affiliation

Proposal #8 This proposal is counterproductive to IM goals. In some areas Nonresidents take more predators incidentally while hunting moose and caribou than all predators taken by residents combined. Eliminating these hunts would make reaching IM goals even tougher and more expensive for the State. Non-residents will not, in most cases, book hunts to these areas specifically to take predators.

Proposal # 25 I drafted this proposal and concur with ADF&G's recommendations to Defer this proposal. The management of Mulchatna caribou should be discussed as a whole rather than unit by unit.

Proposal#34 I drafted this proposal. I support the proposal because currently there is almost no opportunity currently to hunt wolverines in Unit 26. Most hunters prefer to be off the north side before the Sept 1 opener. It may be appropriate to Defer this proposal to the next meeting and discuss wolverines in all of unit 26. There is an identical proposal for the remainder of unit 26 in the next meeting.

Proposal #35 I drafted this proposal and support it with an ammendment to retain all current closure dates. I overlooked some of the curent closure dates and made a typo. The closure date should have been April 30 but some units are even later. I would not be opposed to a July 15 opener as an alternative if it makes a difference to anyone. This proposal may also be appropriate to defer to the next meeting. I have an identical proposal that addresses this exact issue in the remainig portion of GMU 25&26.



Proposal# 153 Arctic Western meeting.

Concerning the GMU 17 resident brown bear tag exemption. I just want the BOG to be aware that the reported harvest level in GMU 17 is nowhere near the actual harvest. In the areas of unit 17 accessed by the Nushagak River villagers; I believe the harvest level is at least double the reported harvest. The current attitude is to shoot at any bear any time of year. It is effectively open season year round with no limit. Shot at bears are seldom looked for. Dropped and killed in view bears are seldom legally salvaged.

If I remember correctly, maybe 5 years ago or so, at the BOG meeting it was reported that the legally reported harvest was already several times the harvest objective and the spring season had yet to occur.

The shoot at on site practice has been ongoing and increasing for the last 10 years and is now to a level of normalcy. As a result, the bears are very boat shy and now most of the "educated" bears are nocturnal.

The good news is the moose have begun recovering from the mid 2000s recession. We see some caribou in the Nushagak hills again. Soon it will be time to open a limited nonresident caribou hunt outside the 2 mile corridor.

Don Duncan  
299 Alvin Street  
Fairbanks AK 99712



Through the Chair,

Dear board members and all other interested parties;

Please allow me to give a brief introduction of myself. My name is Frank Entsminger. I am a 55 year resident of the State of Alaska, avid hunter, class A assistant guide, wildlife artist, taxidermist, and 25 year member of the Upper Tanana Fortymile AC. My wife Sue and I have lived at Mile 91 on the Tok Cutoff which is 34 miles south of Tok and 12 miles northeast of Mentasta Village for nearly 40 years.

The following are my comments and recommendations on Proposal 157 pertaining to setting customary and traditional use findings and establishing seasons and bag limits for emperor geese.

I have a special interest in these birds. As a lot younger man and prior to their closing in 1986 I had hunted these geese on Unimak Island and in various locations along the Alaska Peninsula. Like many I have waited and watched the slow population recovery of these birds, hopeful that someday we would again have a chance to hunt these magnificent birds. Assuming that the population estimates submitted are realistic I would encourage that the board adopt a season and bag limit for this valuable resource.

My recommendations differ somewhat from the Proposal 157 that is before you. In consideration of your valuable time I wish to propose the following as to how I would set the seasons and bag limits.

	Resident	Nonresident
Units 9, 10 (Unimak Is. Only), 17, 18, 22, and 23		
1 goose by registration permit only	Sept. 1—Dec. 16	<u>Nov. 16—Dec. 16</u>

Units 8, 10 (except Unimak Is.)		
1 goose by registration permit only	Oct. 8—Jan. 22	<u>Nov. 22—Jan. 22</u>

**Further amend the registration hunt to a specific quota and a specified number of days reporting requirement. If quota is reached prior to the closing date, the season will close by emergency order.**

Also add:

**Units 8-10, 17, 18, 22, and 23**

**1 goose by drawing permit only, up to 50**

<b><u>(or 100) Permits issued</u></b>	<b><u>Oct. 8—Jan. 22</u></b>	<b><u>Nov. 22—Jan. 22</u></b>
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As noted my recommendation includes two hunts by registration permit and one hunt by drawing permit. I most certainly feel that the local hunters should have a preference. Allowing residents only for the first part of the season should assure this priority, however I feel nonresident hunters need to be included in these hunts. All hunters, regardless of their zip code, contribute dollars that support wildlife management and wildlife enhancement programs such as this recovery program that brought back these geese. It is only fair that all hunters share in the harvest. Also, nonresidents most certainly will be hiring local folks to aid them in hunting which adds to the local economy.

Hunters in general need to stand united. Our hunting heritage is constantly being attacked by uneducated individuals and organizations who don't understand that hunters are the primary reason we enjoy healthy wildlife populations. If in our hunting regulations we start eliminating specific hunting groups, in this case nonresidents, who then do not have a stake in the resource, they will not be there to help fight off anti-hunters. Folks need to put aside their selfish tendencies for the long term health of the resource and to support the hunting community in its entirety. I'm not saying nonresidents need an equal harvest, but they do need at least some opportunity to harvest which my amendment includes.

The drawing permit portion of the proposal is to provide an opportunity for hunters who primarily wish to acquire a prime specimen to be preserved as a fully mounted bird. Emperor geese are one of the most strikingly beautiful waterfowl species in the entire world. They are only found in western Alaska and parts of northeastern Siberia. The birds are not fully prime until late November to early December. I predict that due to the high level of interest in these birds that the entire quota of 1000 birds would be taken early on in the season. This drawing permit hunt would allocate a small portion of the harvest to residents and nonresidents and provide a small opportunity for these user groups. Justification is the same as for nonresidents. Everyone and anyone with a legal Alaska hunting license and Alaska waterfowl stamp would be eligible to apply in this drawing.

One last tidbit of information; our area of eastern Interior went through an almost identical situation in regards to the Fortymile caribou herd. Long story short...it took decades of time and thousands and thousands of hunter dollars to bring their numbers back to a level of approximately 50,000 animals. The working group that had been formed to address the recovery effort and advise the Board of Game decided that a 1000 animal harvest quota would be appropriate if administered by using a registration permit hunt with stringent reporting requirements. The range that the caribou occupy was divided into sections with each a quota or percent of the total harvest quota. If, or when, the quota is reached in any one section, the season in that quota is closed by emergency order. The other sections remain open until their quota is reached or the season ends. This is a safeguard that prevents any one section from harvesting the entire 1000 animal quota.

The working group also decided that all user groups should be included in the harvest and they also added a small portion of the harvest for a drawing permit for youth hunters, which includes both resident and nonresident youths, 10-17 years of age.

I wish I could have been here in person to discuss this with you. Hopefully my recommendations will at least promote some healthy dialogue to this subject.



I sincerely thank you for this opportunity to comment. I want you to know that I highly respect each and every one of you for your hard work, dedication, and thoughtful consideration in these matters.

Thank you and respectfully yours,

A handwritten signature in cursive script that reads "Frank E. Entsminger".

Frank E. Entsminger

Alaskan Citizen



Submitted By  
Todd Fritze  
Submitted On  
10/29/2016 6:29:53 AM  
Affiliation

I am not in support of proposal 17. Though I do understand the want to keep things consistent with the spring subsistence season the idea of having to try and cook and eat the back of a teal or a grouse or Ptarmigan is far from appealing. In addition I feel the use of eating of internal organs is a personal one and many people do not eat them due to the high risk of things in the liver in particular.

Coming from the viewpoint of a trapper by forcing me to eat the back of a bird I have just lost a piece of valuable bait by being required to eat something that possibly has so little available meat on it that it would be a negative calorie count. As a trapper I would now be forced to come up with some other form of bait particularly for marten which tends to be the bread and butter for most Alaskan trappers.

Traditionally sport hunters have not been required to take these parts and trappers have been allowed to use them as bait. I understand the subsistence users want to see all parts utilized but this is a sport hunt season and the traditions that go with that have every right to continue to be applied as the traditions that apply in the subsistence season.



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

November 21, 2016

Ted Spraker, Chair  
Alaska Board of Game  
c/o ADF&G Boards Support  
P.O. Box 115526  
Juneau, Alaska 99811-5526  
[Dfg.bog.comments@alaska.gov](mailto:Dfg.bog.comments@alaska.gov)

Subject: Comments on proposals for January 2017 Arctic and Western Region meeting and the February 2017 Interior and Northeast Arctic meeting

Dear Mr. Spraker,

The Gates of the Arctic National Park Subsistence Resource Commission (SRC) met in Fairbanks, Alaska on November 15, 2016. The SRC reviewed five proposals that will be considered at the Arctic and Western meeting in January 2017 and one proposal for the February 2017 Interior and Northeast Arctic meeting.

**Proposal 1: Evaluate a separate amount reasonably necessary for the subsistence for the Teshekpuk Caribou Herd**

The Gates of the Arctic National Park Subsistence Resource Commission voted to take no action at this time.

**Proposal 2: Modify the hunt structure of the Western Arctic and Teshekpuk Caribou Herds**

The Gates of the Arctic National Park Subsistence Resource Commission unanimously opposed this proposal. The Alaska Department of Fish and Game (ADF&G) should not propose this regulation when they do not have the capacity to educate local hunters on how this regulation will affect them. This regulation has the potential to allow ADF&G to cite local hunters who may be unaware of the regulation. Harvest reporting has been shown to be ineffective in the past.

**Proposal 3: Remove the exception to harvest tickets and reports for caribou**

The Gates of the Arctic National Park Subsistence Resource Commission unanimously opposed this proposal. This proposal would create an undue burden on local hunters, also known as super hunters who harvest large numbers of caribou for the elders, widows, and needy in their communities. A super hunter would have to apply for multiple harvest tickets in order to document the number of caribou he or she has harvested. Harvest reporting should come from

~~members.~~ the community at large, perhaps from the tribal councils who could provide community harvest numbers.

**Proposal 4: Institute no-fly zones for caribou hunting in Units 21D, 22, 23, 24, and 26A**

The Gates of the Arctic National Park Subsistence Resource Commission unanimously opposed this proposal. This proposal is not feasible due to possible weather delays that could affect flying time.

**Proposal 11: Remove the exception to harvest tickets and reports for sheep**

The Gates of the Arctic National Park Subsistence Resource Commission unanimously opposed this proposal. The National Park Service is monitoring the Dall's sheep harvest by working with the community of Anaktuvuk Pass in order to assess harvest on Arctic Slope Regional Corporation and Nunamiut Corporation lands that fall under State regulations.

**Proposal 113: Modify the resident bag limit for Dall sheep in Units 24B, 25A, 26B, and 26C**

The Gates of the Arctic National Park Subsistence Resource Commission unanimously opposed this proposal. The federal subsistence regulation for units 24A and 24B has recently changed from any 3 sheep to 3 sheep, no more than one of which may be a ewe. The communities of Wiseman and Anaktuvuk Pass are currently under an informal self-imposed restriction on hunting ewes. Low harvest rates and local traditional practices are addressing the decline of the sheep populations.

• Thank you for the opportunity to comment.

Sincerely,

Louie Commack  
Chair

And

*For the chair*

Jack Reakoff  
Vice-Chair



Cc: NPS Alaska Regional Director  
Superintendent, Gates of the Arctic National Park and Preserve  
Governor of Alaska

**Chair:** Louie Commack, **Vice-Chair:** Jack Reakoff; **Members:** Taqulik Hepa, Pollock Simon Sr., Hugh Bifelt, Tim Fickus, and Sam Kunaknana





Submitted By  
Tom Gray  
Submitted On  
12/20/2016 1:51:24 PM  
Affiliation  
  
Phone  
907-304-2003  
Email  
[tom@akadventure.com](mailto:tom@akadventure.com)  
Address  
Box 306  
Nome, Alaska 99762

Dear Board of Game,

My name is Tom Gray and am a guide that grew up here in Nome and have lived here in the region since. I feel proposal number \_\_\_\_31\_\_\_\_ is extreme with what we know about the bears 22B.

To manage a resource we need to know the size of it and know the interest in hunting that resource. We do not know either of these.

The survey referred to in the proposal included a small part of unit 22b. It refers to an increasing population which I didn't hear when listening to Fish and Game talk about this proposal.

We have people complaining about bears tearing up camps. It seems these are smaller problem bears attracted by trash or just being immature bears that are just hungry. In this region the bulk of the complaints about bears come from 22C and 22D. If local folks had their way there wouldn't be a live bear here in unit 22.

25 years ago in 22B we would see 10-15 bears drifting a river in an evening. Today lucky to see a bear. As a guide I offered a 10 day hunt years ago and changed it to a 7 day hunt because of clients sitting around for a week after shooting their bear. Today it is getting harder and harder to get a bear for clients and am thinking about going back to the 10 hunt. I feel the bear population in 22B has been dropping for some time now. Also in 22B a new guide has just began operating in the last year. This new operation will begin to impact our bear population in the future.

Looking at moose and other resources we have not only bears feeding on them but in recent years a wolf population has flourished. I grew up in this country and never saw wolves in the past. Today we have resident wolves raising pups, in the last few years I have found 3 different wolf dens in my travels. Bears are getting the blame for additional impacts these wolves are doing to our moose and musk ox recourses.

Today a person can shoot a sport bear or state subsistence bear or fed subsistence bear. In the last 10 years one state subsistence bear has been taken in 22A.

We need to be careful of what we offer, there is a potential of killing off a lot of bears with the locals and outsiders hunting our 22B system.

2006-2015 in 22A, 11 people took advantage of 2 bears a year, this is off the road system and hard to get to.

During this time there were no real impacts to the bear population.

22B is has a different breed of hunters than those in 22A. There is a big potential of hunters making big negative impacts to the bear population in 22B.

I sit on the Northern Norton Sound Fish and Game Advisory Board. Every year we vote on the blessing of taking away the 25 dollar fee for a grizzly bear permit. We have no idea of how many hunters are interested in hunting grizzly bears other than the bears actually shot. I think we need a permit like moose for bear hunting. This will give us an idea of the number of hunters interested in bear hunting.

Again

We have no idea of the size of bear resource

I feel the bear population has been declining for some time now

We have no idea of number of hunters

The majority of bear problems with camps are in 22C & 22D

Impacts of other predator's bears are blamed for (wolves)

The 2015 bear study doesn't tell the true 22b bear resource

22B has a aggressive breed of hunters that could lead to big impacts

Thanks

Tom Gray





Submitted By  
Chris Harper  
Submitted On  
12/22/2016 11:34:10 AM  
Affiliation

Dear Board of Game,

I write you with regard to the several proposals for limiting nonresidents to 10%, 12%, or even 25% of sheep permits in region V. These proposals only serve to increase the regulatory burden of the Board of Game (creating draws, sepecial registrations, etc.) while having negligible effect in the real world.

Contained in the ADF&G response to these proposals, it is stated that "nonresident sheep hunters accounted for an average of 15% of the sheep hunters in Region V between RY2011 and RY2015 with an average of 4 nonresidents participating annually." What do the authors of these proposals desire? A reduction to 3 nonresidents annually? 2 nonresidents annually? We are talking about a reduction of 1, possibly 2 hunters a year! This will obviously not have any significant impact on Dall Sheep hunting opportunity.

With the lack of any real conservation basis and in consideration of wasting your own time, I ask that you do not pass these proposals.

Chris Harper



Submitted By  
Stuart Johnson  
Submitted On  
12/21/2016 4:02:54 PM  
Affiliation

First of all thank you for your time.

I would like to voice my support of the recommendation to abolish the 2016-2017 proposal to the "Miscellaneous" regulations that will require "Brown bears, mountain goats, and sheep taken by nonresidents that are personally accompanied by resident relatives within the second-degree of kindred will count towards the bag limit of both the resident relative and the nonresident. Implementation of this is expected to occur between now and July 1, 2018, the exact implementation date will be noticed in the hunting regulations and other materials." I would like to see this revision retracted in its entirety due to the negative impact it has on the opportunities that should be provided to the residents of this state. The proposal as written currently is beneficial only to the guiding community, not all residents of the state of Alaska.

If this proposal cannot be abolished or retracted, I would like to recommend the following verbage be added prior to implementation "Also, any game harvested by a nonresident hunting under the direction of a guide or assistent guide shall count towards the bag limit of both the nonresident and guide or assistent guide."

Best Regards,  
Stuart Johnson



Douglas Malone

Comments to the Alaska Board of Game

Arctic/ Western Region Proposals

December 21, 2016

Board of Game members:

Thanks for your time, I appreciate the opportunity to speak and participate in this process. I am Douglas Malone, from Homer, am proud to serve on the local AC, and hunt statewide. The following comments represent my personal opinion on the issues before you this 2017 cycle.

SUPPORT: Proposals 2,3,8,9,10,11,12,19,155

OPPOSE: Proposals 4,25, 41

I am, generally speaking, in support of Intensive Management to maximize our prey species statewide. **Proposal 155** (renew/modify Unit 15C IM plan) came up quickly as an ACR 5, for “unforeseen (forgotten) consequence” of changing to 3 year cycle. I would however suggest amending the proposed language in AAC 92.118c2C as outlined in Proposal 155 to something a bit softer like “...determined that repopulation sources are sufficient to allow maximum effort on state and private lands within the control area” This proposal came up quickly, out of cycle, and as a result the public is largely unaware of the new language. It is doubtful to be popular amongst the general public on the Kenai. This amendment to the proposed language will help keep the Department doing biology and game management by not having to field so many “social issue” questions, and I **support the amended proposal**.

**Proposals 2,3 and 11** all deal with expanding harvest data. Information is paramount to science and management, and I **support** these proposals to give ADFG more data on sheep and caribou herds.

**Proposal 4: Firmly opposed.** Restricting aircraft use is not the way to build the WAH. . The proposed area is huge and remote, aircraft are a part of life in the Bush. Don't believe the authority is there; to create such a large CUA. Extremely hard to enforce. Pits hunter against hunter, the last thing the hunting heritage needs. The caribou are arguably disturbed also by the mail and commuter planes, exploration and research support aircraft, and all the riverboats. This proposal is attempting to build on the (shaky) precedent of new aircraft restrictions for sheep hunting which I opposed on similar grounds. Please vote no on Proposal 4.

**Proposal 8:** (Restricting Nonresidents first when a population is not reaching IM goals) This is a bright new proposal I am in **support** of. If we have an active IM plan on a population to increase harvest for residents, nonresident take should have already been restricted. This would match IM statute intent and seems common sense to me.

**Proposals 9,10,12, 14, and 16:** The allocation of sheep. In light of the ongoing sheep population declines and increased conflicts in the field, it is foolish to continue to allow nearly half our sheep to be taken by nonresidents. I **support capping the nonresident share of our sheep resource at 10%**. No more. This is what our state's Founders intended in Article 8: maximum benefit for the people. “The people” ,taken



from Alaska's Constitution, certainly implies "Alaskan people" a.k.a. residents. Take precedence from long-existing codified sheep and goat hunt allocation (TMA 10% Chugach 13%, Delta 10% etcetera in 5 AAC 92.057) Proposal 12 is the preferred route, it addresses the other steps to take concurrently with 10% NR cap: A harvest guideline level and switching to a NR only drawing in order to implement. Not only would limiting Nonresident take in the sheep via 10% harvest cap help the sheep population, it would greatly improve the field crowding complaints: Nonresident hunters typically hire guides, who have multiple and big camps, multiple planes, horses, cooks and packers, lots of people and activity. Nearly verbatim proposals have been before the Board of Game for many many years...it is time to give sheep allocation a try at 10% NR cap. Lets start in Region 5, with passage of Proposal 12, in preparation for statewide. Maybe even public notice it and take it up statewide at the Glenallen meeting?

**Proposal 19:** Repealing last year's passage of APHA proposal 51. Im sure you've had an earful of comments on this, I will simply **support** this without burning up ink. Please remove the new illegal bag limit restrictions for residents.

**Proposals 18,24, 30,31,32,35,40,42,43. Support.** These all address liberalizing bear regulation in various fashion (35 addresses wolf). I applaud the actions of the Board in recent years on this issue and support this direction. Bear predation is very high upon our food animals, I support reauthorization of tag fee exemptions, longer seasons, etcetera in the above. Proposal 35 might be a bit of help to Brooks range sheep and caribou populations on all that federal land.

**Proposal 25:** Add nonresident Mulchatna Caribou hunt: I **oppose** this idea. The Mulchatna Herd, after many years of decline, has only begun to recover, thanks in part to IM efforts. We need to let it grow. Especially considering last years liberalization of this hunt at the Statewide meeting, which I considered inadvisable. We do not yet know the effect of that action on the population. Interestingly, 19A and 19B, which the proposer wishes to add (19 C and D are already open by harvest ticket for nonresident hunters) is the home of all the nonresident moose closure river corridors. Hardly an environment that suits adding a NR hunt. Perhaps the best argument, Mulchatna is still under Intensive Management, so by the logic above in Proposal 8, why are we allowing ANY nonresident harvest before meeting the needs of Alaskans? Back in the mid- 90's Mulchatna caribou was a fantastic opportunity for everybody, I urge the Board to reject Proposal 25 and let the herd and that opportunity return.

Thank you for considering my thoughts on these 2017 proposals, and I do appreciate the time you all put into being Board members. Merry Christmas.

Douglas Malone

Homer AK



Submitted By  
Chad Sheldon  
Submitted On  
12/22/2016 4:22:46 PM  
Affiliation  
Maniilaq Association

On behalf of Maniilaq Association, the regional tribal organization whose service area encompasses most of Game Unit #23, we respectfully submit our recommendations to the proposed changes to the current hunting regulations.

We support the following Proposals:

- 1) Proposal # 1 as presented
- 2) Proposal # 8 as presented
- 3) Proposal # 17 as presented
- 4) Proposal # 18 as presented
- 5) Proposal # 37 as presented
- 6) Proposal # 38 as presented
- 7) Proposal # 39 as presented
- 8) Proposal # 40 as presented
- 9) Proposal # 43 as presented
- 10) Proposal # 44 as presented
- 11) Proposal # 45 as presented

We oppose the following Proposals:

- 12) Proposal # 9 as presented
- 13) Proposal # 10 as presented
- 14) Proposal # 11 as presented
- 15) Proposal # 12 as presented
- 16) Proposal # 13 as presented
- 17) Proposal # 14 as presented
- 18) Proposal # 15 as presented
- 19) Proposal # 16 as presented

Respectfully,

Chad Sheldon  
Interim President/CEO



**NATIVE VILLAGE OF GOODNEWS BAY  
TRADITIONAL VILLAGE COUNCIL  
P.O. BOX 138  
GOODNEWS BAY, ALASKA 99589**

Phone no. 907 967 8929 fax 967 8330  
Email address: [goodnews907@hotmail.com](mailto:goodnews907@hotmail.com)

November 14, 2016

ADF&G Board Support  
P.O. Box 115526  
Juneau, Ak. 99811-5526  
RE: Proposal 21- Bethel Area Proposal

Dear Sirs,

We are writing revise and/or amend proposal #21 to let you know the intent of this proposal.

The current proposal as written says on the third paragraph: "Add: by emergency order by the Alaska Department of Fish & Game (ADF&G) and/or U.S. Fish & Wildlife Service (USF&WS) announcing the opening of a 21 – day winter moose hunting season in Unit 18, south of and including the Goodnews River Drainage by permit only, permit number RMXXX. The permits will be available in person only at Goodnews Bay and Platinum. The hunt will open on January 1-31, with a bag limit of one moose, a quota of ten moose to be harvested. Once ten moose are harvested ADF&G will close the winter by emergency order. Hunters who harvested a moose during regulatory year are not eligible to participate in this hunt. All hunters are required to possess a valid Alaska hunting license and one state registration permit, permit number RMXXX."

Our suggestion is to strike out "21 day" on the third sentence and also "on January 1-31", along with additional language added. So the proposal would read: "**ADD: by emergency order by the Alaska Department of Fish & Game (ADF&G) and/or U.S. Fish & Wildlife Service (USF&WS) announcing the opening of a winter moose hunting season in Unit 18, south of and including the Goodnews River Drainage by permit only, permit number RMXXX. The permits will be available in person only at Goodnews Bay and Platinum. The hunt will open at the call of ADF&G and/or USF&WS sometime in winter, with a bag limit of one moose of either sex, antlered (bull) or antlerless (cow), a quota of ten moose to be harvested. Once ten moose are harvested ADF&G**





**and/or USF&WS will close the winter hunt by emergency order. ADF&G can determine who would be eligible for this winter hunt whether to include those who were successful in getting a moose during regulatory year (fall hunt) or not. All hunters are required to possess a valid Alaska hunting license and one State registration permit, permit number RMXXX.**

The reason why want to revise and/or amend this proposal is because these past years we have had different weather mostly warm winter and sometimes it rains in December and January so we want ADF&G and or/and USF&WS to determine which month of the year the opening will occur after concurring with the locals here since they are here in southwest part of Alaska and they are aware and can see the weather pattern. Within regards to moose, as you may be aware of, bull moose shed their antlers during winter and most of the hunters wouldn't be able to tell which sex of a moose they are seeing during their hunt and to be on the safe side of not breaking any law or regulations we want to able to harvest either a bull or a cow.

We have good relationship with both ADF&G and USF&WS and work cooperatively with both.

Sincerely,  
NATIVE VILLAGE OF GOODNEWS BAY  
GEORGE BRIGHT, SR., PRESIDENT

A handwritten signature in blue ink, appearing to read "Peter R. Julius".

Peter R. Julius, Tribal Administrator

CC: ADF&G  
USF&WS, Togiak National Wildlife Refuge



**Nome Eskimo Community**

Box 1090  
Nome, Alaska 99762  
Phone (907)443-2246  
Fax (907)443-3539  
www.necalaska.org



PC21  
1 of 1

December 22, 2016

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

Re: Alaska Board of Game 2016/2017 Proposals #30 and #31

Dear Chairman Spraker,

The Nome Eskimo Community supports the Alaska Board of Game 2016/2017 proposals #30 and proposal #31. These two proposals, both submitted by Kawerak, Inc. and Nome Eskimo Community, were put forth by listening to hunters about their concerns.

This proposal reflects the concerns of hunters in Game Management Unit 22C and in GMU 22B. For hunters in GMU 22C, Proposal #30 would open the window of opportunity to harvest a bear. As the spring break up date has been variable in recent years, the earlier date would allow hunters an opportunity to hunt while conditions are safer for snowmobile travel (i.e. more snow, frozen over rivers). For proposal #31, the bear population in GMU 22B is greater as of local memory, and where a survey conducted in 2015 by Alaska Department of Fish and Game indicates a rise in population. ADF&G managers have expressed concern that bear predation is having an effect on the moose population's ability to grow.

Thank you for considering our support for this proposal. If you have any comments or questions, you may contact Jacob Martin, Tribal Resources Director at (907) 443-9130 or by email: [Jacob.Martin@necalaska.org](mailto:Jacob.Martin@necalaska.org).

Sincerely,

**NOME ESKIMO COMMUNITY**

Emma Pate, Executive Director



unapologetically **FOR ALASKAN RESIDENTS**

PO Box 60095, Fairbanks, Alaska 99706 (907) 371-7436  
email [info@residenthuntersofalaska.org](mailto:info@residenthuntersofalaska.org) web [www.residenthuntersofalaska.org](http://www.residenthuntersofalaska.org)

December 21, 2016

## Resident Hunters of Alaska (RHAK)

Comments to Alaska Board of Game  
Bethel Western/Arctic Region V Meeting  
January 6-9, 2017

*Proposals we support: 2, 3, 8, 9, 10, 11, 12, 14, 16, 19*

*Proposals we oppose: 4, 22, 25*

Proposal 2 – 5AAC 92.010 Harvest tickets and reports; and 85.025 Hunting seasons and bag limits for caribou.

Modify the hunt structure of the Western Arctic and Teshekpuk caribou herds.

Resident Hunters of Alaska (RHAK) supports this proposal and anything the Department can do to obtain more accurate harvest data that is critical in managing these caribou herds. Changing over to a registration permit hunt will no doubt be difficult at first, but all hunters no matter where they live should be required to supply harvest information to the Department.

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Proposal 3 – 5AAC 92.010 (g) Harvest tickets and reports.

Remove the exception to harvest tickets and reports for caribou.

RHAK supports this proposal which is similar in intent to Proposal 2 from the Department. **The basic premise, as this proposer states, is that “accurate harvest data is essential in order for the Board of Game to make sound decisions....”**



This issue is an education issue at its heart. For a very long time, hunters north of the Yukon River have not been required to have a harvest ticket and turn in a report. Suddenly having to do so now may seem burdensome, and there are worries of non-compliance penalties.

**We don't think it can be argued any longer that there aren't many places in northwest Alaska where one can't send out mail or get on the internet. All hunters need to be educated about the importance of the collection of harvest data and how it benefits the resource and our opportunities.**

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Proposal 8 – 5AAC 85.045 Hunting seasons and bag limits for moose; and 85.025 Hunting seasons and bag limits for caribou.

Prohibit nonresident hunting of any prey species under intensive management in the Arctic/Western region until population and harvest objectives are met.

This is a RHAK proposal and we fully support it.

The intention behind this proposal is that there would not be any nonresident hunting of a moose or caribou population under any active Intensive Management predation control plans/programs in Region V until the minimum Intensive Management harvest and population objective has been met.

Intensive Management plans and programs are designed to increase moose and/or caribou populations to benefit Alaskans who depend on these ungulates as a food source.

RHAK supported the new hunting license and tag fee increases that go into effect starting in 2017, including the additional Intensive Management fee that both resident and nonresident hunters will pay as part of the cost of their hunting license. We recognize that Intensive Management efforts can benefit all hunters, including nonresident hunters, by providing more hunting opportunities once population and harvest objectives are met, which is why we should all pay for IM efforts. However, the intent of our IM Law and why certain areas undergo a formal predation control plan and program is to **“restore the abundance or productivity of identified big game prey populations as necessary to achieve human consumptive use goals.”**

**Meaning, Alaskans need to eat, that's the point of Intensive Management plans and programs, and until the population and harvest objectives are met for any prey species, there should be no competition for food from nonresident hunters.**

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Proposal 12 – 5AAC 85.055 Hunting seasons and bag limits for Dall sheep; and 92.008 Harvest guideline levels.

Establish a ten percent nonresident sheep harvest allocation cap and change all nonresident sheep hunts to draw permit hunts in the Arctic/Western Region.

This is a RHAK proposal and we fully support it.

Currently there are no open sheep seasons in Region V due to declining sheep populations offering no sustainable sheep hunting opportunities. This proposal seeks to codify a resident sheep hunting priority in Region V in future when and if sheep hunting is again allowed for nonresidents. It asks the board, when and if sheep numbers improve in Region V and sheep hunting opportunities are again allowed *for nonresidents*, that all nonresident sheep hunters be put on a draw-permit system whereby the nonresident harvest never exceeds 10% of the total harvest.

We want to stress that our proposal doesn't mean to imply or state that nonresident sheep hunting should again be allowed once there is sustainable sheep hunting opportunity for Alaskan residents. We believe that when and if any sheep hunting opportunities are again allowed in Region V that those opportunities should initially be resident-only hunts

When and if nonresident sheep hunting is again allowed, the Department would need to determine nonresident sheep permit allocations based on past historical nonresident sheep harvest data, beginning conservatively until new data comes in and permit numbers are reevaluated.

This proposal differs from some others in that it seeks to limit and codify harvest levels rather than overall opportunity levels. We want to stress that currently nonresident sheep hunters make up 20% of total sheep hunters and harvest 40-45% of sheep statewide. In some subunits nonresident sheep hunters account for 60-80% of total sheep harvests.

We need a system to regulate nonresident sheep harvests, however that comes about, both to protect our sheep resource and to give residents their constitutional hunting priority to that limited resource.

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Proposal 16 – 5AAC 92.057 Special provisions for Dall sheep and mountain goat drawing permit hunts; 92.061 Special provisions for brown bear drawing permit hunts; 92.069 Special provisions for moose drawing permit hunts; and 85.025 Hunting seasons and bag limits for caribou.



Establish a 90/10 percent permit allocation for resident and nonresident drawing permit hunts for sheep, moose, caribou, and brown bear.

This is a RHAK proposal and we fully support it.

This proposal asks regionally what others have asked in the past from the Board at the statewide level; when and where we have restrictive drawing permit hunts for all, residents should have a clear and substantial allocation priority as our state constitution intended.

We ask that residents receive a minimum of 90% of all draw permits for any current or future drawing permit hunt for sheep, moose, caribou or brown bear in Region V, where both residents and nonresidents are restricted. This clearly aligns with the intent of our Founders in Article 8 sections 1-4 of our state constitution:

- Article 8 - Natural Resources
- § 1. Statement of Policy
- It is the policy of the State to encourage the settlement of its land and the development of its resources by making them available for maximum use consistent with the public interest.
- § 2. General Authority:
- The legislature shall provide for the utilization, development, and conservation of all natural resources belonging to the State, including land and waters, for the maximum benefit of its people.
- § 3. Common Use
- Wherever occurring in their natural state, fish, wildlife, and waters are reserved to the people for common use.
- § 4. Sustained Yield
- Fish, forests, wildlife, grasslands, and all other replenishable resources belonging to the State shall be utilized, developed, and maintained on the sustained yield principle, subject to preferences among beneficial uses.

In the winter of 1955-56 when Alaskans were drafting our constitution, they had the knowledge of how decades as a territory had usurped the powers



and rights of actual Alaskans. This led to one of the most unique of all state constitutions in terms of natural resources. Our wildlife *is* a natural resource. Our wildlife is supposed to be managed under the sustained yield principle for the “maximum benefit of its people.” Our wildlife is “reserved to the people for common use.”

Resident hunters of Alaska *are* “**the people**” our Founders were referring to. When and where restrictive drawing hunts for all are necessary, resident Alaskans should receive a maximum benefit to any hunting opportunity.

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#### Proposal 19 – 5AAC 92.130 Restrictions to bag limits.

Remove the bag limit restriction for resident relatives accompanying nonresident second degree of kindred.

RHAK supports Proposal 19 and that it be amended on a Statewide basis per public noticing after Board deliberations and decisions at teleconference meetings in October and November of 2016.

*A review of the intent of “**Proposal 51**,” submitted by the Alaska Professional Hunters Association and passed by the Board of Game at the 2016 Statewide meeting, placing bag limit restrictions on resident Alaskans who accompany nonresident relatives within 2<sup>nd</sup> degree of kindred for a must-be-guided species:*

The first statewide “**guide law**” mandating that nonresident U.S. citizens must hire a licensed big game guide or hunt with a resident relative within 2<sup>nd</sup> degree of kindred for certain species passed in 1967 as Senate Bill 51. (It did not include mountain goat as a must-be-guided species until 20+ years later.)

Originally, the bill did not include allowance for a nonresident U.S. citizen to hunt with a resident Alaskan relative for sheep or brown/grizzly bear, and it became a sticking point in committee hearings. The guide lobby did not support an allowance to hunt without a licensed big game guide for sheep or brown/grizzly bear, fearing it would take away from the new subsidy the state was providing them in the form of ensuring they had constant clientele for guided brown/grizzly bear and sheep hunts. **Resident hunters didn’t think** it was fair to force their nonresident relatives to hire a guide at great expense when they were just as capable of accompanying them in the field and wanted to continue the lifelong bonds of hunting together with a family member. In the end, the legislature agreed with resident hunters and added additional language that allowed for a nonresident hunter who is a U.S. citizen to hunt brown/grizzly bear and sheep with a resident relative over 19



years of age within 2<sup>nd</sup> degree of kindred. This became Alaska Statute AS 16.05.407.

The guide lobby has **never liked this aspect of the “must-be-guided” statute**. For decades the **industry has worked to separate out the “next-of-kin”** nonresident hunters from the guided nonresident hunters in draw permit pools. They have been partially successful on Kodiak Island in Unit 8 in convincing the Board of Game to put nonresident **“next of kin”** brown bear permits in the resident hunter pool.

Looking for further ways to limit the ostensible negative effects of nonresident hunters who hunt with a resident relative for a must-be-guided species, the guide lobby petitioned the Board to change the entire intent of the must-be-guided statute so that now when a resident Alaskan accompanies his or her nonresident father or sister on a sheep, mountain goat, or brown/grizzly bear hunt, if that nonresident relative is successful the resident relative must forfeit his or her tag and opportunity to hunt that species that calendar year. In areas where we have 1-in-4-year brown bear hunting restrictions for all, a resident relative would have to wait four years before being allowed to legally put in for and hunt that permit if his nonresident relative were successful.

During the same Statewide 2016 meeting, the Board also passed another guide lobby proposal (#30) restricting all nonresident sheep hunters to a 1-in-4-year opportunity. The Department commented that this proposal would have little or no effect on guided sheep hunters, rather it would mostly effect nonresident sheep hunters wanting to hunt with a resident relative. The intent of both guide lobby proposals passed by the Board was to discourage nonresident next-of-kin **“unguided”** hunting for a must-be-guided species.

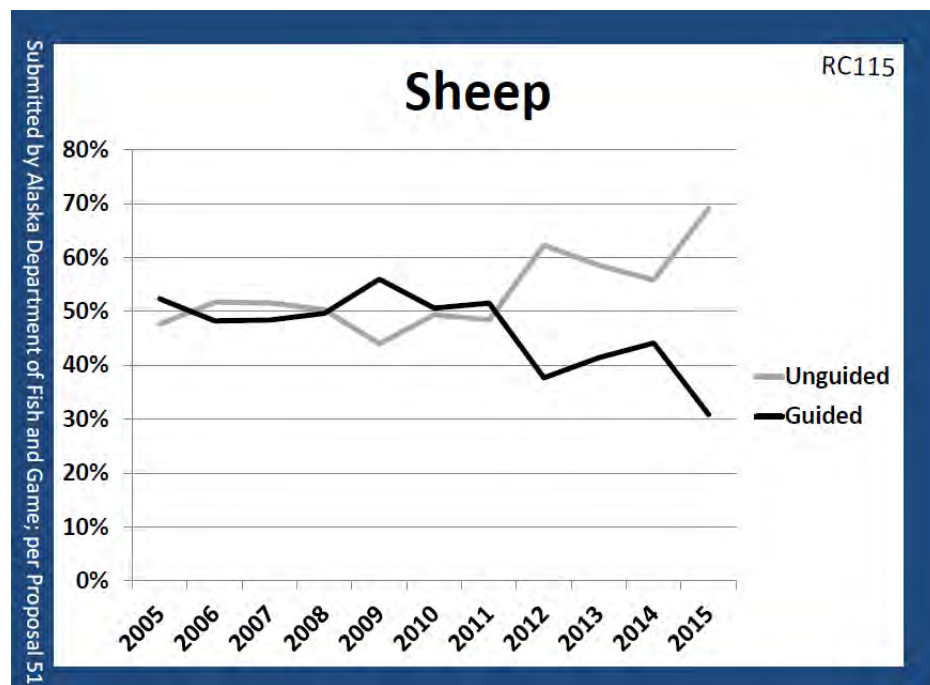
*What was the rationale for the Board of Game to pass APHA Proposal #51?*

When the Board passed the guide lobby proposal #51 at the Statewide 2016 meeting, the new restrictions to resident Alaskans who hunt with a nonresident relative were not based on any biological or conservation concerns, nor were they based on any scientific data from the Alaska Department of Fish and Game.

Before deliberating on Proposal 51, the Board requested the Department to supply **data on “next of kin” percentages for must-be-guided species**, to better evaluate just how many nonresidents hunting a must-be-guided **species were really hunting under the “next-of-kin” guidelines**. The



Department submitted a record copy (RC 115) report that included this slide (see below) on nonresident sheep hunter data that showed nonresident sheep **hunters hunting with a "next-of-kin" resident relative made up 70% of all nonresident sheep hunters:**



The board passed the guide lobby proposal based in large part on the RC 115 report from ADFG. No one really questioned the validity of the data.

The Department, however, realized they had made a mistake with the initial report, and issued RC 123, correcting the nonresident sheep hunter data, essentially reversing the figures to show that nonresident sheep hunters **hunting with a "next-of-kin" resident relative made up** approximately 30% of total nonresident sheep hunters, *not* 70%. (But even that data was flawed and overestimated the percentage of "next-of-kin" sheep hunters. New guided hunt record data compiled by the Big Game Commercial Services Board in December 2016 and released to the public tentatively shows a 16% nonresident "next-of-kin" sheep hunter percentage over the last ten years.)

Nevertheless, even though the Department submitted RC 123 and told the Board they had made a mistake, the Board chose not to reconsider passage of Proposal 51 based on new information and instead moved to delay implementation for two years to give the Department time to work out how they were going to track and enforce the new regulation.



In the end, the recorded audio deliberations show what this was all about. **The Board was going to determine which had "more value," the nonresident guided hunter or the nonresident hunter hunting with a resident relative within 2<sup>nd</sup> degree of kindred. The board chose the "nonresident guided hunter" as having "more value;" that was their entire rationale for passing the guide lobby proposal. If anyone was looking for a perfect example of how our current Board of Game is influenced by the guide lobby, this would be it!**

### *In Closing*

RHAK has sent in extensive letters and comments regarding passage of the Alaska Professional Hunters Assn. proposal 51 at the Statewide 2016 Board of Game meeting. We submitted a legal argument that the Board of Game does not have the authority to change the **"must-be-guided" law under Alaska Statute AS 16.05.407**, expecting a formal opinion from the Department of Law. Instead we got a differing opinion from the attorney attached to the Board of Game using the rationale that "if you put two lawyers in a room they will come up with three different opinions." Some legislators, however, agree that the Board of Game does not have the authority to change a statute in this manner, just as they agree that the Board of Game does not have the authority to **create new "must-be-guided"** species (which they have done with moose and black bear in some areas).

It should trouble all Alaskan hunters that the Board of Game has deemed that a resident father accompanying his nonresident son on a sheep or bear hunt has less value than another nonresident on a guided sheep or bear hunt. Or that the Board of Game even believes they have the authority to make such a call and decision when there are: No biological concerns. No conservation concerns. No crowding concerns.

The guide lobby didn't like competition from "unguided" nonresident hunters who hunted with resident relatives. *That was all this was about.*

It deeply saddens and troubles us that the majority of resident Alaskans serving on the Board of Game voted by majority to restrict their fellow Alaskans for no rational reason whatsoever.

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Proposal 25 – 5AAC 85.025 Hunting seasons and bag limits for caribou.

Open a nonresident draw hunt for caribou in Units 18 and 19.

RHAK opposes this proposal.



The Mulchatna Caribou Herd (MCH) is currently under an active Intensive Management predation control program to increase the herd size for human consumptive uses by Alaskans.

The proposer implies that resident Alaskans in the region are unable to harvest sufficient caribou because of more remote herd locations that are inaccessible to residents but would be accessible to nonresidents, and a light harvest by those nonresident hunters is acceptable because most of the meat from that light harvest will be “left in the communities.”

The Department and Board of Game use population data to determine hunting seasons and bag limits and overall opportunity for both residents and nonresidents. This type of proposal fails to outline that if you take 50 caribou from a herd, no matter if it is right next to a community or in more remote locations, it counts toward the next population estimate, which reflects the kind of hunting opportunity the Board and Department may allow. Basically, every caribou matters, and we hope the public and Board are not swayed by proposals seeking to allow limited nonresident or nonresident guided opportunities for a wildlife resource that is not meeting subsistence needs.

RHAK has a proposal (#8) currently before the Board requesting that no nonresident hunting be allowed for any caribou or moose population currently under an active Intensive Management predation control program. This proposal is a good example of why we submitted Proposal 8.

In this case, the ANS for the MCH is 2100 – 2400 caribou, which is well above the current harvestable surplus, therefore nonsubsistence uses of the MCH is prohibited by law under AS 16.05.258.

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Thank you for reading our comments!

Resident Hunters of Alaska (RHAK)

Contact us at: [info@residenthuntersofalaska.org](mailto:info@residenthuntersofalaska.org)

Tuntutuliak Traditional Council  
PO Box 8086  
Tuntutuliak, Alaska 99680  
Ph: (907)256-2128, Fax (907)256-2080



### OPPOSITION TO PROPOSAL 21

**WHEREAS**, the Native Village of Tuntutuliak is a Federally Recognized Tribe under the Federal Government, and,

**WHEREAS**, the Tuntutuliak Traditional Council is a Tribal Entity organized for the purpose of leadership and program operations for the Village of Tuntutuliak, and,

**WHEREAS**, the Alaska Department of Fish & Game, is considering Proposal 21, Opening a winter hunting season for moose in Unit 18, and,

**WHEREAS**, the Population within Unit 18, RM 615 Area, surpasses 13,000 plus, and,

**WHEREAS**, the Departments of Fish & Game/Fish & Wildlife, only allocated 150 Bull Moose for Subsistence Harvest for Fiscal Year 2016, and,

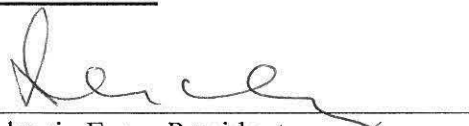
**WHEREAS**, this allocation does not meet the Subsistence needs of the RM 615 Area Residents, and,

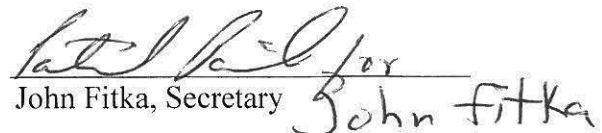
**NOW THEREFORE BE IT RESOLVED THAT**, the Native Village of Tuntutuliak, through Organizational Joint Meetings, do hereby OPPOSE Proposal 21, Opening a winter hunting season for moose in Unit 18, until moose harvest and population meets the Subsistence requirements of the Area Residents.

### CERTIFICATION

**PASSED AND APPROVED BE A CONSTITUTED QUORUM OF THE TUNTUTULIAK TRADITIONAL COUNCIL ON THIS 25<sup>th</sup> DAY OF October 2016, BY A VOTE OF; 5 IN FAVOR, 0 OPPOSED, AND 0 ABSTAINING.**

**ATTESTED:**

  
Johnnie Evan, President

  
John Fitka, Secretary



# 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:  
10.D. (AKRO-NR)

DEC 21 2016



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:

Thank you for the opportunity to participate in the Board of Game process. As has been mentioned in both written and in-person testimony, the vast majority of Board decisions are in alignment with the National Park Service (NPS) management objectives. We appreciate your consideration on the handful of proposals that may not be consistent with NPS-related statute, regulation or policy. Following are NPS comments on proposals before the Board of Game during the January 6-9, 2017 meeting in Bethel that have the potential to affect National Park Service (NPS) areas in the state.

### Proposal 31: NPS Recommendation: Oppose.

This proposal would increase the bag limit for brown bear from 1 to 2 bears every regulatory year in Unit 22B including portions of Bering Land Bridge National Preserve. The NPS does not agree with the proponent's claim that the joint NPS and ADF&G brown bear survey completed in May 2015 indicated that the bear population on the Seward Peninsula was increasing. Rather, survey results suggest that the density of bears in the study area was not markedly different from previous estimates of bear populations in northwestern Alaska stretching back to 1991. The NPS believes additional survey information will be necessary to assess the current population trajectory, particularly in the context of the more heavily hunted areas where harvest has nearly doubled since 1997. In addition, the primary purpose of these proposals appears to be to reduce brown bear abundance to enhance moose and caribou populations. If adopted, this proposal would be contrary to, and in conflict with, NPS regulations that prohibit predator reduction efforts.

If the Board adopts this proposal, the NPS requests that park exemptions be reflected in the Alaska Hunting Regulation booklet. This request is in the interest of hunters in the field interpreting the difference between State and Federal regulation.



Proposal 34: NPS Recommendation: Oppose.

This proposal would lengthen the hunting season for wolverine in Unit 26 including portions of Gates of the Arctic National Park and Preserve. The NPS does not support the taking of furbearers during the breeding season when their pelts have little trophy, economic, or subsistence value; or when harvest appears to be wanton waste. Wolverine taken by sport hunters in the summer also reduces opportunity and potential economic gain by local subsistence trappers. For these reasons, we ask that the Board exclude NPS lands if this proposal is adopted.

Proposal 35: NPS Recommendation: Oppose.

This proposal would shift the hunting season for wolf in Unit 26 including portions of Gates of the Arctic National Park forward by 11 days. The NPS does not support the taking of wolves during the denning season when their pelts have little trophy, economic, or subsistence value; or when harvest appears to be wanton waste. NPS regulations prohibit the taking of wolves between May 1 and August 9.

If the Board adopts this proposal, the NPS requests that park exemptions be reflected in the Alaska Hunting Regulation booklet. This request is in the interest of hunters in the field interpreting the difference between State and Federal regulation.

Proposal 37, 38, & 39: NPS Recommendation: Oppose 37, General Comment.

Proposals 37, 38, and 39 lengthen the hunting season for brown bears in Unit 23 including portions of Bering Land Bridge National Preserve, Gates of the Arctic National Park and Preserve, and Noatak National Preserve by 30, 10, and 6 days respectively. Many brown bears in Unit 23 fish along anadromous rivers and streams into August and we have concerns that opening the brown bear hunting season as early as August 1 would disproportionately increase harvest pressure on bears while they are concentrated along river corridors.

With respect to proposal 39, the statement that the 'Noatak National Park Service is also on board with this proposal' is incorrect - Western Arctic National Parklands, which administers Noatak National Preserve, did not indicate support of this proposal.

Proposal 40: NPS Recommendation: Oppose.

This proposal would increase the resident bag limit for brown bear from 1 bear to 2 bears per regulatory year in Unit 23 including portions of Bering Land Bridge National Preserve, Gates of the Arctic National Park and Preserve, and Noatak National Preserve. Aerial bear surveys were conducted in the Noatak River drainage in 1987 and 2016. While preliminary analyses of the 2016 survey suggest that brown bear numbers might be higher, the surveys varied in methodology and scale and are not directly comparable. Because the consequences of making an error in brown bear population management are high and reduced populations require many years to recover, we recommend obtaining additional population trend information prior to increasing harvest of bears in the area. Also, the primary stated purpose of these proposals is to reduce brown bear abundance to enhance moose and caribou populations. If adopted, this proposal would be contrary to, and in conflict with, NPS regulations that prohibit predator reduction efforts.



If the Board adopts this proposal, the NPS requests that park exemptions be reflected in the Alaska Hunting Regulation booklet. This request is in the interest of hunters in the field interpreting the difference between State and Federal regulation.

Proposal 42: NPS Recommendation: Oppose.

This proposal would allow the use of bait for black and brown bear hunting in Unit 23, which includes portions of Bering Land Bridge National Preserve, Gates of the Arctic National Park and Preserve, and Noatak National Preserve. NPS regulations prohibit the harvest of black and brown bears over bait.

If the Board adopts this proposal, the NPS requests that park exemptions be reflected in the Alaska Hunting Regulation booklet. This request is in the interest of hunters in the field interpreting the difference between State and Federal regulation.

Proposal 43: NPS Recommendation: Oppose.

This proposal would allow the use of snowmachines to position and harvest brown bears and furbearers in Unit 23, which includes portions of Bering Land Bridge National Preserve, Gates of the Arctic National Park and Preserve, and Noatak National Preserve. NPS regulations prohibit the disturbance of wildlife by snowmachines.

If the Board adopts this proposal, the NPS requests that park exemptions be reflected in the Alaska Hunting Regulation booklet. This request is in the interest of hunters in the field interpreting the difference between State and Federal regulation.

We appreciate the Board's recognition that laws, regulation and/or policies affecting the NPS may differ from the State, and may even require different management approaches. Where that is the case, we ask that NPS areas be excluded from regulations implementing intensive management objectives in Alaska's hunting regulations. We recognize and appreciate previous Board actions where consideration has been given to exclude intensive management measures on NPS-managed lands.

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

Sincerely,

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

Debora Cooper  
Associate Regional Director



IN REPLY REFER TO  
OSM 16094.PM

## United States Department of the Interior

Office of Subsistence Management  
1011 East Tudor Road MS 121  
Anchorage, Alaska 99503-6199

DEC 06 2016

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

ATTN: Board of Game Comments

Dear Chairman Spraker:

The Alaska Board of Game is scheduled to meet January 6-9, 2017 to deliberate proposals concerning changes to regulations governing hunting and trapping of wildlife for the Arctic and Western Region. We have reviewed the 45 proposals the Board will be considering at this meeting.

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

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues. Please contact 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

Enclosure





Chairman Spraker

2

cc: Tony Christianson, Chair, Federal Subsistence Board  
Stewart Cogswell, Acting 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, Executive Director, Board of Game, Board Support Section  
Alaska Department of Fish and Game  
Bruce Dale, Wildlife Division Director, Alaska Department of Fish and Game  
Jill Klein, Federal Subsistence Liaison Team Leader  
Alaska Department of Fish and Game  
Interagency Staff Committee  
Administrative Record



## **RECOMMENDATIONS**

### **ALASKA BOARD OF GAME PROPOSALS**

**Arctic and Western Region**

**January 6-9, 2017**

**Bethel, Alaska**

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



**PROPOSAL 2 – 5 AAC 92.010. Harvest tickets and reports; and 85.025. Hunting seasons and bag limits for caribou.** Modify the hunt structure of the Western Arctic and Teshekpuk caribou herds.

*Note: This proposal is scheduled for the Arctic/Western Region meeting as Proposal 2 and the Interior/Northeast Arctic Region meeting as Proposal 103.*

**Current Federal Regulation:**

**Unit 21D remainder – Caribou**

*Unit 21D, remainder—5 caribou per day, as follows: Calves may not be taken*

*Bulls may be harvested*

*July 1-Oct. 14.*

*Feb. 1-June 30.*

*Cows may be harvested*

*Sep. 1-Mar. 31.*

**Unit 23 – Caribou**

*Unit 23—that portion which includes all drainages north and west of, and including, the Singoalik River drainage—5 caribou per day as follows:*

*Calves may not be taken*

*Bulls may be harvested*

*July 1-Oct. 14.*

*Feb. 1-June 30.*

*Cows may be harvested. However, cows accompanied by calves may not be taken July 15-Oct. 14*

*July 15-Apr. 30.*

*Unit 23, remainder—5 caribou per day, as follows: Calves may not be taken*

*Bulls may be harvested*

*July 1-Oct. 31.*

*Feb. 1-June 30.*

*Cows may be harvested. However, cows accompanied by calves may not be taken July 31-Oct. 14*

*July 31-Mar. 31.*

**Unit 24 – Caribou**

*Units 24A remainder, 24B remainder—5 caribou per day as follows:*

*Calves may not be taken*

*Bulls may be harvested*

*July 1-Oct. 14.*

*Feb. 1-June 30.*

*Cows may be harvested.*

*July 15-Apr. 30.*



*Units 24C, 24D—5 caribou per day as follows: Calves may not be taken  
Bulls may be harvested*

*July 1-Oct. 14.  
Feb. 1-June 30.  
Sep. 1-Mar. 31.*

*Cows may be harvested*

**Unit 26A – Caribou**

*Unit 26A—that portion of the Colville River drainage upstream from the  
Anaktuvuk River, and drainages of the Chukchi Sea south and west of, and  
including the Utukok River drainage—5 caribou per day as follows: Calves  
may not be taken*

*Bulls may be harvested*

*July 1-Oct. 14.  
Dec. 6-June 30.  
July 16-Mar. 15.*

*Cows may be harvested; however, cows accompanied by calves may not be  
taken July 16-Oct. 15*

*Unit 26A remainder—5 caribou per day as follows: Calves may not be taken  
Bulls may be harvested*

*July 1-Oct. 15.  
Dec. 6-June 30.  
July 16-Mar. 15.*

*Up to 3 cows per day may be harvested; however, cows accompanied by  
calves may not be taken July 16-Oct. 15*

**Unit 26B – Caribou**

*Unit 26B, that portion south of 69°30' N. lat. and west of the Dalton  
Highway—5 caribou per day as follows:*

*Bulls may be harvested*

*July 1-Oct. 14.  
Dec. 10-June 30.  
July 1-Apr. 30.*

*Cows may be harvested*

*Unit 26B remainder—5 caribou per day as follows:*

*Bulls may be harvested*

*July 1-June 30.*

*Cows may be harvested*

*July 1-May 15.*

**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 2017.

**Impact to Federal Subsistence users/wildlife:** This proposal would increase the regulatory burden on Federally qualified subsistence users by requiring them to obtain a registration permit. However, data provided by this proposal would be extremely useful in tracking harvest of the Western Arctic Caribou



Herd (WACH) and the Teshekpuk Caribou Herd (TCH), including determining if overharvest is occurring by herd and/or by sex (i.e. > 2% of cows in harvest). Currently, harvest is extrapolated from community harvest surveys and it is difficult to determine what role human harvest may be having on the current status of both herds. This proposal would also allow for increased management flexibility and quicker responses to changing conditions by allowing for more responsive management action via harvest monitoring.

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

**Rationale:** This proposal would aid in the conservation of the WACH and TCH, vital subsistence resources. However, due to the large amount of Federal public lands over much of the range of both herds, in order for this proposal to be truly effective, a similar proposal would need to be approved by the Federal Subsistence Board.

**PROPOSAL 3 – 5 AAC 92.010(g). Harvest tickets and reports.** Remove the exception to harvest tickets and reports for caribou

**Current Federal Regulation:**

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

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

**Is a similar issue being addressed by the Federal Subsistence Board?** 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 2017.

**Impact to Federal subsistence users/wildlife:** Requiring Federally qualified subsistence users residing north of the Yukon River to obtain a harvest ticket and submit reports when hunting caribou could be burdensome especially for those residents living in very remote areas. Obtaining accurate harvest information using harvest tickets would provide useful information for Federal and State agencies responsible for managing caribou populations.

There would be no impact to caribou if this proposal was adopted.

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

**Rationale:** The data gathered from harvest ticket reports are an important management tool that provides valuable information to aid caribou population management decisions. The TCH has declined 40% since 2008 and the WACH has declined 50% since 2003. To address these declines, changes were made to



State regulations for 2015/2016 and 2016/2017 and to Federal regulations for 2016-2018. Accurate harvest information on location, number, date of harvest and sex is needed to monitor the effects of hunting pressure.

**PROPOSAL 11 - 5 AAC 92.010(h). Harvest tickets and reports.** Remove the exception to harvest tickets and reports for sheep.

**Current Federal Regulation:**

**Unit 23—Sheep**

<i>Unit 23, remainder (Schwatka Mountains) that portion within Gates of the Arctic National Park and Preserve—1 ram with 7/8 curl or larger horn</i>	<i>Aug. 10 – Sep. 20</i>
<i>Unit 23, remainder (Schwatka Mountains) that portion within Gates of the Arctic National Park and Preserve—1 sheep</i>	<i>Oct. 1 – Apr. 30</i>

**Unit 24—Sheep**

<i>Units 24A and 24B—(Anaktuvuk Pass residents only)—that portion within the Gates of the Arctic National Park—community harvest quota of 60 sheep, no more than 10 of which may be ewes, and a daily possession limit of 3 sheep per person, no more than 1 of which may be a ewe</i>	<i>July 15 – Dec. 31</i>
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<i>Units 24A and 24B—(excluding Anaktuvuk Pass residents)—that portion within the Gates of the Arctic National Park—3 sheep, no more than one of which may be a ewe, by Federal registration permit only, with exception for residents of Alatna and Allakaket who will report by a National Park Service community harvest system</i>	<i>Aug. 1 – Apr. 30</i>
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**Unit 26—Sheep**

<i>Unit 26A and 26B—(Anaktuvuk Pass residents only)—that portion within the Gates of the Arctic National Park—community harvest quota of 60 sheep, no more than 10 of which may be ewes and a daily possession limit of 3 sheep per person, no more than 1 of which may be a ewe</i>	<i>July 15 – Dec. 31</i>
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<i>Unit 26A—(excluding Anaktuvuk Pass residents)—those portions within the Gates of the Arctic National Park—3 sheep</i>	<i>Aug. 1 – Apr. 30</i>
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**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 2017.



**Impact to Federal Subsistence users/wildlife:** Adoption of this proposal will have no effect on Federally qualified subsistence users' opportunities to harvest sheep. However, it will resolve ambiguity associated with permitting and reporting requirements for sheep harvest within Gates of the Arctic National Park.

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

**Rationale:** Gates of the Arctic National Park is closed to the harvest of sheep except to those eligible under Federal subsistence regulations. Consequently, there is no requirement for hunters to acquire a State issued harvest ticket, making this exception irrelevant. Deleting the exception will resolve any ambiguity associated with permitting and reporting requirements for sheep harvest within Gates of the Arctic National Park.

**PROPOSAL 17 – 5 AAC 92.990 (26). Definitions.** Change the definition of “edible meat” for game birds.

**Current Federal Regulation:**

**§100.25(a) Definitions**

*Edible meat means the breast meat of ptarmigan and grouse, and those parts of caribou, deer, elk, mountain goat, moose, muskox, and Dall sheep that are typically used for human consumption, which are: The meat of the ribs, neck, brisket, front quarters as far as the distal (bottom) joint of the radius-ulna (knee), hind quarters as far as the distal joint (bottom) of the tibia-fibula (hock) and that portion of the animal between the front and hindquarters; however, edible meat of species listed in this definition does not include: Meat of the head, meat that has been damaged and made inedible by the method of taking, bones, sinew, and incidental meat reasonably lost as a result of boning or close trimming of the bones, or viscera. For black bear, brown and grizzly bear, “edible meat” means the meat of front quarter and hindquarters and meat along the backbone (backstrap).*

**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 2017.

**Impact to Federal subsistence users/wildlife:** Adoption of this proposal will result in misalignment of State and Federal regulations, which may increase regulatory complexity, user confusion, and law enforcement concerns. Processing time for game birds would increase. There are no biological concerns for this proposal. It should be noted that the Federal Subsistence Board only regulates grouse and ptarmigan, while the subsistence harvest of migratory birds is managed by the U.S. Fish and Wildlife Service. A companion proposal would need to be submitted to the Federal Subsistence Board to adopt this



language into Federal Subsistence regulations for grouse and ptarmigan to gain consistency across State and Federal regulations.

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

**Rationale for comment:** This proposal would increase regulatory complexity and place additional burden on Federally qualified subsistence users.

**PROPOSAL 18 - 5 AAC 92.015. Brown bear tag fee exemptions.** Reauthorize resident tag fee exemptions for brown bear in Units 18, 22, 23 and 26A.

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

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

**Is a similar issue being addressed by the Federal Subsistence Board?** 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 2017.

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

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

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

**PROPOSAL 21 - 5 AAC 85.045. Hunting seasons and bag limits for moose.** Open a winter hunting season for moose in Unit 18.

**Current Federal Regulation:**

**Unit 18—Moose**

*Unit 18—Goodnews River drainage and south to the Unit 18 boundary—1 Sep. 1 – 30*





*antlered bull by State registration permit. Any needed closures will be announced by the Togiak National Wildlife Refuge Manager after consultation with BLM, ADF&G, and the Chair of the Yukon-Kuskokwim Delta Subsistence Regional Advisory Council*

**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 2017.

**Impact to Federal Subsistence users/wildlife:** In the short term, creation of a winter moose season in the Goodnews hunt area would provide additional opportunities for Federally qualified subsistence users to harvest moose. However, if additional harvest is not sustainable and results in a population decline, subsistence users in the area would be negatively impacted.

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

**Rationale:** Although there is anecdotal evidence that the moose population in the Goodnews River drainage is growing, it is not clear whether the population can withstand a 50% increase in the annual harvest quota. OSM defers to the expertise and judgment of local Federal and State biologists as to whether the creation of a winter season is advisable.

**PROPOSAL 23 - 5 AAC 85.045(16). Hunting seasons and bag limits for moose.** Reauthorize the antlerless moose hunting seasons in the Remainder of Unit 18.

**Current Federal Regulation:**

**Unit 18—Moose**

*Unit 18 remainder—2 moose, only one of which may be antlered. Antlered Aug. 1 – Mar. 31  
bulls may not be harvested from Oct. 1 through Nov. 30*

**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 2017.

**Impact to Federal Subsistence users/wildlife:** This proposal will increase harvest opportunity for Federally qualified subsistence users.

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

**Rationale:** This proposal would allow additional opportunity for Federally qualified subsistence users to



harvest moose in this unit and would provide management flexibility.

**PROPOSAL 29 - 5 AAC 85.025. Hunting seasons and bag limits for caribou.** Open a hunting season for caribou in Unit 22A by emergency order only.

**Current Federal Regulation:**

**Unit 22—Caribou**

*Unit 22A, remainder—5 caribou per day. Calves may not be taken* *July – 1 June 30,  
season may be  
announced*

**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 2017.

**Impact to Federal Subsistence users/wildlife:** Adoption of this proposal will have no effect on Federally qualified subsistence users.

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

**Rationale:** The goal of this proposal appears to be allowing for caribou harvest in southern Unit 22 only when caribou are present. Currently, in both State and Federal regulation, the caribou season in this hunt area is open by announcement only. Consequently, adoption of this proposal will have no effect on season openings. The proponent also suggests liberalization of the harvest limits and restrictions. Given that both the Federal and State Boards have recently adjusted regulations across this herd’s range in response to a population decline, liberalization of limits and restrictions is not warranted.

**PROPOSAL 31 - 5 AAC 85.020. Hunting seasons and bag limits for brown bear.** Increase the bag limit for brown bear in Unit 22B.

**Current Federal Regulation:**

**Unit 22—Brown Bear**

*Units 22A, 22B, 22D remainder, and 22E—1 bear by State registration* *Aug. 1 – May 31*  
*permit only*

**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





years. Given the uncertainty associated with current population trends, along with the doubling of annual reported harvest since the 1990s, extending the season is not warranted at this time and may pose a threat to the conservation status of brown bears in this area.

**PROPOSAL 33 - 5 AAC 85.045(24). Hunting seasons and bag limits for moose.** Reauthorize the antlerless moose hunting season in the western portion of Unit 26.

**Current Federal Regulations:**

**Unit 26A—Moose**

*Unit 26A—that portion of the Colville River drainage upstream from and including the Anaktuvuk River drainage—1 bull* Aug. 1 – Sept. 14

*Unit 26A— that portion of the Colville drainage upstream from and including the Anaktuvuk River drainage—1 moose, however you may not take a calf or a cow accompanied by a calf.* Feb. 15 – Apr. 15

*Unit 26A—that portion west of 156°00’W Long. and excluding the Colville River Drainage—1 moose, however, you may not take a calf or a cow accompanied by a calf.* July 1 – Sept. 14

*Unit 26A, remainder—1 bull* Aug. 1 – Sept. 14

*Unit 26B— excluding the Canning River drainage—1 bull* Aug. 1 - Sept. 14

*Unit 26B remainder and 26C—1 moose by Federal registration permit by residents of Kaktovik only. Federal public lands are closed to the taking of moose except by a Kaktovik resident holding a Federal registration permit and hunting under these regulations.* May be announced

**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 2017.

**Impact to Federal Subsistence users/wildlife:** Reauthorizing the antlerless moose season in the western portion of Unit 26A would provide additional opportunity for Federally qualified subsistence users to harvest moose. Anterless moose harvest under State regulations is limited primarily through the use of drawing permit hunts. Although moose numbers in Unit 26A are at the lowest level since 1970, due to the very limited season from Jul. 1 – Sept. 14, and because very few moose are typically harvested in this hunt, reauthorizing the antlerless season is not anticipated to have a negative impact on this population.

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

**Rationale:** Reauthorizing the State antlerless season will retain management flexibility in Unit 26A and



allow Federally qualified subsistence users additional opportunity to harvest a moose in this unit.

**PROPOSAL 34 – 5 AAC 85.057. Hunting seasons and bag limits for wolverine.** Lengthen the hunting season for wolverine in Unit 26.

**Current Federal Regulation:**

**Unit 26— Wolverine**

*5 wolverines*

*Sept. 1–Mar. 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 2017.

**Impact to Federal subsistence users/wildlife:** Federally qualified subsistence users would be provided more opportunity to harvest wolverine under the proposed hunting regulations. Although the proponent mentioned a change in bag limits for wolverine, no specific recommendation was made.

Wolverines, which occur at low densities throughout Alaska have large home ranges ranging from 39 mi<sup>2</sup> to 386 mi<sup>2</sup>. The breeding season extends from May through August. Following implantation which generally occurs from November through March, and a gestation period of 30-40 days, 1-2 young are born between February and April. The kits remain with female for 12-14 weeks. Therefore, kits born in late April would be just leaving the den in late July. Adoption of this proposal would extend the harvest into the denning period. While females likely only leave the dens for short periods of time to access food, the risk of litter loss would increase.

Although there is considerable underreporting, the reported wolverine harvests from 2009-2012 indicate that the hunting and trapping harvest is sustainable for Unit 26. However, the biological impact of extending the harvest season is unknown.

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

**Rationale:** The proposed change to extend the hunting season to mid-July would overlap with wolverine breeding and the denning period. This proposed change would also result in misalignment of Federal and State wolverine hunting seasons for Unit 26. Maintaining the current harvest season from Sept. 1 – Mar.31 is recommended.

**PROPOSAL 36 – 5 AAC 85.045(21). Hunting seasons and bag limits for moose.** Reauthorize the antlerless moose hunting seasons in Unit 23.

**Current Federal Regulation:**



## Unit 23 – Moose

*Unit 23—that portion north and west of and including the Singoalik River drainage, and all lands draining into the Kukpuk and Ipewik Rivers—1 moose; no person may take a calf or a cow accompanied by a calf* July 1-Mar. 31.

*Unit 23—that portion lying within the Noatak River drainage—1 moose; however, antlerless moose may be taken only from Nov. 1-Mar. 31; no person may take a calf or a cow accompanied by a calf* Aug. 1-Mar. 31.

*Unit 23, remainder—1 moose; no person may take a calf or a cow accompanied by a calf* Aug. 1-Mar. 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 2017.

**Impact to Federal Subsistence users/wildlife:** This proposal will increase harvest opportunity for Federally qualified subsistence users.

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

**Rationale:** This proposal would allow for additional opportunity for Federally qualified subsistence users to harvest moose in this unit and would provide management flexibility.

**PROPOSAL 44 – 5 AAC 92.540(9)(A). Controlled use areas.** Modify the area of the Noatak Controlled Use Area in Unit 23.

### **Current Federal Regulation:**

#### **§100.26 Subsistence taking of wildlife.**

*(23)(ii)(A) You may not use aircraft in any manner either for hunting of ungulates, bear, wolves, or wolverine, or for transportation of hunters or harvested species in the Noatak Controlled Use Area for the period August 15-September 30. The Area consists of that portion of Unit 23 in a corridor extending 5 miles on either side of the Noatak River beginning at the mouth of the Noatak River, and extending upstream to the mouth of Sapun Creek. This closure does not apply to the transportation of hunters or parts of ungulates, bear, wolves, or wolverine by regularly scheduled flights to communities by carriers that normally provide scheduled air service.*

**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 2017.

**Impact to Federal Subsistence users/wildlife:** Adoption of this proposal could increase opportunity for Federally qualified subsistence users, particularly from the village of Noatak by reducing competition and conflict with nonlocal hunters who access the area by plane rather than by boat. The migration route of the Western Arctic Caribou herd has shifted east in recent years. From 2012-2014, the WACH migrated through Ivishak Pass at the head of the Cutler River, indicating Federally qualified subsistence users may need to travel to the confluence of the Cutler and Noatak Rivers in order to harvest caribou in some years. Adoption of this proposal would result in misalignment of Federal and State definitions of the Noatak Controlled Use Area, which is primarily an administrative issue and not a functional one. Technically, Federally qualified subsistence users could still access the Noatak River between Sapun Creek and the Cutler River by plane from Aug. 15-Sep. 30 under Federal regulations, although the likelihood of this is very low. There are no conservation concerns for this proposal.

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

**Rationale:** This proposal would benefit Federally qualified subsistence users. One alternative would be to extend the Noatak CUA to the mouth of the Nimiuktuk River where conflicts between Noatak residents and non-local hunters have been documented. However, caribou migration patterns in recent years may result in negative encounters between local and non-local hunters at the mouth of the Cutler River.

**PROPOSAL 47 – 5 AAC 92.990 (26). Definitions.** Change the definition of “edible meat” for game birds as follows:

**Current Federal Regulation:**

**§100.25(a) Definitions**

*Edible meat means the breast meat of ptarmigan and grouse, and those parts of caribou, deer, elk, mountain goat, moose, muskox, and Dall sheep that are typically used for human consumption, which are: The meat of the ribs, neck, brisket, front quarters as far as the distal (bottom) joint of the radius-ulna (knee), hind quarters as far as the distal joint (bottom) of the tibia-fibula (hock) and that portion of the animal between the front and hindquarters; however, edible meat of species listed in this definition does not include: Meat of the head, meat that has been damaged and made inedible by the method of taking, bones, sinew, and incidental meat reasonably lost as a result of boning or close trimming of the bones, or viscera. For black bear, brown and grizzly bear, “edible meat” means the meat of front quarter and hindquarters and meat along the backbone (backstrap).*

See comments for Proposal 17



# Western Arctic Caribou Herd Working Group

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

Chair: Vern Cleveland, Sr.

Vice-Chair: Cyrus Harris

P.O. Box 175, Nome, AK 99762

December 19, 2016

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

## **SUBJECT: Board of Game Proposals 1, 2, 4, 44 and 45**

To the Alaska Board of Game:

At its December 14-15, 2016 meeting, the Western Arctic Caribou Herd (WACH) Working Group voted to submit the following comments to the Alaska Board of Game on regulatory proposals 1, 2, 4, 44 and 45 for the Arctic/Western Region.

**PROPOSAL 1 – 5 AAC 99.025. Customary and traditional uses of game.** Evaluate a separate amount reasonably necessary for subsistence for the Teshekpuk caribou herd...

Comment The WACH Working Group voted to support Proposal 1.

**PROPOSAL 2 – 5 AAC 92.010. Harvest tickets and reports; and 85.025. Hunting seasons and bag limits for caribou.** Modify the hunt structure of the Western Arctic and Teshekpuk caribou herds ... in Units 21, 23, 24, and 26 by establishing a registration permit hunts within the range of these herds.

Comment: The WACH Working Group voted to support Proposal 2.

**PROPOSAL 4 – 5 AAC 92.085. Unlawful methods of taking big game; exceptions.** Institute no-fly zones for caribou hunting in Units 21D, 22, 23, 24, & 26A ...

Comment The WACH Working Group voted to oppose Proposal 4.

**PROPOSAL 44 – 5 AAC 92.540(9)(A). Controlled use areas.** Modify the area of the Noatak Controlled Use Area in Unit 23 as follows: ... extending upstream to the mouth of the **Cutler River** [SAPUN CREEK].

Comment The WACH Working Group voted to support Proposal 44.





**PROPOSAL 45 – 5 AAC 92.540(9)(A). Controlled use areas.** Require big gam hunting camps to be three miles apart within and near the Noatak Controlled Use Area ...

Comment The WACH Working Group voted to support Proposal 45 with the amended wording below, which was presented to the group by Enoch Mitchell, WACH Working Group member and Noatak/Kivalina Advisor Committee Chair.

Amended working: (iii) Big game hunting camps are required to be located on the south side of [SPACED AT LEAST THREE MILES APART ON] the Agasisuak, Eli, and Squirrel Rivers. This would allow the caribou to migrat with less disruption.

The Working Group took no action on Proposal 3. They noted tha the registration permit hunt established through Proposal 2 would be a better tool to monitor harvest and provide data for herd management.

Thank you for this opportunity to comment.

On behalf of the Western Arctic Caribou Herd Working Group,

*Vern Cleveland Sr.*

Vern Cleveland, Sr., Chair



Submitted By

Todd walter

Submitted On

10/28/2016 10:05:14 PM

Affiliation

Comment regarding PROPOSAL 17 -5 AAC 92.990(26).

Wings of small game birds have traditionally been used as attractants for trapping purposes and I believe should remain so. The amount of meat that could be salvaged is minuscule. Therefore in my opinion the value of the wing for trapping purposes is far greater.



Submitted By  
Ed Schmitt  
Submitted On  
12/22/2016 10:10:26 AM  
Affiliation  
Alaska Wildlife Alliance

Phone  
9072603386

Email  
[schmitt.edward@gmail.com](mailto:schmitt.edward@gmail.com)

Address  
319 Riverside Dr  
Soldotna, Alaska 99669

Proposal 155:

We think this would be a colossal waste of money for an extremely minimal return. Even if the state of Alaska had all the money in the world, spending the hundreds of thousands of dollars this program will cost would be about the worst investment imaginable. Most residents of the Kenai Peninsula would prefer to see ecosystems managed for biological diversity and do not feel that all wolves need to be exterminated so that seven more moose might be killed.



**From:** edward schmitt  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Subject:** Proposal 155, Intensive Management unit 15c  
**Date:** Tuesday, December 20, 2016 4:38:27 PM

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We think this would be a colossal waste of money for an extremely minimal return of possibly seven more moose for hunters to kill. Even if the state of Alaska had all the money in the world, spending the hundreds of thousands of dollars this program will cost would be about the worst investment imaginable. Most residents of the Kenai Peninsula would prefer to see ecosystems managed for biological diversity and do not feel that all wolves need to be exterminated so that seven more moose might be killed.

Edward A Schmitt MD  
Alaska Wildlife Alliance



Submitted By  
Fran Mauer  
Submitted On  
12/22/2016 11:35:13 AM  
Affiliation  
Alaskans FOR Wildlife

Phone  
907-455-6820  
Email  
[fmauer@mosquitonet.com](mailto:fmauer@mosquitonet.com)  
Address  
791 Redpoll Ln  
Fairbanks, Alaska 99712

Comments to the Alaska Board of Game Regarding ACR 155

Submitted by Fran Mauer on Behalf of Alaskans FOR Wildlife

December 22, 2016

Dear Members of the Alaska Board of Game:

I am providing the following comments regarding ACR proposal 155 on behalf of Alaskans FOR Wildlife. We are citizen cooperators living in many locations around the State, and are dedicated to advancing respect and appropriate stewardship of Alaska's great wildlife through education and advocacy.

Proposal 155 would amend and activate a predator control program in Unit 15 C of the Kenai Peninsula that would allow for the removal of all wolves from "public and private lands" within the unit. It would also authorize the continuation of a wolf control program for Unit 15 C until at least 2022.

A wolf control program for 15 C was originally established by the Board in 2012. It was highly controversial at the time and remains so today. The 2012 program has never been implemented. In 2012 the proposal to control wolves in 15 C was added to the Board's agenda at the last minute, without sufficient time for proper review by the public. Also, the 2012 Board meeting was held in Barrow, which is very distant from most of the concerned public. These circumstances resulted in greatly limiting the opportunity for informed comments. Now, it seems the same tactic is in operation again: a last minute announcement for the current proposed action (proposal # 155) and it is to be considered at a BOG meeting in Bethel, far from where most of the concerned citizens reside. The BOG often claims its procedures are a model of excellence in public involvement, however, actions such as this speak otherwise.

The manner in which ACR 155 has been advanced is not consistent with the Board's ACR policy. There is no emergency regarding moose or wolf predation in 15 C; adequate advance notice has not been provided; and the ACR does not explain why the proposed action merits consideration out of the normal sequence of Board schedules. It appears that by the last minute announcement, and by meeting in Bethel, as well as not following your own policies, that you are again attempting to sneak this controversial action past the public with only minimal input, and avoid accountability for your actions.

The 2012 proposal for wolf control in Unit 15 C was seriously flawed in that it attempted to justify killing wolves to improve a low ratio of bull to cow moose which was actually due to hunting rather than wolf predation. The Department of Fish and Game has consistently informed the Board that habitat conditions and hunting are the primary influences of moose abundance on the Kenai. Wolf predation is not a primary factor. Furthermore, Proposal 155 does not provide any evidence that wolf predation is responsible for a 2015 moose harvest in 15 C that happened to fall only 7 moose short of the objective.

No data is provided with #155 regarding the illegal take of moose and the effect of antler regulations on the over-all take of moose in 15 C. A slight modification of antler restrictions (allowing the take of bulls with three, rather than four brow tines) would likely bring the annual harvest within objective levels. Proposal 155's use of the 2015 harvest (7 moose shy of the objective) is an illegitimate justification for invoking wolf control while ignoring alternatives such as modification of antler restrictions. This amounts to no more than a flimsy effort to



keep the 2012 predator program on the books and to inappropriately justify removal of all wolves from the specified area within 15 C s

also an abuse of the very protocols that have been established for the intensive management program.

Alaskans FOR Wildlife are very concerned that although in 2012 the Department informed the BOG that wolf predation was not limiting moose on the Kenai, but rather habitat was the limiting factor, it appears that the BOG intends to kill wolves because wolves take moose that theoretically some hunters might otherwise harvest. This faulty rational, if adopted would set an unacceptable precedent that could ultimately lead to the widespread killing of wolves and bears anywhere in Alaska where there are moose and hunters. Such policy creep goes far beyond the intention of the intensive management law itself.

Intensive management has been in existence for the past 22 years and although many extensive predator control programs have been implemented in various areas of Alaska at a cost of well over a million dollars per year, the State wide harvest of moose has not significantly increased. We can find no convincing information associated with this proposal to indicate that it will be any more successful than all of the wasteful, ineffective efforts of the past. Therefore we are opposed to proposal 155, and urge that you reject it. We also recommend that the BOG not renew the 2012 wolf control program as well, because it too is not justified by sound science or any other sensible rationale.

Thank you for the opportunity to comment.

Sincerely,

Fran Mauer

791 Redpoll Ln

Fairbanks, AK 99712



Submitted By  
Sharon Alden  
Submitted On  
12/20/2016 9:37:13 AM  
Affiliation

This comment is in regards to the proposal to kill all the wolves in Game Unit 15C. This seems both a waste of state resources and a grossly wrong headed move. As those responsible for managing game it should not be your priority to just make more moose available by eliminating any other predators with more than two legs. I have read that 20% of the moose taken in this unit were illegal due to being too young. 20% is a huge amount and by working on education you can more cheaply and sanely manage this resource properly.

Alaska often likes to point out our differences from the lower 48. Let's not follow their lead by wiping out the apex predators who are a vital part of a healthy ecosystem

Sincerely,

Sharon Alden



Submitted By  
Joel Bennett  
Submitted On  
12/20/2016 3:31:05 PM  
Affiliation  
self

Phone  
9077891718

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

Address  
15255 Point Louisa Rd  
Juneau, Alaska 99801

As an Alaska licensed hunter for each of the past 48 years, I strongly oppose Proposal #155, creating a predation control area in GMU 15c for the purpose of removing all wolves by aircraft or other means.

This proposal is of doubtful cost effectiveness, has no biological justification, and does not enjoy wide public acceptance. These are the tests that I believe must be employed to justify wolf control. Moreover, as a hunter I oppose these methods of control as unethical and inhumane, and believe the damage done to our image as responsible hunters in Alaska by such actions is significant. It is time to recognize that the diverse values of wildlife users in this state are poorly served by proposals of this nature.





Submitted By  
Cheryl Blizzard  
Submitted On  
12/21/2016 6:36:37 AM  
Affiliation

Phone  
9074790199

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

Address  
3205 Forrest Drive  
Fairbanks, Alaska 99709

Dear Board of Game Members,

I am very much opposed to the last-minute proposal to remove the wolves from 15C just north of Kachemak Bay. It is bad enough that wolves have been almost eliminated from Denali Park, but now this? It does not make sense to deplete the wolves from this area and, if left unattended, wolves will manage their own population. The moose population has remained steady in 15c with a slight decrease in calf survival (mostly due to black bears). Until studies are conducted to establish a true number of wolf packs in the area, and the impact of predation by wolves and both black and brown bears, I am opposed to even mentioning aerial wolf control.

Yours truly,

Cheryl Blizzard



Submitted By  
Kiche Braendel  
Submitted On  
12/21/2016 1:11:09 AM  
Affiliation

In regards to proposal #155.

The evidence for intensive management is threadbare at best. Using year to year harvest data doesn't tell you anything because of the sheer amount of variables in play. The unit has a high rate of illegal kill which can easily effect the number of legal animals from year to year as well as habitat and winter kill considerations. There isn't any 'scientific' reason to do this. It's just an excuse to shoot wolves for fun. As people we should be better than that.



**From:** Gerald Brookman  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Subject:** Comments on PredatorControl on the Kenai Peninsula  
**Date:** Thursday, December 22, 2016 2:26:07 PM

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To: Alaska Board of Game

From: Gerald R. Brookman, 715 Muir Ave., Kenai, Alaska 99611-8816

I understand that one of the proposals before the Board of Game at its meeting in Bethel is a reduction of predators on moose in Game Management Unit 15(C). I am completely opposed to this proposal, and I urge you to reject it. I believe that there is not a predator problem in this area, but a habitat problem. Those who would like to solve all our problems by simply eliminating predators are, in my opinion, wrong. This plan harkens back to the days of "The only good wolf is a dead wolf". Wolves have an important place in the ecosystems of the Kenai Peninsula, and I hope that you will see fit to completely reject this proposal. I have been an Alaska resident since 1957, and a Kenai Peninsula Resident since 1978.



**From:** roy catalano  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Cc:**

**Subject:** Proposal 155  
**Date:** Thursday, December 22, 2016 5:14:44 AM  
**Attachments:** [Total Moose Harvest 1994-2015.pptx](#)

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Dear Sirs:

I am against proposal 155 in removing all wolves in all public and private lands in the Kenai area.

There never has been convincing scientific data to show that removal of predators, bears or wolves have increased the number of moose or caribou for hunters whether subsistence or not. See attachment above. There has not been an increase since predator control has been in place. More money and effort has been wasted without the results you were looking for.

Another predator control proposal without convincing data is just criminal to think that this action will increase prey animals. The real issue is that there is not enough habitat, food, for moose to eat now, and so killing off predators will not help increase moose. There is need for more habitat to provide food.

Over the last 20 years since the 1994 law, the data release from Alaska Fish and Game show no increase. Why does the state continue to feel this archaic process is going to bring good results. It is like doing the same thing over and over expecting different results.

Let the predators alone and let the ecosystem balance itself.

Roy Catalano  
P.O.Box 353  
Denali, Alaska 99755  
[roycatalano@gmx.com](mailto:roycatalano@gmx.com)

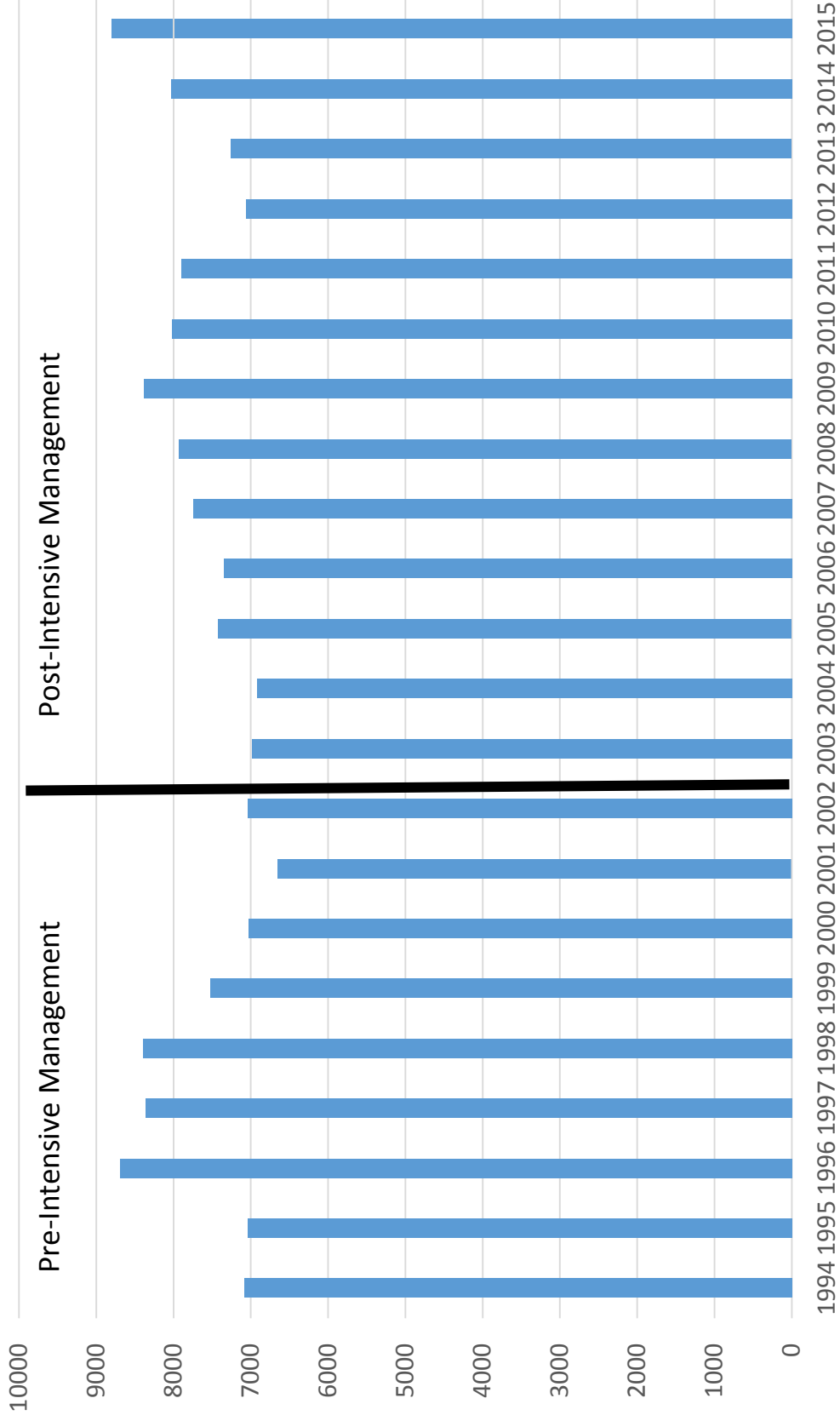
Submitted By  
roy catalano  
Submitted On  
12/19/2016 12:33:10 PM  
Affiliation  
Alaskan FOR Wildlife  
Phone  
719-331-7221  
Email  
[roycatalano@gmx.com](mailto:roycatalano@gmx.com)  
Address  
P.O.Box 353  
Denali , Alaska 99755

I am against wolf predator control in the Kenai Area since the habitat will not support increase moose numbers. A lot of the area is refuge and not available for State predator controls practices. It also has not been proven that predator control through aerial shootings and other methods of killing wolves is effective in increasing the number of wolves.

If habitat improvement is not made to feed additional moose, there is no need to try to increase their numbers through predator control. Suggest leave the balance of nature to take its course.

Roy Catalano

# Alaska Moose Harvest 1994-2015





441 West 5th Avenue, Suite 302 | Anchorage Alaska 99501 | tel 907.276.9453 | fax 907.276.9454  
[www.defenders.org](http://www.defenders.org)

Alaska Board of Game  
ADF&G Boards Support  
PO Box 115526  
Juneau, AK, 99811-5526

December 22, 2016

VIA ELECTRONIC MAIL

Re: Proposal 155

Dear Board of Game:

Established in 1947, Defenders of Wildlife is a national, science-based non-profit conservation organization. With more than one million members and supporters nationwide, including over 3,500 in Alaska, Defenders is focused on conserving and restoring native fish and wildlife species and habitat throughout the country, including federal conservation system units (CSUs) in Alaska. Wolf control activities authorized pursuant to the above-referenced proposal could impact one such unit, the Kenai National Wildlife Refuge, and the proposal appears to further an aggressive general approach to predator control activities that impacts other CSUs in Alaska.

We encourage you to reject Proposal 155, which would reauthorize wolf control activities in Game Management Unit 15C with the new intent of removing all wolves from the area. Neither science nor other public policy considerations demonstrate that wolf control would be appropriate in GMU 15C.

First, as a procedural matter it is unclear why the Board is considering this proposal at its January meeting in Bethel. We do understand that the Board's meeting cycle changed in 2015, with the effect of moving a previously anticipated Kenai Peninsula meeting from March 2017 to March 2019. We further understand that the currently-authorized wolf control program will expire in June 2017, and thus waiting until March 2019 to consider this issue would mean the Department of Fish and Game (ADF&G) would not pursue wolf control in the interim. For the reasons noted below, however, wolf control appears to be unnecessary and unwarranted in GMU 15C and should not be reauthorized, especially at an out-of-region meeting for no compelling reason. The fact that the current predator control program will expire before the next in-region meeting takes place is not, by itself, a good reason to reauthorize it out of region.

Second, the proposal appears to be unwarranted because current moose population and harvest objectives are being met, and because the available scientific information indicates that moose populations are likely to remain stable or increase. The most recent population work produced a point estimate of 3204 moose, above the 2010 estimate of 2919 animals and toward the high end of the 2500-3500 desired population level



for Intensive Management (IM). The 2016 human harvest was 211 animals excluding roadkill, which has averaged 63 animals annually, a significant additional source of human-caused mortality. 5 AAC 92.118(c). This is above the low end of the 200-350 desired IM harvest range. As ADF&G has reported, moose studies prepared by Thomas McDonough et al. over the past few years in GMU 15C indicate that populations can be expected to remain stable or increase; no decline is anticipated.

Third, it is likely that the harvest could be increased through somewhat less restrictive harvest regulations, which the Homer Fish and Game Advisory Council has noted.<sup>1</sup> The harvest had previously been restricted in order to achieve desired bull:cow ratios and those ratios have improved. But the Board has rejected subsequent proposals by ADF&G to boost harvest by removing additional restrictions that are no longer needed to achieve those management objectives. The Board should not pursue the more expensive and extreme tactic of wolf control while rejecting simpler and far more cost-effective regulatory adjustments that can be fully expected to increase moose harvest.

Fourth, the proposal conflicts with the ADF&G's Intensive Management protocol in at least two important ways. For example, principles 2 and 3 of the protocol call for IM to be science-based and socially sustainable, respectively. The available scientific information suggests no need for a predator control program at all. And it appears that the stakeholder engagement deemed necessary to achieve social sustainability, as noted in Guideline 3.2 of the protocol, has not occurred relative to this proposal. There is no indication of substantial stakeholder participation in developing this proposal, and input from the Homer Advisory Council indicates a high level of stakeholder concern and opposition to it. Thus, in acting out of cycle and region, the Board would be continuing a program that has not been implemented to date and does not have the support of local stakeholders. Swimming against the current of science and public sentiment, the reauthorization is also more extreme than the current program in that it seeks to eliminate all wolves from GMU 15C, while the current program seeks to retain a minimum of 15 wolves. 5 AAC 92.118(c)(2).

Finally, all parties likely understand that the proposed activity is prohibited on national wildlife refuge lands within GMU 15C by Fish and Wildlife Service regulation, and we believe the intent of the proposal is to apply only to non-federal lands. The proposal, however, does not make this explicit, and in fact would delete the current program's clear reference to the need for permission from land managers and landowners, including the Fish and Wildlife Service, Kenai Peninsula Borough, and Alaska Native corporate and tribal landowners, before wolf control activities could commence on those lands. See 5 AAC 92.118(c)(3)(E). If this proposal is adopted to any extent, the Board should specify the relevant areas and provide a map where ADF&G could authorize wolf control activities, so the public understanding is clear. The proposal should also restate the need for landowner permission for activities on non-state lands.

For the foregoing reasons, we urge you to reject Proposal 155.

Sincerely,

*Pat Lavin*

Patrick Lavin  
Alaska Representative

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<sup>1</sup> See Homer Fish and Game Advisory Council December 13, 2016 meeting minutes, attached.



**Homer Fish and Game Advisory Committee  
December 13, 2016  
NERRS Building**

**L Call to Order:** 6:10 pm by George Matz, secretary. Tom Young (vice chair) took over at 6:20.

**II. Roll Call**

**Members Present:** Tom Young (vice chair), George Matz (secretary), Ty Gates, Michael Craig, Jim Meesis, Lee Martin, Dennis Wade, Thomas Hagberg, Doug Malone, Marvin Peters, Wes Humbyrd, Joey Alred.

**Members Absent:** Dave Lyon (chair), Phillip Jones, Gary Sinnhuber.

**Number Needed for Quorum on AC:** 8

**List of User Groups Present:** None

**III. Approval of Agenda:** Decided to take up ACR proposals.

**IV. Approval of Previous Meeting Minutes:** NA

**V. Fish and Game Staff Present:** None

**VI. Guests Present:** None

**VII. Old Business:** Brief discussion about BOF meeting.

**VIII. New Business:** Discussion about Upper Cook Inlet BOF proposals to be discussed at the next meeting.

Alaska Board of Game Arctic/Western Meeting

January 6-9, 2017, Bethel

Proposal Number	Proposal Description			
	Support, Support as Amended, Oppose, No Action	Number Support	Number Oppose	Comments, Discussion (list Pros and Cons), Amendments to Proposal
155				Intensive Management Plans IV.
		0	12	<p>The Homer AC unanimously objects to the BOG's recent acceptance (Oct. 23, 2016) of an Agenda Change Request (ACR) that adds Proposal 155 to its agenda for its January 6-9 meeting in Bethel. We believe that accepting this proposal for the January meeting is an improper use of the ACR process because the action being proposed is not an emergency, hence does not need to be considered out-of-cycle and (worse yet) out-of-region. Given the abbreviated time to submit comments (December 22 deadline), there will likely be little if any public review of this long-standing GMU 15C issue. As we have said before (see attached letter by Dave Lyon, Homer AC chair), this issue needs to have local discussion and input before any BOG decision.</p> <p>While it might be theoretically possible for local residents to attend the Bethel meeting to testify in opposition of this proposal, the time and cost for attending the meeting during this time of the year would be prohibitive for most. Written comments might appear to be another option, but given that ACR's essentially fly under the radar screen so that there is limited public awareness, the very limited time before comment deadline, and that many interested locals were distracted by the Board of Fisheries meeting which just concluded in Homer, this</p>





## Alaska Board of Game Arctic/Western Meeting

January 6-9, 2017, Bethel

Proposal Number	Proposal Description		
Support, Support as Amended, Oppose, No Action	Number Support	Number Oppose	Comments, Discussion (list Pros and Cons), Amendments to Proposal
			<p>isn't a reality.</p> <p>According to the BOG's ACR policy (5 AAC 92.005 updated by the board in July, 2015), "boards attempt to give as much advance notice as possible on what schedule subjects will be open for proposals." Furthermore, the ACR "must specify the change proposed and the reason the proposed change should be considered out of sequence." Neither of these important conditions have been met by Proposal 155. Therefore, the ACR that put this proposal on the agenda seems to us to have questionable legal standing.</p> <p>Also, the data provided in Proposal 155 is dubious. It says "Recent population estimates have been within IM objectives, but harvest objectives have not been met in recent years (193 moose harvested in 2015 compared to the 200 moose minimum harvest objective)." The harvest of 193 moose is statistically close to the minimum harvest objective, which could easily be exceeded when bull populations recover (as they are) from very restrictive hunting regulations the past couple of year that were implemented in order to improve bull:cow. This increased harvest will, in essence, nullify the reason for any Intensive Management action. Furthermore, if the known illegal harvest were included in the proposals calculations (Proposal 159 says that from "2013 to 2015 the average reported illegal harvest was 17 percent"), the harvest objective has probably been met in recent years.</p> <p>If the BOG were to consider all feasible options, it might find that reducing the number of brow tines for a legal-sized bull moose from 4 to 3 might create more hunting opportunity and be a more cost-effective to meeting harvest objectives than wolf control.</p> <p>The BOG regulation for ACR's (5 AAC 92.005) says that "the board will not accept an agenda change request that is predominantly allocative in nature in the absence of new information that is found by the board to be compelling." Implementing a 15C wolf control program could be considered allocative, particular when considering that other options (such as reducing the number of brow tines for a legal bull) might be available. The intent of the proposal is to increase moose populations at the expense of wolf populations. Making this choice reduces opportunity for both consumptive and nonconsumptive users who benefit by either trapping of viewing wolves. Accordingly, the decision by the BOG to consider Proposal 155 could be considered a violation of 5 AAC 92.005.</p>



## Alaska Board of Game Arctic/Western Meeting

January 6-9, 2017, Bethel

Proposal Number	Proposal Description		
Support, Support as Amended, Oppose, No Action	Number Support	Number Oppose	<b>Comments, Discussion (list Pros and Cons), Amendments to Proposal</b>

## Alaska Board of Game Interior Region Meeting

Feb. 17-25, 2017, Fairbanks

Proposal Number	Proposal Description		
Support, Support as Amended, Oppose, No Action	Number Support	Number Oppose	<b>Comments, Discussion (list Pros and Cons), Amendments to Proposal</b>
159	Hunter education and orientation requirements		
0	12	<p>The Homer AC again unanimously objects to the BOG's recent acceptance (Oct. 23, 2016) of an Agenda Change Request (ACR) that adds Proposal 159 to its agenda for its February 17-25 meeting in Fairbanks. We believe that accepting this proposal for the February meeting is an improper use of the ACR process because the action being proposed is not an emergency, hence does not need to be considered out-of-cycle and (worse yet) out-of-region.</p> <p>While we acknowledge that killing sublegal bull moose is a problem, now that bull:cow are improving, consideration should be given to allow harvest of bulls with three, rather than four, brow tines.</p>	

Meeting adjourned at 7:10 pm

Minutes taken by George Matz

Approved by: Tom Young, vice chair

Date: 12/15/2016



Submitted By  
Nina Faust  
Submitted On  
12/20/2016 9:57:30 PM  
Affiliation  
  
Phone  
907-235-6262  
Email  
[aknina51@yahoo.com](mailto:aknina51@yahoo.com)  
Address  
P.O. Box 2994  
Homer, Alaska 99603

I am opposed Proposal 155. This controversial proposal would implement an Intensive Management Plan in Unit 15A through aerial wolf hunting and other means. Residents in Homer opposed a similar proposal in 2011. So far the moose population is sufficiently high that it has not triggered implementation.

Aerial wolf hunting has questionable results and benefits few people. A recent article in the Alaska Dispatch News, <https://www.adn.com/opinions/2016/12/16/alaskas-intensive-game-management-isnt-working/>, states that the program is probably costing around a million annually, producing only about 143 additional moose taken each year at a cost of \$7000 per moose.

The science really does not support these methods, and aerial hunting is a very controversial method of killing wolves. I think our money is being wasted on these types of programs. Science-based habitat management would be a much more useful approach.

ADF&G should be putting forth habitat management programs to improve moose habitat. This is a more sensible approach since it would directly address the problem that is causing the low moose numbers. State biologists should work with Kenai Refuge biologists to determine how best to improve moose habitat. The 1969 fire was a real boon to moose but it has long since grown past its prime benefits for that species.

Habitat is the one of the main limiting factors in moose population decline. Scientific studies have verified that poor habitat is depressing population, and it is not predators that are reducing the bull:cow ratio. To conduct an aerial wolf control program is unwarranted and unscientific. The program would be slaughtering one species to make more moose which would then likely die of starvation. This is not only poor management but is also fiscally irresponsible.

Furthermore, I have real concerns about the safety of aerial wolf hunting in this populated GMU. Aerial shooting and land and shoot methods are both difficult to oversee when members of the public are issued permits to use these controversial methods. Both are open to abuse and with tight budgets, adequate oversight is very unlikely.

Please oppose Proposal 155.

Sincerely,

Nina Faust  
P.O. Box 2994  
Homer, AK 99603



Submitted By  
Stephanie Hartman  
Submitted On  
12/21/2016 1:18:01 PM  
Affiliation

Phone  
5099518123  
Email  
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Address  
5801 Jordan Circle  
Anchorage, Alaska 99504

Regarding the Intensive Management program for Unit 15C; please do not activate this program. I am not in favor of predator control in this region, or my state of Alaska, and hope you choose to manage wildlife will all Alaskans in mind.

**Teach value, not vantage, and remember the difference between worth and wealth.**

I am an Alaskan, and I am concerned for the future of wildlife in our state. As a devoted mother and Education Director focused on wildlife education and conservation, I am even more concerned for what our governing officials are teaching our future leaders, and even worse, what we may or may not be leaving behind for them.

For too long our state has taken advantage of our wildlife, favoring ungulate species to the detriment of our top predators. For too long our state has ignored the wildlife professionals and enthusiasts that desire wildlife alive, and favored the hunters, trappers, hunting guides and outfitters who view predators as competition. It is time Alaska remembers the true value of all our wildlife populations and that their worth isn't determined solely by dollar signs.

Wolves and bears play a critical role in the structuring of healthy ecosystems. Their presence is crucial to maintaining the array of other animals and plants encompassing their range of habitats. With continued one-sided, consumption-based management, I am certain that wolf and bear populations (especially wolf populations) will continue to decline at rates that will be detrimental not only to their species, but many others as well.

It is the responsibility of our governing bodies to assure that habitat diversity is maintained through natural means, avoiding artificial developments and habitat-manipulation programs, to allow wildlife populations to persist into the future for the benefit of all citizens.

I look forward to the day greater value and more stringent regulations are implemented to conserve wildlife equally; to the day when Alaska's policies reflect the worth of balanced, synergistic wildlife populations far above any monetary wealth that may be gained by their exploitation.

Thank you for your time and work for the state of Alaska.



Submitted By  
Marybeth S Holleman  
Submitted On  
12/22/2016 2:12:15 PM  
Affiliation

Phone  
19073333381

Email  
[marybeth.holleman@gmail.com](mailto:marybeth.holleman@gmail.com)

Address  
9138 Arlon St Ste. A-3, Box 666  
Anchorage, Alaska 99507

I request that the Board reject proposal 155, IM/wolf elimination in GMU15C, for the following reasons:

1. There is inadequate science to support the elimination of wolves from this portion of the Kenai Peninsula. ADF&G biologists have stated that the moose population in 15C is healthy, the cow to bull ratio is healthy and that area 15C is now at, or near, carrying capacity. As well, numbers of road killed moose, and moose taken illegally, are not adequately considered.
2. There is little local public support for wolf elimination. In fact, the Homer Fish and Game Advisory Committee unanimously opposed wolf predation as a management tool in area 15C.
3. The process by which this was quietly added to the Board agenda at the last minute is suspect and appears to deny public process, and therefore erodes public trust.
4. Taking this up in an out-of-cycle meeting in Bethel, which is not in the region of this proposed predator control, is also suspect, also denies public process, and also erodes public trust in State leadership.
5. IM in such a popular tourism area is certain to corrode the image of Alaska to visitors, and may therefore cost the State money in tourism dollars, while also dealing an economic blow to Kenai Peninsula businesses that, given the State budget crunch, are more vulnerable than ever.
6. The State of Alaska is in a severe budget crunch, and this proposal, given all the above points, is obviously a waste of state monies. Regardless of whether it's paid by hunter fees, this still creates ill will in Alaskans who see such government waste as an affront to the hard times they are experiencing as other valuable services, such as their children's educations, are being cut.

Clearly, this proposal isn't in anyone's interest, and will do far more damage—not just to ecosystem health but to the public's image of the Board and the State government. I urge you to reject it.



Submitted By  
Michael Haukedalen  
Submitted On  
12/22/2016 2:33:56 PM  
Affiliation  
Alaska state director - The Humane Society of the United States  
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907-575-4464  
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Address  
PO Box 111591  
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Alaska Department of  
Fish and Game  
P.O. Box 115526  
1255 W. 8th Street  
Juneau, AK 99811-5526

## **Re: Alaska Board of Game's Proposal 155: Complete Removal of Wolves on Public and Private Lands within Game Management Unit 15C**

Board Members:

On behalf of The Humane Society of the United States ("The HSUS"), the nation's largest animal protection organization, and our Alaska supporters, we submit comments opposed to the Alaska Board of Game's proposed wolf-control program for the area north of Kachemak Bay with the purpose of removing "all wolves" from "public and private lands within the control area (15C north of Kachemak Bay)."<sup>[1]</sup> We strongly oppose Proposal 155 for the reasons that follow.

### **1. The Board of Game's (BOG's) own science in support of the Proposal is not definitive, and contradicts other peer-reviewed research.**

BOG's Intensive Management policies have resulted in widespread removals of native carnivores, including rather alarming reductions in Alaska's grizzly bear populations ([Miller et al. 2011](#)). The BOG's "Intensive Management" policies are politically motivated and not based upon the best available science ([Haber 1996](#), [Miller et al. 2011](#)).

The effect of human persecution of carnivores is often "super additive," meaning that hunter kill rates on wolves, grizzly bears, and other carnivores have a multiplier effect on the ultimate increase in total mortality over what would occur in nature due to breeder loss and pack disruption, and its indirect effects including increased infanticide and decreased pup recruitment ([Creel and Rotella 2010](#), [Bryan et al. 2014](#), [Ausband et al. 2015](#), [Darimont et al. 2015](#)). With the loss of top carnivores, ecosystem structure and function is disrupted, resulting in the "trophic downgrading of planet earth" ([Estes et al. 2011](#), [Ripple et al. 2014](#), [Ripple et al. 2016](#)).

The scientific consensus for the last several decades has generally concluded that carnivores modulate prey populations and make them more vigorous ([Murie 1940](#), [Peckarsky et al. 2008](#), [Mitchell et al. 2015](#)), including removing the sick and weak animals who would die of other natural causes anyway ([Pierce et al. 2012](#), [Monteith et al. 2014](#)). That is why predator-control schemes are an unreliable means of increasing the abundance of ungulates ([National Research Council 1997](#), [Bishop et al. 2009](#), [Hurley et al. 2011](#)). The best available science indicates that widespread elimination of bears, coyotes and wolves is unlikely to make ungulate herds rebound ([National Research Council 1997](#), [Hurley et al. 2011](#), [Mitchell et al. 2015](#), [Prugh and Arthur 2015](#)).

The scientific literature clearly shows that food resources ultimately limit the numbers of large herbivores (e.g., [Monteith et al. 2014](#), [Mitchell et al. 2015](#)). Ungulate survival is absolutely reliant on their ability to gain access to adequate nutrition—but that nutrition can be hindered by myriad causes. In Alaska, migration is an important means for ungulates to obtain better nutrition and avoid predation ([White et al. 2014](#)), but oil fields and roads inhibit connectivity between subpopulations of ungulate herds, creating genetic divisions and limiting reproduction ([Haskell et al. 2006](#), [Wilson et al. 2015](#)). The oilfields in Alaska, with their constant vehicular movement and vehicle-animal collisions, are harmful to caribou reproduction ([Haskell et al. 2006](#)). Furthermore, a warming planet is leading to the decline of both caribou and reindeer, which harms northern indigenous peoples ([Vors and Boyce 2009](#)).

Ungulate populations in portions of the United States have experienced declines over the latter part of the last century because of habitat loss or fragmentation, changes in forage quality, competition with invasive ungulates, predation, disease, hunting, poaching, stochastic weather events, fire suppression, noxious weeds, competition with domestic livestock, energy development, and changes in hydrology



caused by global warming—including changes in snow pack and temperature (e.g., Forrester and Wittmer 2013, Monteith et al. 201

Ungulate declines are not unique to Alaska.

The most current and best available science is clear: predator-control measures intended to restore ungulate herds, such as moose and caribou, are doomed to fail because herds need access to adequate nutrition—their main limiting factor. Alaska's many-decades-long "Intensive Management" program has failed to yield more ungulates for human hunters, and it is the wrong approach to conserving natural systems.

## **2. The Proposal caters to special interests, and does not utilize the resources at issue for the maximum benefit of "the people," in contravention with Article 8 of the Alaska Constitution.**

Section 8 of the Alaska Constitution plainly states that "[t]he legislature shall provide for the utilization, development, and conservation of all natural resources . . . for the maximum benefit of the people." According to the Alaska Department of Fish and Game ("ADF&G") web site, ADF&G's mission is to "manage use in the best interest of the economy and the well-being of the people of the state."

Alaska hunters represent a small minority among "the people" of Alaska. ADF&G issued 103,000 resident hunting licenses in 2015, when the state's population totaled 738,000. Therefore, approximately 14% of Alaska residents are hunters. Both Alaska's Constitution, and ADF&G's own mission, explicitly require fidelity to "the people" of the state – not the special interests of the small minority of Alaskans who purchase hunting licenses.

ADF&G's seven member BOG is the state's regulatory authority "to conserve and develop Alaska's wildlife resources." Each member of the current BOG self-identifies as a hunter; three members have a pecuniary interest in hunting issues and regulations. As hunters represent a small minority of Alaska residents, a truly representative BOG would consist of six "non-consumptive users" and one hunter. Alaska's BOG consistently fails to consider the interests of "the people," but rather, caters to the special interests of hunters. Again, this is both a violation of the state constitution, and contrary to ADF&G's own mission.

A 2016 poll conducted by the Remington Research Group provides objective evidence that refutes the false narrative that most Alaskans agree with ADF&G's management of wildlife resources. The poll found that a clear majority of 1,400 Alaska voters disapprove of a set of four of the cruelest and most unsporting hunting practices ADF&G permitted on Alaska's National Wildlife Refuges (bear baiting, denning, aerial scouting, and the use of steel leghold traps).

[see: [http://www.humanesociety.org/news/press\\_releases/2016/03/alaska-nwr-cruel-practices-030116.html](http://www.humanesociety.org/news/press_releases/2016/03/alaska-nwr-cruel-practices-030116.html)]

The non-hunting majority of Alaska residents enjoy a protected interest in Alaska's wildlife resources. These interests are consistently ignored by ADF&G and the BOG. Proposal 155 imperils non-consumptive residents' constitutionally protected right to (for example) observe or photograph wolves in their natural abundance, by pursuing state-sanctioned slaughter of "all wolves" throughout GMU 15C.

### **In Conclusion:**

We strongly oppose Proposal 155 and the removal of all wolves from GMU 15C. Independent studies refute the Department's own science purported to support IM practices. And the Proposal is not in accordance with the Department's requirement to represent the resource interests of all Alaskans – not the demonstrably small minority of Alaskans that are consumptive users.

Finally, an Alaska wildlife biologist researched ADF&G Annual Reports from 2012-2015. His inquiry into the costs of Intensive Management of wolves in the Upper Tanana/Yukon revealed a cost of \$12,790 per wolf killed in 2013. And in the Koyukuk (GMU 24B) a cost of \$12,692 per wolf killed during 2012-2015. IM costs statewide are in excess of \$1 million per year. Even if the Board is not persuaded by our more detailed commentary, Proposal 155 represents an unnecessary and unconscionable expenditure in the midst of Alaska's devastating fiscal crisis.

Sincerely,

Michael Haukedalen

Alaska State Director for The Humane Society of the United States

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[1] Map at <https://www.adfg.alaska.gov/static/regulations/wildliferegulations/pdfs/gmu15.pdf>.



**From:** Roger Kaye  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Subject:** Proposal 155  
**Date:** Thursday, December 22, 2016 8:55:47 AM

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I have been a hunter in Alaska for 40 years now, and from that perspective I'd like to ask the BOG to reject Proposal 155, specifying intensive predator control in GMU 15C. Such proposals that vilify wolves are a disgrace to the tradition of real hunting. Predators are part of the natural system that many of us participate in through hunting. As well, such programs reflect badly on Alaska.





**From:** Frank Keim  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Subject:** Proposal 155  
**Date:** Thursday, December 22, 2016 7:27:13 AM

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## In reference to Proposal 155

I've been a resident of Alaska for 55 years and would like to express my extreme disappointment and, yes, outrage concerning the Alaska Board of Game's Proposal 155 to kill wolves in District 15C north of Kachemak Bay on the Kenai Peninsula. The motive for doing this is to increase the population of moose in the area for urban hunters. The bogus concept of reallocation has raised its ugly head here (although there were only 7 fewer moose harvested this year than last in the area) and is being used to justify the proposal and possibly the extension of the concept universally throughout the State.

This proposal also flies in the face of statistics presented in an op-ed in the ADN recently by biologist and former member of the Board of Game, Vic Van Ballenberghe, that clearly indicate that in spite of extreme predator control of wolves and bears in other parts of Alaska, moose populations have not risen anywhere in proportion to the number of wolves and bears killed by the State.

Based on these statistics and the bogus use of the concept of reallocation, I ask the Board of Game to reconsider and reject the aggressive (and regressive) policy of intensive management that they instituted in 2002, including the idea of reallocation. This should begin with rejection of Proposal 155 to shoot and kill wolves on the Kenai Peninsula.

Thank you.

Frank Keim  
2220 Penrose Lane  
Fairbanks, Alaska 99709

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*Never doubt that a small group of thoughtful, committed citizens can change the world; indeed, it's the only thing that ever has.* -- Margaret Mead



**From:** Jim & Suzanne Kowalsky  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Subject:** Comment on Proposal # 155  
**Date:** Wednesday, December 21, 2016 11:14:18 PM

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#### COMMENT ON PROPOSAL 155

Submitted to the Alaska Board of Game by Jim Kowalsky for the record on December 20, 2016

I wish to comment on the last minute proposal #155 for the record.

This proposal should be rejected.

The number of moose harvested is not a valid justification for removing wolves.

Wolves are natural predators and have a valuable role to play in maintenance of healthy ecosystems.

I am made aware of ongoing evidence of deterioration of habitat as the principal factor, seemingly ignored in this proposal.

I am aware that similar habitat condition as cause were factors in the rejection of a similar proposal in 2012.

I am aware of a significant unlawful harvest of bull moose and I feel this must be quantified and must be factored into any consideration of proposal 155.

I believe hunter education and also enforcement of hunting regulations should be regulation and promulgated for the Kenai.

I believe habitat improvement should be promoted for this area as an element of Intensive Management to be applied instead, and you need start now.

I note Board venue for board action on 155 is Bethel, far from the Kenai and thus removes opportunity for affected residents to participate directly.

This location makes a mockery of the self praise of the democratic process accorded to the regulatory process.

I believe the removal of natural predators plays directly into the charge that the Alaska Board of Game incrementally moves to the creation of moose and caribou monoculture-like wildland game hunting farms.

Your board Mr. Spraker, and you, will likely discard this observation.

I urge you begin to take these criticisms seriously because your board has earned this reputation. **IT WILL STICK.**

You and yours make mockery of the Alaska Constitution's direction that all Alaskans are stakeholders as you continue to dismiss the non consumptive requests put before you.

It is not our record.

The record, yours and the board's, stains Alaska's reputation.

Here is an opportunity to show some balance by rejecting 155, a flawed proposal, a mockery of fact and of a democratic process.

I urge you take a broader view and reject.

Thank you.

Jim Kowalsky

POBox 10640

Fairbanks, Alaska



**From:** Mark Luttrell  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Subject:** Citizen comments on BOG proposal 155  
**Date:** Tuesday, December 20, 2016 5:20:15 PM

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## Board of Game and ADFG members

I understand that proposal 155, aimed at eliminating all wolves in GMU 15C, is before you. Good public policy should include public hearings regarding sensitive and controversial issues. Eliminating wolves in a well known and loved area creates a controversy. Residents of the Kenai Peninsula would be well served if an explanation accompanied the proposal. Without an explanation, and in light of the recent scrutiny of the failed IM program throughout Alaska and the dim view of State wildlife management, residents are left skeptical and uninformed.

Will you bring this before the public in a forum separate from BOG proceedings?

If you won't bring it before those you serve, at least consider my comments on proposal 155:

First. Eliminating wolves does not correlate with increased number of moose.

Second. Decimating local wolves to satisfy a select and small group of Alaskans (hunters) is not in the best interest of the state. Most Alaskans are not hunters and by far the majority love to see and photograph wildlife. A thriving, sustainable tourist industry relies on seeing wolves and other wildlife.

You all may be too close to it to realize, but Alaska has a poor reputation for wildlife management. Advancing a program that will remove all wolves will only further tarnish the reputation of the Board of Game, the ADF & G and the state itself.

Mark Luttrell  
Seward



Submitted By  
Sean McGuire  
Submitted On  
12/20/2016 9:29:26 AM  
Affiliation

I'm writing today regarding the proposal by Alaska Department of Fish and Game to kill every single wolf in Game Unit 15C. What in the world are these people thinking? All this talk about valuing species that we have been hearing from ADF&G and the Board of Game. Well now let's see if all that talk is real. I have never seen such a blatant attack on one of Alaska's iconic animals. This will be a nasty fight and if it goes through it will be a black eye on a nationwide level. Apparently 20% of male moose taken in this unit are illegal because the hunters are too greedy or ignorant to know what a legal moose is. So in all their wisdom the idea is to make the wolves pay with their lives. This is absolutely beyond the pale and I think it will be seen by the public as a scandal.

Thank you,

Sean McGuire.



Submitted By  
Douglas McIntosh  
Submitted On  
12/22/2016 8:46:09 PM  
Affiliation  
Alaskans FOR Wildlife

Phone  
907 479-6827

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

Address  
2208 Nottingham Drive  
Fairbanks, Alaska 99709

Regarding Intensive Management for Unit 15C:

Vic van Ballenberghe's recent post in the Anchorage Dispatch News shows that on the average IM has no effect on moose harvest and the BOG is wasting \$7000 per each wolf killed. I say moose harvests 7 below the minimum harvest objective does not justify drastic measures like aereal wolf hunting.



Submitted By  
Rika Mouw  
Submitted On  
12/21/2016 3:58:58 PM  
Affiliation

Dear Board of Game Chairman Spraker,  
Regarding Proposal 155 5 AAC 92.108 Identified big game prey populations and objectives and 5 AAC 92.118. Intensive Management Plans IV it concerns the public greatly to see State funds used for politics, such as predator control, especially when the State is in the midst of a multi-billion deficit, with no real solution in sight.

It is egregious to propose a program that does not have the 1) science to back it up, 2) local public support for it, or 3) viable arguments to substantiate it.

In addition, to renew the predator control program aspect to proposal 155, while the BOG meeting is held in Bethel out of cycle, further erodes public trust in State leadership and viability in public policy. The proposal for 15C especially plays very badly in the local public's image both for residents and visitors alike.

The Homer Fish&Game Advisory Committee unanimously opposed wolf predation as a management tool in area 15C. ADF&G biologists have stated that the moose population in 15C is healthy, the cow to bull ratio is healthy and that area 15C is now at, or near carrying capacity.

Has the predator control form of intensive management worked in the past? The science and numbers do not substantiate it. Since there were no state aerial wolf kills in area 15C as proposed in 2012 and with moose numbers being healthy, there are no numbers to support the renewal of predator control or the expenditure for it. ADF&G has recommended less restrictive harvest regulations, which have not been implemented by BOG. There has also been an increased number of illegal takes in recent years. Also, road kills have not been included in harvest statistics by the BOG when considering intensive management considerations (61 average for area 15C). It is time for the State to explore ways to address the serious public policy issues. The IM plan includes habitat enhancement as well as hunter education. Holding hearings on the application of intensive management would be the first step in this process. The predator control program is costly and it reflects politicking rather than serious policy.

The BOG's idea of re-allocating moose from natural predators to hunters is not only a very bad concept, it is conjecture and truly does create a bad image. The totality of this proposal poorly serves the public, especially in a time of extreme state deficits and low credibility. It is time to re-evaluate state priorities.

I strongly urge you to cut this wasteful spending and to recognize the many values of wildlife and the diverse users of Alaska's wildlife in this state.

Sincerely,

Rika Mouw  
P.O. Box 4084  
Homer, Alaska 99603



Submitted By  
Patricia OBrien  
Submitted On  
12/22/2016 8:14:41 PM  
Affiliation

~~Re: Alaska Board of Game's Proposal 155: Complete Removal of Wolves on Public and Private Lands within Game Management Unit 15C - strongly oppose

This is a rushed proposal without an author's name and shocking verbiage. The Department of Fish and Game determination to remove all wolves from public and private lands in Unit 15 C when ADF&G previously told the Board of Game that wolf predation was not limiting Kenai moose. Poor habitat was the issue. This proposal represents a mockery of sound science. I have reviewed the comments of Michael Haukedalen on this proposal and completely agree.

The only credible action that can be taken on this proposal is opposition.



Submitted By  
Rick Steiner  
Submitted On  
12/21/2016 7:11:37 AM  
Affiliation  
independent biologist

I ask that the Board decline proposal 155, which seeks to conduct Intensive Management (wolf elimination) on a large portion of GMU 15C (Kenai Peninsula). I seriously question the process by which this proposal was quietly added to the Board agenda at the last minute by ADFG, and the veracity of the science behind the proposal. Clearly the department's moose data are insufficient, and the target moose harvest should simply be adjusted downward from the minimum of 200. As it is, the harvest last year was only 7 shy of that target.

As is often the case, wolf predation is being blamed for ungulate population dynamics when many other factors are together more significant. If the Board wishes to conduct IM in the area, I request that it be done with non-lethal measures, rather than lethal measures. This is entirely permissible under the IM statute, and worked well previously. Please see our joint letter to the Governor on this matter in August (below).

[The Commissioner declined our reasonable request, using inaccurate information: [http://www.newsminer.com/news/local\\_news/fish-and-game-commissioner-rejects-changes-to-predator-control-methods/article\\_3b6b3cb8-8d30-11e6-ad05-93ac67f8873d.html](http://www.newsminer.com/news/local_news/fish-and-game-commissioner-rejects-changes-to-predator-control-methods/article_3b6b3cb8-8d30-11e6-ad05-93ac67f8873d.html)]

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August 15, 2016

Honorable Bill Walker, Governor

State of Alaska

Office of the Governor

P.O. Box 110001

Juneau, AK 99811-0001

**RE: Requested adjustments to State of Alaska predator control/Intensive Management program**

Dear Governor Walker,

Over the past 13 years, lethal predator control/Intensive Management (IM) in Alaska has expanded dramatically. A graphic display of the increase in predator control areas in Alaska from 2001 - 2014 can be found here:

<http://unbearableterms.tumblr.com/post/72770119451/predator-control-areas#.V5U5kTV5-8A>

The Alaska Department of Fish & Game (ADFG) reports that each year, Alaska predator control programs directly kill approximately 200 wolves, 150 black bears, and 10 brown bears. However, this total does not include the number of pups and cubs that die after being orphaned by the program, nor does this total reflect the increased predator harvest that has resulted from the liberalization of predator take regulations, including liberalization/elimination of bag limits, significant extensions of hunting/trapping seasons for predators, elimination of brown bear tag requirements, baiting/snaring of bears, permitting the take of sows with cubs, permitting use of helicopters to run IM trap lines and bear snare sets, and so on. Clearly, the actual kill in Alaska's predator control/IM program is significantly larger than the total reported.

Alaska's lethal predator control/IM program, as currently practiced, is unscientific, unnecessary, ineffective, costly, unethical, inhumane, and controversial.

Accordingly, we the undersigned Alaska citizens, respectfully request that you make three important and reasonable adjustments to Alaska's predator control/IM program, as currently conducted by ADFG:

- 1. Replace lethal predator control methods with non-lethal methods;**
- 2. Terminate the "collaring for later control," or "Judas wolf" program;**
- 3. Prohibit all IM within 5 miles of federal conservation units.**

As discussed below, you have the authority, indeed the responsibility, to order such adjustments in this state program.

**I. Replace lethal predator control methods with non-lethal methods.**

We recognize that state statute provides authority for IM programs, but statute and regulation do not prescribe what techniques must be used for such.



State law and regulation (5 AAC 92.110 and 115) provide the following IM authority to the ADFG commissioner:

*The commissioner or the commissioner's designee, including contracted agents of other governmental agencies, may reduce [wolf and bear] populations in an efficient manner, by any means, but as safely and humanely as practical, including the use of a helicopter.*

While the state explicitly *prohibits* use of certain methods in its lethal predator control program (e.g., machine guns, bombs, explosives, pits, fire, smoke, electronic night vision scopes, expanding gas arrows, etc.); and generally *authorizes* use of all other methods (lethal and non-lethal); it does not affirmatively *require* use of any specific method. Notably, nowhere does statute or regulation require the use of *lethal vs. non-lethal* methods for predator control/IM.

For instance, while 5 AAC 92.110 *authorizes* the department to lethally gas wolf pups in dens using carbon monoxide, and to otherwise kill pups in dens ("denning") in predator control areas (with the approval of the commissioner), it does not *require* such. And while poison is *authorized* to kill predatory animals (AS.16.35.200), written permission is required from the Board of Game.

Similarly, while statute and regulation *authorize* the use of state employees, helicopters, and other equipment in IM, AS 16.05.783 (e) prohibits such without direct approval of the commissioner:

*The use of state employees or state owned or chartered equipment, including helicopters, in a predator control program is prohibited without the approval of the commissioner.*

We further note in 5 AAC 92.110 (control of predation by wolves) and 5 AAC 92.115 (control of predation by bears) the following:

*After the board has adopted a predation control implementation plan, the commissioner may, at any time during the period for which the plan is in effect, determine whether to implement the plan and may, by regulation, amend the plan to apply additional restrictions in light of circumstances existing at the time of implementation.*

Clearly, implementation and/or amendment of IM plans, including methods to be used, remains within the discretionary authority of your administration.

On this point, we note that during the administration of former Governor Tony Knowles, IM was successfully implemented using *exclusively* non-lethal methods (e.g., translocation, sterilization, diversionary feeding, habitat enhancement through wildfire policies, etc.). These non-lethal methods represent effective alternatives to the lethal control methods.

There are numerous problems with Alaska's current lethal predator control/IM programs, including that they:

- Are based on poor science and inadequate predator/prey population surveys;
- Are not scientifically peer reviewed;
- Do not recognize or protect natural variability of dynamic ecosystems;
- Do not account for the growing ecological impacts of climate change;
- Are designed for mostly urban, not rural subsistence, hunters;
- Are not supported by many Alaska citizens;
- Can result in prey populations exceeding habitat carrying capacity, thus degrading habitat;
- Can lead to unintended consequences, including increasing predation due to immigration of predators into control areas;
- Prioritize consumptive use of wildlife over non-consumptive use, contrary to the Alaska constitution; and
- Produce little scientific evidence that the programs are effective.

It is time for reputable, professional wildlife scientists in ADFG to admit such, and provide scientific leadership on this issue to the Board of Game and commissioner.

Further, it is clear that the state's lethal predator control program is currently financially supported in large part through the federal Pittman-Robertson "Federal Aid in Wildlife Restoration" program. This federal program contributes the single largest component of the annual budget of the ADFG Division of Wildlife Conservation. Although the state maintains that its federal aid accounts do not reflect direct support to actual IM operations, it is apparent that lethal control is indeed being supported, inappropriately, with these federal funds (e.g. collaring for later control, as discussed below). In addition, most of the state's funding for survey and inventory monitoring, and assessment of impacts of the lethal predator control program, derives directly from these federal wildlife restoration funds.

As you know, the U.S. Fish & Wildlife Service is now drafting a new proposed rule to clarify whether such uses by states are permissible, and the U.S. Department of Interior Inspector General is preparing to conduct an audit of the past use of these federal funds by the State of Alaska, paying specific attention to this issue of funds used for lethal predator control. The continuation of the lethal predator control program, with support by these federal wildlife restoration funds, jeopardizes the continuation of this substantial funding source to state wildlife management.

Finally, as aerial lethal control involves chasing and often wounding wolves and bears from aircraft, this can cause significant suffering of animals. As such, this practice violates the state legal requirement to conduct predator control "as humanely as practical." While "humane" is not defined in statute, it is generally taken to require compassion, kindness, and sympathy for animals; and to require that actions cause the least possible harm, pain, and suffering. The practice of chasing, shooting and wounding wolves and bears from aircraft does not meet this legal requirement of humane treatment.

In addition, bear baiting/snaring conducted in GMU 16 is exceptionally cruel and inhumane, as snared bears can struggle and suffer painfully for days before succumbing or being killed.

Governor, you and your ADFG commissioner clearly have the authority to substitute *exclusively* non-lethal IM methods for the lethal methods now in use. The IM surcharge you approved this year can be used to support the non-lethal IM effort. Non-lethal IM will effectively sustain ungulate populations for human harvest, will comply with statute, and will increase public acceptance of state wildlife management.

For the above reasons, we request that you order the substitution of humane, non-lethal predator control options for all lethal control options now in use.

## **II. Terminate the “collaring for later control,” or “Judas wolf,” program.**

Secondly, we ask that you terminate the practice of “Judas wolf” collaring/killing.

As you know, this program places tracking collars on wolves, and then state gunners track the collared wolves back to their family group/den, where as many as possible are then killed by state biologists. The “Judas” animals are often spared in order to lead state gunners to other wolves for elimination.

We note the following in July 7, 2016 correspondence from Bruce Dale, Director of the ADFG Division of Wildlife Conservation:

*A total of 28 wolves were fitted with radio collars since 2005 in the Upper Yukon–Tanana wolf control area. This is the only area where radio-collared wolves have been used to locate wolves during a wolf control program. These wolves were all radio-collared between fall 2011 and spring 2016 (Regulatory years 2011 through 2015; RY11–RY15). A total of 179 wolves were killed by ADF&G during RY11–RY15 in this wolf control program.*

*We estimate that approximately 30% of wolves killed by ADF&G in the Upper Yukon–Tanana wolf control area in the last 5 years were associated with collared wolves.*

Wolves serve a critical role in terrestrial ecosystem stability, and are intelligent, social animals, with strong family bonds. We find it reprehensible that this very sociality and family bond is being lethally exploited in state predator control efforts.

This program adds another layer of concern regarding the inhumane killing of wildlife from helicopters. The program also raises legal questions regarding compliance with FCC licensing of airwaves used for tracking, as well as NEPA compliance.

The “Judas wolf” collaring/killing program is unethical, inhumane, an embarrassment to Alaska, and should be ended immediately.

## **III. Prohibit all IM within 5 miles of federal conservation units.**

Finally, we ask that you prohibit all state predator control/IM programs (lethal or non-lethal) within 5-miles of any federal conservation unit - National Parks, National Preserves, National Wildlife Refuges - to minimize impact on wolves and bears from these conservation units and the consequent erosion of ecological integrity of these national interest lands.

On this point, we note that over the past decade, state IM programs have targeted and eliminated most wolf family groups (packs) from Yukon-Charley Rivers National Preserve, including most of those collared for federal research programs. As a result, the Park Service now concludes that the Preserve is “no longer in a natural state,” and there are not enough survivors in the Preserve to maintain a “self-sustaining population.” In a 5-year period, state IM efforts have killed 90 Preserve wolves from nine packs, and terminated the 20-year federal wildlife research program.

As example in 2013, all 24 members of Yukon Charley’s Seventymile Pack, including two with radio collars, were shot by ADFG-authorized private airplane gunners, eliminating the pack altogether. In 2012 and 2014, ADFG helicopter gunners shot all 19 members of the Lost Creek Pack, including two collared animals, eliminating that pack as well. And in March 2016, state helicopter gunners shot and wounded a female Yukon Charley wolf along the boundary of the Preserve, and then pursued the wounded animal into the Preserve, where they illegally killed her. Of the 18 other wolves killed by state predator control in this area this spring, half were young of the year.

Yet despite the state IM program, calf survival in the Forty Mile Caribou herd has not increased in the past 5 years.

State predator control on the boundaries of federal conservation units is causing significant harm to the ecological integrity of these federal lands, it isn’t achieving the stated goal, and it further erodes the state-federal relationship. This practice needs to end.

In conclusion, the manner in which we conduct our activities, including how we manage and treat our wildlife, is an important reflection of who we are as a society.

Throughout the Murkowski, Palin, and Parnell administrations, Alaska’s predator control programs have grown more aggressive, inhumane, costly, unscientific, ineffective, and unacceptable to most Alaskans. These lethal predator control programs seriously tarnish the image and reputation of Alaska, which in turn poses risk to our sustainable tourism industry.

As you are aware, the National Park Service and U.S. Fish & Wildlife Service have recently published rules restricting lethal predator control on these federal conservation units in Alaska. This welcome federal action reflects a growing national sentiment that such lethal IM programs are inappropriate, and should be ended.

Unfortunately, your administration has, so far, continued aggressive, lethal predator control/IM on other lands in Alaska.

Governor, we are better than this. We need new "rules of engagement" in Alaska's predator control program.

The reasonable adjustments we request here present an opportunity for you to restore responsible wildlife management in Alaska, sustain ungulate populations for human consumption, and honor your commitment to represent the interests of *all* Alaskans.

As a way forward, we encourage you to convene an independent, science-based *Intensive Management Working Group* to examine these, and other such proposals.

We look forward to your positive response.

Very Respectfully,

Vic Van Ballenberghe, Anchorage

Joel Bennett, Juneau

Frank Rue, Juneau

R.T. Wallen, Juneau

Barbara Brease, Healy

Jim Ayers, Juneau

Edward Schmitt, Soldotna

Marybeth Holleman, Anchorage

James Kowalsky, Fairbanks

Mark Luttrell, Seward

Ken Green, Cooper Landing

Anne Coray, Port Alsworth

Nick Jans, Haines

Frank Keim, Fairbanks

Kate Thomas, Cooper Landing

James Kowalsky, Fairbanks

Roger Kaye, Fairbanks

Joan Frankevich, Girdwood

Duane Howe, Homer

Bill Sherwonit, Anchorage

Josh Klauder, Talkeetna

Kaylene Johnson-Sullivan, Eagle River

Johnny Johnson, Anchorage

Jeremiah Townsend, Healy

Jim Hunter, Fairbanks

Kneeland Taylor, Anchorage

Gerald R. Brookman, Kenai

Susan Olsen, Anchorage

Larry Edwards, Sitka



Jill Wittenbrader, Kodiak  
Wayne Hall, Anchorage  
Nancy Kuhn, Fairbanks  
Michelle Wilson Nordhoff, Anchorage  
Frances Inoue, Anchorage  
Rika Mouw, Homer  
Carol Archuleta, Fairbanks  
Nicolene Jordan, Palmer  
Sean Maguire, Fairbanks  
Sharon Aiden, Fairbanks  
Philip S. Marshall, Fairbanks  
Janet Lokken Marshall, Fairbanks  
Nina Faust, Homer  
Fran Mauer, Fairbanks  
Yoriko Freed, Fairbanks  
Soren Wuerth, Girdwood  
Connie Brandel, Anchorage  
Katharine Richardson, Fairbanks  
Scott Chesney, Two Rivers  
Richard Hellard, Juneau  
Kim Behrens, Anchorage  
Jeffrey Merkel, Fairbanks  
Marin Kuizenga, Fairbanks  
Matteo Kuizenga, Fairbanks  
Annika Merkel, Fairbanks  
Laurie Daniel, Homer  
John Gaguine, Juneau  
Tara Walker, Anchorage  
Jeanette Hanneman, Big Lake  
Tima Priess, Ester  
Hugh Rose, Fairbanks  
Cheryl Silcox, Anchorage  
Milli Martin, Homer  
Lori Hanemann, Fairbanks  
Catherine A Allen, Juneau  
Ellen Wolf, Talkeetna  
Timothy C. Lescher, Anchorage



George Harbeson, Homer  
Ed Davis, Fairbanks  
Stephanie Hartman, Anchorage  
Suzanne Kowalsky, Fairbanks  
John Brieby, Wasilla  
Brian Luenemann, Anchorage  
Amanda Motonaga, Soldotna  
Patricia OBrien, Juneau  
John Stone Porter, Talkeetna  
Larry Casey, Eagle River  
Carol Biggs, Juneau  
Nancy Bale, Anchorage  
Terry Cummings, Anchorage  
Dorothy Thompson, Fairbanks  
Barbara Frazer Reed, Palmer  
Steve Kahn, Port Alsworth  
Yasushiro Ozuru, Anchorage  
Marius Panzarella, Anchorage  
Sylvia Panzarella, Anchorage  
Susan Hansen, Fairbanks  
Linda Shaw, Juneau  
Kathryn L. Recken, Cooper Landing  
Cathy Gillis, Anchorage  
Mary Bethe Wright, Anchorage  
John N. Vanderhoff, Cooper Landing  
Michael Haukedalen, Anchorage  
Dean Cornett, Cooper Landing  
Nina Cornett, Cooper Landing  
David L Plant, Palmer  
Matt Felix, Juneau  
Aran Felix, Juneau  
David Beebe, Kupreanof  
Keri Gardner, Anchorage  
Lin Davis, Juneau  
Maureen Longworth, Juneau  
Rebecca Knight, Petersburg



Susan Scherwin, Girdwood  
Martha Smith, Petersburg  
Bill Watkins, Denali Park  
Kristine Hutchin, Eagle River  
Greg Tibbetts, Anchorage  
Jane Tibbetts, Anchorage  
Scott Bailey, Eagle River  
Karen Cameron, Anchorage  
Dave Plant, Palmer  
Penelope Wells, Anchorage  
David Janka, Cordova  
Roger Elkins, Cooper Landing  
Kari Gardey, Anchorage  
Paul Chanek, Chugiak  
Karen Lester, Chugiak  
Robyn Lauster, Anchorage  
Rob Hodge, Anchorage  
Elizabeth Hatton, Anchorage  
Rebecca Noblin, Anchorage  
April Warwick, Anchorage  
Clare M. Hiratsuka, Anchorage  
Peggy Mullen, Soldotna  
Maxine Franklin, Wasilla  
Jan Myers, Anchorage  
Juliette Boselli, Denali Park  
Nancy Podgorski, Wasilla  
Laura E. Davidson, Eagle River  
William M. Dotson, Anchorage  
Sean Rice, Kenai  
Robin H. Scheff, Anchorage  
Linda Boggs, Eagle River  
Jill Garnet, Kasilof  
Joan Galt, Anchorage  
Paul Joslin, Anchorage  
Michelle Anderson, Juneau  
Yolanda De la Cruz, Anchorage



Lynn Mitchell, Palmer

Beverly Cross-Cason, Anchorage

Stefanie Miller, Anchorage

Karen Dechman, Anchorage

Whitney Youngman, Anchorage

Lia Keller, Anchorage

Jerry Garden, Anchorage

Kristen Cassens, Girdwood

Jacquelyn Briskey, Chugiak

Jeffrey Harvey, Palmer

Holly Stanger, Nikiski

Rick Steiner, Anchorage



**From:** Kneeland Taylor  
**To:** [DFG, BOG Comments \(DFG sponsored\)](#)  
**Cc:** [Cotten, Sam R \(DFG\)](#)  
**Subject:** BOG COMMENTS  
**Date:** Thursday, December 22, 2016 11:45:31 AM

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## **LAW OFFICE OF KNEELAND TAYLOR, P.C.**

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December 22, 2016

Board of Game  
P.O. Box 115526  
Juneau, AK 99811  
BY EMAIL: [dfg.bogcomments@alaska.gov](mailto:dfg.bogcomments@alaska.gov)

To the Members of the Board of Game:

It is my understanding that you will take up the issue of wolf control and bear control ON THE KENAI PENINSULA at your meeting in Bethel, in January, 2017. I understand that the issue is whether wolf control and bear control should be reauthorized.

I oppose wolf and bear control on the Kenai Peninsula.

There has been a large fire recently on the Kenai Peninsula, and the fire has vastly improved habitat for moose. Moose numbers are on the increase, but apparently hunters haven't taken as many moose (and of the appropriate gender) as the Department wishes.

Management only for steady, high rates of hunter success disregards the wildlife itself, and has unanticipated negative





consequences. We have seen this with declining Dall Sheep populations, smaller bears on Kodiak island, and coyotes moving into areas where wolf numbers have been dramatically reduced. Extreme predator control is not the answer to fluctuating hunter success rates, and predator control on the Kenai Peninsula is extreme.

Very truly yours,

Kneeland Taylor



Submitted By  
Timothy  
Submitted On  
12/20/2016 11:14:29 PM  
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I am not going to begin my statement by brandishing how many years I have lived in Alaska, in an attempt to insinuate that my opinion is more important than someone else's opinion because of my tenure in this state. In the realative scheme of things, I am new to the state. I have, however, lived in 5 other states for significant periods of time. I have worked for several state and federal fisheries and wildlife agencies while living in those states, including Alaska Department of Fish and Game. What strikes me most by this new porposal 155 to adopt intensive management in area 15C, is that the BOG is basing a decision on this matter on data that is over a year old. I would expect a diligent legislative body to wait a few days until the 2016 moose harvest data is available, and then make a more educated decision.

The other issue I have found with the way our own BOG operates, as opposed to wildlife boards in other states I have worked in, is that the Alaska BOG has increasingly been using predator control as a default. This practice is dated, and it only allows for immediate gratification. Killing the wolves may intitially increase the moose numbers, but the population will soon reach it's carrying capacity, and then plummet to extreme lows due to lack of resources in the absence of natural predation.

A further consideration, is that management unit 15C is adjacent to both Kenai Fjords National Park, and Kenai National Wildlife Refuge. The National Park is one of Alaska's greatest tourist draws, and upwards of 300,000 visitors visit the Park each year. If the Alaska Department of Fish and Game and its BOG wants to see the protected wildlife within the Park continue to thrive and draw tourist dollars, it would be in their best interest to not allow intensive management in unit 15C. Wolves may have vast home ranges, and do not adhere to Park boundaries. This makes them extremely suceptible to anthropogenic and unsportsmanlike control outside of Park borders that otherwise grant them protection. It is in the economic interest of the people of the Kenai peninsula, many of whom depend on tourist dollars, for ADFG to manage 15C with less discriminatory, wiser methods.

Please vote down this proposal 155. As a wildlife enthusiast, biologist, and hunter, it ashames me to see our Alaska Department of Fish and Game being steered toward the wasteful, lazy management practices that are now being proposed by the BOG for unit 15C. Please consider that Alaskan wildife belongs to all of us citizens. Please consider that wolves, which have been here in North America for over two hundred thousand years longer than the first humans, have a right to hunt the same moose we hunt. Please consider that just as hunting is a part of Alaska's great heritage, so are wolves part of that great heritage, and without wolves, Alaska ceases to be great. Thank you for listening to my comment.