INTERIOR REGION PROPOSAL COMMENTS
BY AHTNA TENE NENE’ C&T COMMITTEE

Gloria Stickwan  for Eleanor Dementi
Regional/ Multiple Unit Proposals

Proposal 46 – 5 AAC 92.015(a)(4). Brown bear tag fee exemptions. Reauthorize resident brown bear tag fee exemptions in the Interior/Northeast Arctic Region as follows: By Alaska Department of Fish & Game.

(a) A resident tag is not required for taking a brown bear in the following units:

(4) Units 12, 19, 20, 21, 24, 26, 26(B), and 26(C)

Comments:
We support Proposal 46 to reauthorized resident brown bear tag fee exemption in Interior Region in Unit 12. Eliminating tag fee will increase hunter participation in hunting for brown bears and harvesting them. Brown bears kill calves of moose and caribou. Brown bears should be harvested to reduce killing of calves. Additionally, brown bears in Unit 12 are considered to be at a healthy population.

Proposal 47 – 5 AAC 92.990(26) Definitions. Change the definitions of “edible meat” for all game birds as follows: By Central Kuskokwim Fish and Game Advisory Committee.

“edible meat” means, in the case of a big game animal, except a bear, the meat of the ribs, neck, brisket, front quarters, hindquarters, and the meat along the backbone between the front and backquarters; in the case of a bear, the meat of the front quarters and hindquarters and meat along the backbone (backstrap); For all game birds, the meat from the breast, back, thighs, legs; [in the case of small game birds, except for cranes, geese and swan, the meat of the breast; in the case 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...

Comments:
We support Proposal 47 to change the definition of “edible meat” for all game birds to include the meat from the breast, back, thighs, and legs; included for human use would be wings, gizzard, and heart; optional parts would be head, neck, feet, and other internal organs and skin.

Wanton waste occurs when game birds are harvested and parts of game birds are discarded and thrown away. Edible parts of small game
birds should be included to use all parts of small game birds. Non-edible parts can be used for trapping purposes, too.

**Proposal 48** – 5 AAC. 92.080. Unlawful methods of taking game; exceptions; and 92.085 Unlawful methods of taking big game; exceptions. By Howard Delo. Allow the use of crossbows in restricted weapons hunts as follows:

In order to allow more opportunity for those hunters wishing to use a crossbow while hunting during special hunts like the roadside “targeted hunts” for moose in Southcentral and the Interior, or while hunting in specific game management areas or state refuges around the state where either muzzleloaders or shotguns and bow and arrow are the approved hunting tools, I would like to ask the Board of Game to include the use of crossbows as a fourth approved hunting tool.

**Comments:**

We oppose adding crossbows to unlawful methods of taking game regulations. Adding another method as a hunting tool will promote additional specific hunting areas, and more hunting seasons and dates, especially, in Unit 12 Game Management Unit areas. Specialized hunting areas and hunting season dates would have to be created to allow another hunting tool to be used while hunting.

**Proposal 49** – 5 AAC 92.130. Restrictions to bag limits. Remove the bag limit. Remove the bag limit restriction for resident relatives accompanying nonresident second degree of kindred as follows: By Kyle Jones.

This new regulation does not solve any issues in the Arctic, Western, Interior or Eastern Arctic regions and Units 12, 18, 19, 20, 21, 22, 23, 24, 25, 26A, 26B, and 26C should be excluded from the regulation.

**Comments:**

We oppose Proposal 49 to remove the bag limit for resident relatives accompanying nonresident second degree of kindred. Brown bears, mountain goats, and sheep taken by nonresident hunters that are accompanied by resident relative should apply to both of their bag limits. Bag limits of guided species should apply to both resident relatives and non-resident relatives to protect Mountain Goats and Rams in Interior/Northeast Arctic Regions.

**Proposal 50** – 5 AAC 92.130. Restrictions to bag limit. Remove the bag limit restriction for resident relatives accompanying nonresident second degree of kindred for the Interior Region as follows: By Chris Harper.
Everyone who wishes to hunt in a nonsubsistence area should have equal opportunity to pursue the “guided” species of Alaska. While I believe that proposal 51 should be repealed statewide, in the setting of an Interior board meeting, I propose that recently passed proposal 51 should not apply to this region.

Comments:

See comments under Proposal 49.

Proposal 51 – 5 AAC 85.045. Hunting seasons and bag limits for moose; and 85.055. Hunting seasons and bag limits for caribou. Prohibit nonresident hunting of any prey species under intensive management in the Interior/Northeast Arctic Region until harvest and population objectives are met as follows: By Resident Hunters of Alaska.

Nonresident hunting shall not be allowed for any prey species in the Interior/Northeast Arctic Region under an intensive management (IM) predation control plan until the minimum IM population and harvest objectives for that prey has been reached.

Comments:

We support Proposal 51 to dis-allow Non-residents hunting in IM areas for moose and caribou. Intensive Management is set up to enhance moose and caribou populations, so that Resident hunters could harvest moose and caribou. Non-Resident hunters should not be allowed to harvest a moose or caribou, if IM Plan is active. If the Department determines that moose and caribou population objectives has been met for moose and caribou, then Non-Residents should not be allowed to hunt. Resident hunters harvest moose and caribou to put food on the table, Non-Resident hunters only do sport hunting.

Proposal 53 – 5 ACC 85.025. Hunting seasons and bag limits for caribou. Clarify the resident general and subsistence hunting seasons and the nonresident general hunting seasons for caribou in Interior/Northeast Arctic and the Arctic/Western Regions as follows:

By Al Barrette

<table>
<thead>
<tr>
<th>Season</th>
<th>Resident</th>
<th>NonResident</th>
</tr>
</thead>
<tbody>
<tr>
<td>Open Season</td>
<td>Open</td>
<td>Open</td>
</tr>
</tbody>
</table>

Unit 12, that portion west of the
Glenn Highway (Tok Cutoff) and South of the Alaska Highway open season within Tok River drainage Sept. 1-Sept. 20 No Subsistence

1 bull

1 bull by registration west of the Glenn Highway (Tok Cutoff) and south of the Alaska Highway, excluding the Tok River drainage Sept. 1-Sept. 20 No

**Subsistence**

Remainder of Unit 12

| 1 caribou may be taken by open season | (Winter season to Announced) |
| Registration permit only | During a winter season to be announced by emergency order |

**Comments:**

We oppose Proposal 53 to change 5 AAC 85.025 Clarify the resident general and subsistence hunting seasons and the nonresident general hunting seasons for caribou in Interior/Northeast Arctic and the Arctic/Western Regions.

We do not support changing “general season” to “subsistence hunt” for Interior Region - Unit 12 and Unit 20 - Caribou hunts having positive C&T use findings.

General hunt is not a subsistence hunt. General Hunt is a “sport Hunt”. General Hunt doesn’t have C&T uses, nor is it understood in its meaning to have a C&T pattern of uses or “way of life”. Subsistence Users have a pattern of C&T uses that is the difference between a General Hunt and a subsistence hunt.

Subsistence Hunts, such as Unit 12, will be negatively affected by this proposal. ANS will have to be re-evaluated, if this proposal is passed by ABOG. Unit 12 Caribou hunt may end up as a “sport hunt”.

With cut backs to ADFG’s administration, funds are not available to undertake a huge change to Chapter 85 regulations.

**Proposal 54** – 5 AAC 85.015. Hunting seasons and bag limits for black bear. Change “general season” to “subsistence hunt” for
Interior/Northeast Arctic Region black bear hunts having customary and traditional use findings as follows: by Al Barrette.

<table>
<thead>
<tr>
<th>Units and Bag Limits</th>
<th>Resident</th>
<th>NonResident</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Season</strong></td>
<td>Open</td>
<td></td>
</tr>
<tr>
<td>Units 12, 18, 19, 20 outside the Fairbanks nonsubsistence area, 21, 22, 23, 24, 25 (General hunt only)</td>
<td>No closed season</td>
<td>No closed season</td>
</tr>
</tbody>
</table>

**Subsistence**

Comments:

We oppose Proposal 54 to change “general season” to “subsistence hunt” for Interior/Northeast Arctic Region - Unit 12 and Unit 20 black bear hunts having positive C&T use findings.

Please see comments under Proposal 53, those comments pertain to Black Bear hunts in this proposal, too.

**Proposal 55** – 5 AAC 85.045. Hunting seasons and bag limits for moose. Clarify the resident general and subsistence hunting seasons and the nonresident general hunting seasons for moose in Units 12, 19, 20, 21, and 24 as follows: By Al Barrette

<table>
<thead>
<tr>
<th>Units and Bag Limits</th>
<th>Resident</th>
<th>NonResident</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Season</strong></td>
<td>Open</td>
<td></td>
</tr>
<tr>
<td>Unit 12 that portion including all drainages into the west bank of the Little Tok River, from its headwaters in Bear Valley at the intersection of the unit boundaries of Units 12 and 13 to its junction with the Tok River, and all the drainages into the south bank of the Tok River from its junction with the Little Tok River to the Tok Glacier</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

RESIDENT HUNTERS:
1 bull per harvest report by community harvest community harvest Aug. 24-Aug.28
permit only; however, no more than 100 bulls that do not meet antler restrictions for other resident hunts in the same entire community harvest area during the Aug. 24-Aug. 28 and Sept. 9-Sept. 17 seasons; or 1 bull with spike-fork antlers or 50-inch antler or antlers with 4 or more brow tines on one side

NONRESIDENT HUNTERS:
1 bull with 50-inch antlers or Antlers with 4 or more brow Tines on one side

General Season

Unit 12, remainder of that portion In the Tok River drainage Upstream from the Tok Cutoff Bridge

RESIDENT HUNTERS:
1 bull with 50-inch antlers or Antlers with 4 or more brow tines on one side Subsistence

General Season

NONRESIDENT HUNTERS:
1 bull with 50-inch antlers or Antlers with 4 or more brow tines on one side

General Season

Unit 12, that portion lying East of the Nabesna River and south of the winter trail running southeast from Pickeral Lake to the Canadian Border

1 bull with 50-inch or antlers with 4 or more brow tines on one side
Unit 12, that portion within the Nabesna River drainage west of the east bank of the Nabesna River upstream from the southern boundary of the Tetlin National Wildlife Refuge

12 bull with spike-fork antlers or 50-inch or antlers with 3 or more brow tines on one side, by registration permit only

NONRESIDENT HUNTERS: 1 bull with 50-inch antlers or antlers with 3 or more brow tines on one side, by registration permit only

NONRESIDENT HUNTERS: 1 bull with 50-inch antlers or antlers with 3 or more brow tines on one side, by registration permit only

General Season

Remainder of Unit 12

RESIDENT HUNTERS: 1 bull

Sept. 8-Sept. 17

Subsistence

NONRESIDENT HUNTERS:

1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side

General Season

Unit 20(C)

RESIDENT HUNTERS: 1 bull

Sept. 1-Sept. 25

Subsistence

NONRESIDENT HUNTERS:
1 bull with 50-inch antlers or Sept. 1-Sept. 25 antlers with 4 or more brow tines on one side

**General Season**

**Comments:**

We oppose Proposal 55 to change “general season” to “subsistence hunt” for Interior/Northeast Arctic Region - Unit 12 and Unit 20 Moose hunts having positive C&T use findings.

Please see comments under Proposal 53, those comments are relevant to this proposal.

**Proposal 63** – 5 AAC 92.085. Unlawful methods of taking big game; exceptions. Remove the restriction on the use of aircraft for spotting Dall sheep in the Interior/Northeast Arctic Region as follows: By John Frost.

Repeal the regulation passed by the Board-generated proposal #207 for the Interior/Northeast Arctic Region (Units 12, 19, 20, 21, 24, 25, 26B and 26C).

**Comments:**

We support Proposal 63 to remove the restriction on the use of aircraft for spotting Dall sheep in the Interior/Northeast Arctic Region - (Unit 12 and Unit 20). It will be difficult for Troopers to enforce. The intent of the pilot would be difficult to determine in court. No one will know if the pilot was attempting to land an aircraft in a safe manner or was trying to spot Dall sheep.

**Proposal 66** – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. By Michael Cronk. Open an archery-only hunting season for Dall sheep in the Interior/Northeast Arctic Region as follows:

Provide for an August 1-9 archery (conventional bows only) sheep season in all areas of the Interior and Eastern Arctic region (Units 12, 19, 20, 21, 24, 25, 26B, 26C) that are open for general (harvest tag) hunts (not for drawing hunt areas).

**Comments:**

We oppose Proposal 66 to open an archery-only hunting season for Dall sheep in the Interior/Northeast Region. According to ADFG, Unit 12 is the most popular place in the State of Alaska to hunt Dall sheep.
Archery-only hunt will just provide another opportunity for more hunters to hunt for Dall sheep in Unit 12. Creating another sheep hunt will reduce Ram population in Unit 12, this genetic pool of species will be taken out of the Dall sheep population.

**Proposal 67** – 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures. Lengthen the season for bear baiting in the Interior/Northeast Region as follows By Michael Cronk.

We are allowed to register bait stands on April 1, but cannot bait until April 15. The new regulation would state, you may register and place bait in the field on April 1.

**Comments:**

We support Proposal 67 to lengthen the season for bear baiting in the Interior/Northeast to April 1 to June 30. Hunters who bait bears should be allowed to bait on the date that they are registered to have a bait station. Bears are up and moving earlier and earlier in the season, due to thawing and warmer spring months.

**Proposal 68** – 5 AAC 85.045. Hunting seasons and bag limits for moose. Change the “any bull” or “one bull” to “any antlered bull” for all moose hunts in the Interior/Northeast Arctic Region as follows: by Delta Fish and Game Advisory Committee.

Change the bag limit for all “any bull” moose hunts to “any antlered bull” in those units within the Interior/Northeast Arctic Region.

**Comments:**

We support Proposal 68 to change the “any bull” or “one bull” to “any antlered bull” for all moose hunts in the Interior/Northeast Arctic Region. Changing regulation to “any antlered bull” moose should protect male calves (moose) from being harvested. One bull or any bull moose should be regulated so that hunters will not mistakenly harvest a male moose calf.

**Proposal 69** – 5 AAC. 85.045. Hunting seasons and bag limits for moose. By Nicholas Muche, Zachri Kendl, and Kyle Moll. Lengthen the archery-only hunting seasons for moose in Unit 20 and open an archery-only hunting season for moose in all of Unit 20 as follows:

Extend the current archery only, antlered moose hunts in Unit 20 by five days from the current September 6-September 30 to September 26-October 5 and allow all of Unit 20 an archery only season for antlered moose from September 26-October 5.
Comments:

We oppose Proposal 69 to extending archery only hunt for moose in Unit 20 and to open an archery-only moose hunting season. Extending the archery only moose hunting season and opening an archery only moose hunting season will provide another opportunity for more hunters to hunt for moose in Unit 20. Influx of moose hunters in Unit 20 has steadily increased over the years. It is difficult for local hunters to harvest a moose in nearby areas, due to increased hunting pressure.

Proposal 70 – 5 AAC. 85.045. Hunting seasons and bag limits for moose. By Michael Coots. Open a resident disabled veteran season for moose in the Interior/Northeast Arctic region as follows:

I propose those hunters meeting the criteria be allowed to hunt/harvest moose under the following guidelines. For resident veterans only, for the Interior/Northeast Arctic region, any unit/sub/unit with a healthy moose population, bull/cow ratio, qualified veterans would be allowed to harvest any moose, with the exception of calf or cow with calf/calves. In areas with a poor balance/ratio of bull to cow or vice versa, the individual would be allowed to harvest whichever sex the Alaska Department of Fish and Game deemed to be best/proper. No antler restrictions would apply. Qualified veterans must be 100% service connected disabled, with a purple’s heart and receiving special monthly compensation. (SMC) form the Veterans Affairs. Proxy hunting for these individuals would not be allowed.

Comments:

We support Proposal 70 to open a disabled resident veteran’s hunting season for Bull Moose or Cow Moose without calves in the Interior/Northeast Arctic Region, if moose population can be sustained. There may not be too many disabled resident veterans who would participate in such a moose hunt. Disabled veterans should be allowed to hunt for moose and harvest a moose to feed themselves and/or their families.

Proposal 71 – 5 AAC 92.080. Unlawful methods of taking game; exceptions; 92.085. Unlawful methods of taking big game; exceptions; and 92.990. Definitions. By Jim Sackett. Allow the use of crossbows in archery hunts in Unit 20 for hunters over 60 as follows:

Alaska residents 60 years and older in possession of a permanent identification card are authorized/allowed to use a crossbow in any archery designated hunt in Unit 20.
See comments under Proposal 48.

Comments:

**Proposal 72** – 5 AAC 92.095. Unlawful methods for taking furbearers; exceptions, and 92.110. Control of wolves. Allow the harvest of wolf and coyote by land and shoot with a trapping license in the Interior/Northeast Arctic Region as follows: By Coke Wallace.

Allow land and shoot means for harvesting of wolves and coyotes and in Unit 12, 13, 19, 20, 21, 24, 25, 26B and 26C on a trapping license for both residents and nonresidents during the regular trapping season.

Comments:

We support with amendment to Proposal 72 to allow harvest coyotes by residents by land and shoot means with a trapping license in the Interior/Northeast Arctic Region. Coyotes prey upon small game and upland birds, land and shoot means will diminish its’ increasing population.

Non-residents should not be allowed to land aircrafts and shoot coyotes in Alaska. Non-residents do not have hunting experiences in Alaska to land an aircraft and shoot coyotes.

**Proposal 73** – 5 AAC. 92.990. Unlawful methods of taking fur animals.
By Delta Junction Fish and Game Advisory Committee. Allow the use of dogs to hunt coyote in Unit 20 as follows:

Dogs may be used to hunt coyote in Unit 20.

Comments:

We support Proposal 73 to allow the use of dogs to hunt coyotes in Unit 20. Although, hunting with dogs, with their constant barking, may chase away coyotes. More coyotes must be killed to protect upland birds and small game.

**Tok Area Proposals**

**Proposal 84** – 5 AAC 84.270. Furbearer trapping. Lengthen the trapping season for wolf in Units 12 and 20E as follows: by Upper Tanana Fortymile Fish and Game Advisory Committee.

Change the opening date of the Unit 12 and 20E wolf trapping season to October 1.
Comments:

We support Proposal 84 to lengthen the trapping season for wolf in Units 12 and 20E, to October 1 to April 30. There is no conservation concern for wolves in Unit 12. Lengthening trapping season for wolf will provide more opportunity for trappers to trap wolves. Wolves prey upon calves of moose and caribou, wolf population should be reduced to maintain a healthy abundance of moose and caribou and other wild game.

Proposal 85 – 5 AAC 85.025. Hunting seasons and bag limits for caribou. By Aaron Bloomquist. Open a resident drawing hunt for caribou (Nelchina) in Unit 20E as follows:

Unit 20E, south of an east/west line running through the West Fork bridge on the Taylor Highway
(Lat 63.89) N:
One caribou by drawing permit (residents only)
September 1-September 30 and October 21-March 31.

Comments:
We oppose Proposal 85 to open a drawing hunt for Nelchina Caribou Herd in Unit 20E. The proponent proposes a drawing hunt, a drawing hunt is not a subsistence hunt. A Draw hunt or any hunting season for Nelchina Caribou Herd should not be opened to Residents in Unit 20E. Mingling of caribou herds is not a good reason to open caribou subsistence hunts to residents.

A severe winter could bring the Nelchina Caribou Herd down to its management objectives, and also bring the caribou population down below management objectives. Opening a draw hunt is not advisable, it is against subsistence statutes.

Proposal 88 – 5 AAC. 85.045(a)(10). Hunting seasons and bag limits for moose. By Alaska Dept. of Fish and Game. Clarify the boundary of the Unit 12 antler-restricted moose hunting area within the Tok River drainage as follows:

<table>
<thead>
<tr>
<th>Resident</th>
<th>Open</th>
</tr>
</thead>
<tbody>
<tr>
<td>Season</td>
<td></td>
</tr>
<tr>
<td>(Subsistence and Nonresident General Hunts)</td>
<td>Open</td>
</tr>
</tbody>
</table>

(10)
Unit 12, remainder of that portion
In the Tok River drainage upstream
of a line from Peak 5885 at 63°
9.243 N. lat., 143° 24.248 W. long., to
Milepost 105 of the Tok Cutoff Highway
At 63° 7.438' N. lat., 143° 18.135 W. long.,
then south along the Tok Cutoff Highway
to the Little Tok River Bridge
at Milepost 98.2; and within the
Little Tok River drainage
Upstream of the Little Tok River
Bridge at Milepost 98.2 [FROM THE
TOK CUTOFF BRIDGE].

RESIDENT HUNTERS:
1 bull with spike-for antlers Aug. 24-Aug. 28
or 50-inch antlers or antlers Sept. 8-Sept. 17
with 4 or more brow tines
on one side.

NONRESIDENT HUNTERS:
1 bull with 50-inch antlers or Sept. 8-Sept. 17
antlers with 4 or more brow
tines on one side.

Comments:

We support Proposal 88 to clarify the boundary of Unit 12 antler-
restricted moose hunting area within the Tok River drainage as
proposed in this proposal. Modifying boundary will give public and
enforcement clear understanding where Unit 12 boundary is.

Proposal 89 – 5 AAC 85.045 Hunting seasons and bag limits for moose.
By Upper Tanana/Fortymile Fish and Game Advisory Committee.
Change the antler restrictions for moose in Unit 12 as follows:

A legal bull moose is spike/fork, 50-inch antlers or a bull with no more
than two brow tines on either side if under 50-inch antlers excluding
hunt RM291 (along Nabesna Road).

Comments:

We support Proposal 89 to change the antler restriction for moose in
Unit 12 to spike-fork, 50 inch antlers or a bull with no more than two
brow tines on either side if under 50-inch antlers. There is no
conservation as of now. Changing antler restrictions to 2 brow tine will aide moose population to grow into larger bull population.

**Proposal 90** – 5 AAC.92.074(d) Community subsistence harvest hunt areas. By Ahtna Tene Nene’ Customary and Traditional Use Committee. Expand the Community Harvest Area for moose and caribou: Includes all of:

(2) that portion including all drainages into the west bank of the Little Tok River, from its headwaters in Bear Valley at the intersection of the unit boundaries of Unit 12 and Unit 13 to its junction with the Tok River, and all drainages into the south bank of the Tok River, from its junction with the Little Tok River to the Tok Glacier, and that area westerly of the of the easternmost bank of the Copper River and drained by all tributaries into the west bank of the Copper River from Miles Glacier north to the confluence with the Slana River drainage north of the south bank of Suslota Creek, and that portion within the Nabesna River drainage west of the east bank of the Nabesna River upstream from the southern boundary of the Tetlin National Wildlife Refuge.

Comments:

We support Proposal 90, if improvements are made to the community subsistence hunt. This proposal should be delayed to the March 2017 ABOG meeting.

**Proposal 91** – 5 AAC.85.065. Hunting seasons and bag limits for small game. By Lee Adler. Modify the hunting season and bag limits for grouse in Unit 12 as follows:

In Unit 12, a daily bag limit of five grouse per day with a possession limit of ten, except two per day and possession limit of four, for ruffed grouse August 20 – November 10.

Comments:

We support Proposal 91 to a limit of five grouse per day with possession limit of ten, two per day and possession limit of four, for ruffed grouse with a hunting season from August 20 – November 10. During the fall months, too many non-local hunters are over-harvesting grouse and Ruffed Grouse. Ruffed grouse is abounding in population, these upland birds need to be protected from overzealous hunters.

**Proposal 125** – 5 AAC 85.045(a)(18). By Alaska Department of Fish & Game. Hunting seasons and bag limits for moose. Authorize the antlerless moose season in Unit 20A as follows:
## Resident

<table>
<thead>
<tr>
<th>Nonresident Units and Bag Limits</th>
<th>Open Season (Subsistence and General Hunts)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Open Season</strong></td>
<td></td>
</tr>
<tr>
<td>Unit 20(A), the Ferry Trail</td>
<td></td>
</tr>
<tr>
<td>Management Area, Wood River</td>
<td></td>
</tr>
<tr>
<td>Controlled Use Area, and the Yanert Controlled Use Area</td>
<td></td>
</tr>
</tbody>
</table>

### RESIDENT HUNTERS:

<table>
<thead>
<tr>
<th><strong>Unit</strong></th>
<th><strong>Permit</strong></th>
<th><strong>Dates</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1 bull with spike-fork Antlers or 50-inch Antlers or antlers with 4 or more brow tines on one side; or</td>
<td>Sept. 1-Sept. 25 (General hunt only)</td>
</tr>
<tr>
<td></td>
<td>1 antlerless moose by drawing permit only; up to 2,000 permits may Be issued the Remainder of Unit 20(A); a person may not take a cow accompanied by a calf; or</td>
<td>Aug. 15-Nov. 15 (General hunt only)</td>
</tr>
<tr>
<td></td>
<td>1 antlerless moose by registration permit only; a person may not take a cow accompanied by a calf; or</td>
<td>Oct. 1-Feb. 28 (General hunt only)</td>
</tr>
<tr>
<td></td>
<td>1 bull by drawing permit Only; up to 1,000 permits may be issued in combination with the Remainder of Unit 20(A); or</td>
<td>Sept. 1-Sept. 25 (General hunt only)</td>
</tr>
<tr>
<td></td>
<td>1 bull by drawing</td>
<td>Nov. 1-Nov. 30</td>
</tr>
</tbody>
</table>
permit only; by (General hunt only)
muzzleloader only; up to 75 permits may be issued in combination with nonresidents in Unit 20(A); or

1 moose by targeted Season to be announced permit only; by shotgun or bow and arrow only; up to 100 permits may be issued

NONRESIDENTS HUNTERS: Sept 1.-Sept. 25
1 bull with 50-inch antlers or antlers with 4 or more brow tines on one side; or

1 bull with 50-inch Antlers or antlers with 4 or more brow tines on one side, by drawing permit only; by muzzleloader only; up to 75 permits may be issued in combination with residents in Unit 20(A);

Remainder of Unit 20(A) Sept. 1-Sept. 25
RESIDENT HUNTER 1 bull with spike-fork Antlers or 50-inch antlers or antlers with 3 or more brow tines on one side; or

1 antlerless moose by drawing permit only; up only)
to 2,000 permits may be issued in combination with Unit 20(A), the Ferry Trail Management Area, Wood River Controlled Use Area, and the Yanert Controlled Use Area; a Person may not take a cow accompanied by a calf, or

1 antlerless moose by registration permit only; a person may not take a cow accompanied by a calf; or

1 bull by drawing permit only; up to 1,000 Permits may be issued in combination with Unit 20(A), the Ferry Trail Management Area, Wood River Controlled Use Area, and the Yanert Controlled Use Area, or

1 moose by targeted permit only; by shotgun or bow and arrow only; up to 100 permits may be issued

NONRESIDENT HUNTERS:

1 bull with 50-inch Antlers or antlers With 4 or more brow Tines on one side

Comments:
We oppose Proposal 125 to re-authorize the antlerless moose season in Unit 20A. We do not harvest antlerless cow moose, especially cow moose with calves. Cows with calves may be incidentally harvested by hunters. It is against our cultural practice to hunt and harvest cows with calves. Cows could be carrying young and could be killed by hunters.

Proposal 127 – 5 AAC.85.045. Hunting seasons and bag limits for moose. By Jake Spankle. Change the antler restrictions for moose hunting in Unit 20A as follows:

Unit 20A will return to any bull. Should the Department of Fish and Game feel the harvest gets too high, they can adjust the season dates accordingly. If the still want to keep the bull harvest lower, they can put nonresident hunters—who care more about harvesting a trophy animal than filling their freezers anyways—on antler restrictions.

Comments:

We oppose Proposal 127 to change the antler restriction for moose in Unit 20A to an Any Bull moose hunt. This proposed change will create more hunting pressure in Unit 20A. During the community subsistence moose and caribou hunting season, local subsistence hunters were impacted by hunting pressure. Opening up Unit 20A to an Any Bull Moose hunt will further exacerbate moose and caribou hunting season.

Proposal 128 – 5 AAC.85.045. Hunting seasons and bag limits for moose. By Leonard Jewkes. Change the antler restrictions for moose hunting in Unit 20A as follows:

Change the Unit 20A to any bull for residents and 50-inch or three brow tines for nonresidents. Keep the hunt dates of September 1 until the 25 the same. The Department of Fish and Game may in the future change the season dates to maintain a healthy moose population.

Comments:

See comments under Proposal 127.

Proposal 129 – 5 AAC.85.045. Hunting seasons and bag limits for moose. By Jeff Barney. Change the antler restrictions for moose hunting in Unit 20A as follows:

Unit 20A: Change the season to any bull and the Alaska Department of Fish and Game (ADF&G) can adjust the length of the season if they feel too many bulls are being harvested. If ADF&G has a concern about the number of bulls being taken – then nonresidents should be put on
antler restrictions of spike/fork/50 inch antlers before the season is shortened for residents. This unit and all game management units in Alaska should be managed for maximum benefit to Alaska residents. No antlerless permits should be issued under any circumstances.

Comments:

See comments under Proposal 127.

Proposal 135 – 5 AAC. 84.270(14). Furbearer trapping. By Mike Turner. Lengthen the trapping season for wolverine in Unit 20C as follows:

Wolverine, west of the Parks Highway in Unit 20C trapping season is open from November 1 to March 31.

Comments:

We support Proposal 135 to lengthen the trapping season for wolverine in Unit 20C to November 1 to March 31. Local trappers will have more opportunity to trap wolverines. Incidental trapping of wolverines occur when trapping for other species, trappers should be allowed to keep wolverines that they trap.

Proposal 138 – 5 AAC 85.020. Hunting season and bag limits for brown bear. By Fairbanks Fish and Game Advisory Committee. Lengthen the hunting season for brown bear in Units 20A and 20B remainder as follows:

<table>
<thead>
<tr>
<th>Resident Open Season</th>
<th>Nonresident Open Season</th>
</tr>
</thead>
<tbody>
<tr>
<td>Units 20(A) and Remainder of Unit 20(B)</td>
<td>Sept. 1 – <strong>June 30</strong> [MAY 31] Sept. 1</td>
</tr>
<tr>
<td>– June 30 [MAY 31]</td>
<td></td>
</tr>
<tr>
<td>1 bear every regulatory year</td>
<td></td>
</tr>
</tbody>
</table>

Comments:

We support Proposal 138 to lengthening hunting season for brown bear in Unit 20A and 20B from September 1 to June 30 for Residents and Nonresidents.

This proposal if passed will align bear baiting season April 15 to June 30. Black bear baiting is open until June 30, but brown bear baiting is not open, this would allow hunters to bait brown or black bears.
Proposal 141 – 5 AAC.92.510. Areas closed to hunting; and 92.550. Areas closed to trapping. By Denali National Park and Preserve. Close a portion of Unit 20C to the taking of wolf as follows:

Within Game Management Unit 20C; those portions of UCU 0607 and 0605 west of George Parks Highway and bounded by Denali National Park on three sides, is closed to the taking of wolves by hunting from February 1 to July 31 and by trapping from February 1 to October 31.

Comments:

We oppose Proposal 141 to close “those portions of UCS 0607 and 0605 west of George Parks Highway and bounded by Denali National Park on three sides”, is closed to the taking of wolves by hunting from February 1 to July 31 and by trapping from February 1 to October 31.

We oppose adding additional acreage to the existing closed areas to the hunting and trapping of wolves. Closure of wolf hunting and trapping will not increase wolf population. Wolf will go where food source is, and possibly leave the area. Wolves in these areas may have left the area to follow good food source.

ANILCA states that subsistence is a priority, trappers who shoot or trap wolves do so for their livelihood, they exchange furs for cash. Trappers and hunters should not be penalized because NPS cannot do good management on its’ federal public lands.

There are a lot of wolves within other national park lands, Wrangell St. Elias National Park has wolves that could be transported to Denali National Park. National Park has transported wolves to Yellowstone National Park and wolves have thrived there. This would be a better solution then to close hunting and trapping of wolves to subsistence users.

Proposal 142 - 5 AAC.92.510. Areas closed to hunting; and 92.550. Areas closed to trapping. By Denali Citizens Council and Alaska Wildlife Alliance. Close a portion of Unit 20 near Denali National Park to the taking of wolves as follows:

We are asking the Board of Game (board) to establish a no-wolf-take zone in small portion of Unit 20, Subunits 20A and 20C, adjacent to Denali National Park. The proposed boundaries coincide approximately with the Denali National Park wolf population area, delineated by telemetry locations.

Take of wolves is prohibited on lands (Unit 20), in the area bounded on the west by the east boundary of Denali National Park; extending east to one mile east of, and parallel to, the Anchorage-Fairbanks...
Intertie Electrical Power Line; on the south by Carlo Creek; and on the north by a line from the southeast corner of Township 11S, Range 9W (Latitude 63 degrees, 55 minutes North), due east to the George Parks Highway, then south along the Parks Highway to a line running due east from the Highway through the town of Healy, to one mile east of the Intertie Line; inclusive of all lands west of the George Parks Highway commonly referred to as the “Wolf Townships,” and/or “Stampede Trail.”

Comments:

See comments under Proposal 141.

Other Regional Proposals:

Proposal 147 – 5 AAC. 85.045(11) Hunting seasons and bag limits for moose. By Alaska Department of Fish and Game. Re-authorize the antlerless moose hunting seasons in Unit 13 as follows:

<table>
<thead>
<tr>
<th>Nonresident Units and Bag Limits</th>
<th>Open Season</th>
<th>Resident Open Season (Subsistence and General Hunts)</th>
</tr>
</thead>
<tbody>
<tr>
<td>(11) Unit 13</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 moose per regulatory year,</td>
<td></td>
<td></td>
</tr>
<tr>
<td>only as follows:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 antlerless moose by</td>
<td>Oct. 1-Oct. 31</td>
<td></td>
</tr>
<tr>
<td>No Open Season</td>
<td>Mar. 1-March 31</td>
<td></td>
</tr>
<tr>
<td>drawing permit only; up to 200</td>
<td>(General Hunt only)</td>
<td></td>
</tr>
<tr>
<td>permits may be issued; a person</td>
<td></td>
<td></td>
</tr>
<tr>
<td>may not take a calf or a cow</td>
<td></td>
<td></td>
</tr>
<tr>
<td>accompanied by a calf</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Comments:

We oppose Proposal 147. If there are too many cow moose in Unit 13, cow moose will find nutritional sources elsewhere. Based upon Ahtna traditional knowledge, cow moose will move to other areas to feed themselves. Cow moose have always sustained themselves, and will continue to do.
Killing cow moose that has a calf is not the practice of the Ahtna People. Cow moose may have a calf with it and accidentally shooting it will leave the calf an orphan, thereby potentially killing a moose calf and cow moose.

**Proposal 153** – 5 AAC.92.015. Brown bear tag fee exemption. By Alaska Department of Fish and Game. Reauthorize resident brown bear tag fee exemptions in the Central/Southwest Region as follows:

**5 AAC.92.015 Brown bear tag fee exemption.**
(a) A resident tag is not required for taking a brown bear in the following units:
(1) Unit 11;
(2) Units 13 and 16(A);

**Comments:**

We support Proposal 153 to re-authorized resident brown bear tag fee exemptions in the Central/Southwest Region in Unit 11 and Unit 13. Hunters will not have to pay $25 tag fee to hunt, this will encourage more of them to harvest a brown bear.

There isn’t a conservation concern for brown bear in Unit 11 and Unit 13. Harvesting more brown bears will protect calves of moose and caribou in these two game management units.
Prop 105: I want to note that the reduction in the present herd size during hunting season the past few years is due more to a change in migratory habits and herd construction than die off. In the past few years by July 1st, tens of to hundreds of thousands of 3 herds combine and travel through the Refuge where by July 4-7 they split and over half decide to reside in the Yukon territories. The rest exhibit the signs of change of migration and path location of same. The North Slope and unit 26 B/C in particular have seen major wind pattern changes affecting feed growth for the animals in my opinion, but every 7-10 years the Bear will change migration routes, and ebb and flow into other herds. I disagreed with the upswing from 2 to 5 seeing it as an opportunity for over-hunting but also over-feeding the predator population. THAT being said, as the unit 26B only resident, I agree with the down swing to 2 bulls for the non resident hunters, and would also like to see the resident hunters brought back to 2 or 3 any caribou. Moose are not an option and never should be to me in units 26B or C. Poss highly restricted in A. So a 3 per resident may take the pressure off for food supply residentially. The Herd numbers did not decrease due to predation or die off. They are just reassigning themselves and history teaches us they will most likely be back. The Cow season is a good idea to extend giving the calves more time with Moms.

Prop 107: I agree with this proposal and it is about time! I am THE ONLY resident in the 26B unit and the late start to the Bear season forces all the bears to run from the chaos towards 26B and then the hunters dwindle to almost nothing, but the bears are here in great numbers. This has added late predation of the CAH and could even be additionally and laterally responsible to a degree for the migration changes being sooner than typical. The 15 day delay serves no purpose for health of the animals in this unit, and over hunting by road can and is already dealt with by the 5 mile corridor rules. Extend that area potentially if need be. (create a new unit Dalton unit.)

prop 109: I am actually against this one which will be an unpopular vote for my area, but to remove the restriction will once again allow the harassment by unsavory pilots/organizations against the hunters. The danger presented by the vigilante straffing was real and daily. There is no way to decipher intent by a visual on a plane, so we must err on the side of caution. Sheep need not to be straffed and sent running off cliffs or injured, and people hunting other species should not disturbed. Sheeo hunters are already a hardy breed, so suck it up and continue to restrict the air-stalking. I do believe that sheep surveying CAN be done before the season opens, plan ahead.

prop 111: I believe neck snaring to be unnc cruell and indiscriminate. With such a broad scope to the season already, do we really need to add neck snares? Moose, and other unintended species will may be caught. This method is too open to incorrect application/ installation and leaves a large, disproportionate margin for injury and dislodging of snare leaving injured animals/top predators in its wake in zones with potential human interaction esp. with young adults/children.

Prop 113: I do not feel that the sheep need to be restricted to Rams only and think that if anything no more than 1-2 ewes should be taken but a mix nonetheless.

Prop 115: I absolutely disagree with this one. Absolutely do not agree with the extension of the wolverine season here in unit 26. The Wolverine is an apex predator yes, but is a furbearer in great demand in this state. To lengthen the season this way serves only to allow the hundreds/thousand hunters during that extension time to over hunt this species. Whether or not a comprehensive study of Wolverines has been done, to add such pressure during a time when the females especially need to raise kits/ be healthy only will serve to damage the progenetics. Yes this region has perhaps a larger population, but you are opening a door to severe species debilitation during a time frame when the fur is not prime, most people do not take meat, but progenesis would be acutely damaged. I dont think The State of Alaska needs to extend a season when the only gain for hunters is neither usage of fur or meat, but trophy only. Just say no. Charging and random aggressive behaviour is already covered by DLP. This would be a trophy law, nothing more. No.
To: Alaska Dept. of Fish and Game – Board Support Section  
FAX: 907-465-6094  
ATTN: Board of Game Comments  
From: John Frost – Legislative VP of The Alaskan Bowhunters  
Date: January 26, 2017  
Reference: Comments for Interior/Northeast Arctic Region meeting – Fairbanks, AK Feb. 17-25, 2017

The Alaskan Bowhunters Association  
Comments to Board of Game  
Interior/NE Arctic Region  
January 26, 2017

The Alaskan Bowhunters Association is a membership 501 C-3 nonprofit association representing conventional bowhunters. Both resident and non-resident hunters who hunt in Alaska with archery gear are members of our organization. We thank the Board of Game for the opportunity to comment on some of the proposals before you at this meeting.

Proposal #48: 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.
(Alaskan Bowhunters page 2)

Our comments regarding this proposal are exactly the same as for Proposal #20 at your Bethel meeting. We note that you chose to Fail that proposal.

**Proposal #66:** To establish a conventional archery season for dall sheep in the Interior/Northeast Arctic Interior Region August 1-9 in all sheep areas currently open for general harvest ticket hunts.

The ABA **Supports** this Proposal. Nearly all states in the lower 48 allow generous early archery season as a means of providing plenty of hunting opportunity to a large number of individuals with relatively minimal harvest. At a time when there is general dissatisfaction with dall sheep hunting opportunities and complaints of too much crowding this proposal would provide increased opportunity to hunt sheep with reduced harvest of the resource. There is data from over twenty five years experience with the archery harvest of dall sheep in unit 14C that shows very low harvest even when “any sheep” is legal. This proposal does not request “any sheep” or even “any ram” but asks only for the chance to harvest an otherwise mature legal ram during a season free from firearms competition. To the extent that many, if not most bowhunters would choose to hunt in this early season it would reduce crowding on the 10th of August when the normal general season opens. Please notice that this proposal is not allocative between resident and non-resident hunters and would give guided nonresident bowhunters an opportunity to hunt and would give guides an additional hunt to book. This would increase revenue to the State of Alaska and to the guiding industry.

**Proposal #69:** Lengthen current archery only moose seasons in unit 20 and/or create a unit 20 late archery season.

The ABA **Supports** this proposal. It provides extra hunting opportunity with expected minimal additional harvest. The reason for requesting a moose hunt after the regular firearms general season is for better meat care with colder weather. Also an early moose hunt before the firearms season would be more difficult because the moose are not moving and vegetation makes them more difficult to find.
Proposal # 71: To allow hunters over age 60 to use a crossbow to hunt in archery only areas.
The ABA OPPOSES this proposal. There are already regulations that allow a truly disabled hunter to use a crossbow in archery seasons. There is no reason to allow strong healthy older individuals use of a crossbow simply because of their age. Many archers in their 70s can still shoot a 50 pound draw conventional bow, which is the minimum legal for harvesting moose. We view this proposal as one more step to have crossbows considered “archery gear”. This type of thing has occurred in many states in the lower 48 and it has not been a good thing. Recent experience, in Michigan and Wisconsin, has shown that introduction of crossbows in the archery seasons has significantly increased game harvests and begun to interfere with firearms harvest. Inclusion of crossbows in archery season has not resulted in increased license sales. The purpose of special archery seasons is a management tool to allow increased hunter participation and opportunity but with relatively minimal harvest.

Proposal #105: In 26B to close caribou season for cows until August 1 and to reduce the Non-resident limit to two caribou.
The ABA SUPPORTS this proposal. The DHCMA, which is bowhunting only, is very important to us. We believe that declining caribou herds elsewhere in the state will result in increased numbers of hunters for this caribou herd. With potential for decline in this herd we see no reason to allow non-residents to harvest five caribou. Also harvest of cows with young calves in July does not make good sense.

Proposal #106: Open a resident archery season for Grizzly Bear in the DHCMA starting August 10th.
The ABA SUPPORTS this proposal. There are increased numbers of grizzly bear and decreasing numbers of moose and caribou. This could be either an earlier separate registration hunt or could simply be a lengthening of the season for the current resident fall registration hunt (RB988). Again increased opportunity for bear hunting but probably small impact on total number of bear actually harvested.
Proposal #107: Lengthen the grizzly bear season in unit 26B and change the current non-resident drawing hunt to a registration hunt. The ABA SUPPORTS this proposal as it does essentially the same thing and for the same reasons as proposal #106. Either one of these proposals would affect the DHCMA.

Respectfully Submitted,
John Frost - 907-360-1301
Legislative Vice President of the Alaskan Bowhunters Association.
PO Box 220047
Anchorage, Alaska 99522-0047
907-929-3600
Proposal 113 - Adopt. (Meaning that would be the preferred action by the board)

If for no other reason than to honor the North American Model for Wildlife Conservation. After a range wide decline in the Dall sheep populations after 2013 every ewe left alive was critical to the recovery of the herds across the Brooks Range. Lamb observations are increasing in the Central and Eastern Brooks. More breeding ewes means the quicker the recovery of the population. The department's comments that there are so few ewes harvested to matter is inconsistent with conservation practices. AK State Constitution Article VIII, Section 4, Sustained-Yield. And as far as the department's point that since "local residents would still be hunting ewes on federal lands" the state regulation wouldn't make any difference in the number of ewes harvested is a sad commentary. The state successfully lead with conservation measures for the Western Brooks Range sheep populations in GMU 26, the Feds followed. The state is still expected to manage public game resources even if the federal land managers are following policy saying they do. Every breeding ewe will help speed the populations recovery to recorded numbers.

Proposal 47 - Oppose adoption.

AOC does not consider the current state definition of edible meat 5 AAC 92.990(26) for game birds leads to wanton waste.

Proposal 49 - Support adoption.

The legislatures intent to allow resident Alaskans to accompany nonresident relatives hunters on hunts for guide required species of big game, AS 16.05.407(a)(2). There is no biological reason for the board to infringe on resident Alaskan hunters opportunity to participate in regulated hunts while accompanying a relative nonresident licensed hunter.

Proposal 55 - Amend and adopt.

Amend 5 AAC 92.010 to require resident moose hunters to signify whether they are hunting under subsistence or general hunt regulations on all moose populations in Region III with C&T findings, 5 AAC 99.025. Due to the state's financial constraints ADF&G is unable to accurately determine the ANS for any moose populations in Region III that has a C&T finding. 5 AAC 99.025(b) without knowing the subsistence use.

Proposal 80 - Adopt.

The board adopted boat horsepower restriction as an allocation measure to discourage down river residents from harvesting moose in GMU19A. Restricting one user groups access is inconsistent with the Common Use clause, AK State Constitution Article VIII, Section 3. Permitting moose hunters for biological concerns to prevent over harvest is more consistent with state statutes than restricting one user group.

Proposal 83 - Adopt.

When harvestable surplus is under utilized AOC supports increasing hunter opportunity.

Proposal 89 - Adopt.

As active game management has increased the harvestable surplus of moose in the Copper Basin AOC supports increasing harvest opportunity for all Alaskans. This proposal is timely in that it's a relatively restricted area to gather data on how best to come out of a highly restrictive antler configuration for harvest to one more liberal. Some feel the spike/fork, 50" plus, 4 or more brow tines regulation skewed the genetic makeup of the moose population. GMU12 has a long record already established regarding antler restricted moose seasons. Allowing for a less restrictive antler configurations to increase harvest on young bulls in a stable moose population would increase hunter opportunity. Plus the department would be able to collect more data on the biological affects of regulated trophy hunting on a population.

Proposal 90 - Do not adopt.

Repeal 5 AAC 92.074(d) it has not served anyone's purpose. The Gulkana, Cantwell, Chistochina, Gakona, Mentasta, Tazlina, Chitina, and Kluti Kaah Community subsistence harvest adopted by the board in 2009 gave Ahtna people unachievable expectations. Based on the boards findings, #2006-170-BOG and #2011-184-BOG it was not unreasonable for Ahtna people to assume they were the sole recipients of caribou and moose permits for their CSH. The community process that has evolved in 5 AAC 92.074(d) is clearly not what the legislature had in mind when they adopted the language in AS 16.05.330(c).

Proposal 93 - Do not adopt.

No amount of capitulating to federal land managers is going to help. The State of Alaska gives up old motorized trail access far to easily. Just put up a sign warning hunters.
Proposal 101. Do not adopt.
AOC policy 2-83 does not support any preference to publicly owned moose based on residency, culture or ethnic background.

Proposal 103. Adopt.
It's time to manage both herds separately and gather accurate harvest data from both herds.

Proposal 117. Adopt.
AOC is supportive of brown bear baiting as a regulatory tool used in activity managing game.

Proposal 142. Do not adopt.
AOC is not supportive of reallocating game on state lands currently open to hunting/trapping to just viewing.
Dear Alaska Board of Game Members,

Please find the following comments regarding proposals you will be considering during your February meeting in Fairbanks. The Alaska Professional Hunters Association Inc. (APHA) is opposed to attempts to change non-resident allocation formulas established in Board Policy (2007-173-BOG). APHA members rely on fair and predictable allocation to non-resident hunters based on defensible biological parameters that are 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 allocation 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 III. 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 III. 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 49 & 50 - Support

After working with the Department, APHA supports Prop. 49 and Prop. 50 as a statewide action. APHA wrote the proposal that resulted in the bag limit restriction on second degree of kindred relatives (2DK) but that proposal was significantly different than the board-amended version that actually passed. APHA would like to see the slate wiped clean so that any future regulations to address problems or abuses with 2DK use or allocation are fair and solve the actual problem identified.
Proposal 51 - Oppose

Proposal #51 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 III.

Proposal #51 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 if its intent was to close non-resident participation during an IM program. Nowhere in Alaska statute does the legislature give any such direction. Non-resident participation and an active IM program are not mutually exclusive.

Proposal 51 should fail because it misconstrues the plain statutory language in AS 16.05.255 by suggesting there is a need to enshrine another layer of 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 51 could have the unfortunate and unintended effect of lowering population thresholds 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 exceed it in future prey survival. 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 toolbox at a time when we are trying to give ADFG more options, not less.
Proposal 52- Oppose

APHA strongly opposes Prop. 52 due to its lack of a conservation basis for the requested allocation restrictions. Prop. 52 further fails to discuss important issues surrounding the Board of Game’s statutory mandates which it must consider when making preferences between beneficial users. Non-resident hunting licenses and tags are the main source of revenue for the Department of Wildlife. Proposal 52, as written, would cause an undue cost to the public and the department, by depriving ALL Alaskans of necessary funds to manage wildlife for their use and enjoyment. Alaska is in the middle of a difficult time economically. Prop. 52 would diminish necessary conservation funding to state coffers while gravely disadvantaging small hunting guide businesses. Passage of Prop. 52 would result in less public and private sector jobs.

Proposals 57-61- OPPOSE

APHA maintains strong opposition to efforts to re-allocate sheep hunting opportunity without a clear conservation objective. There are 6 such proposals that will be addressed in the Region IV Fairbanks 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 were 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 mone 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. An consensus driven process relies on gathering a group of individuals with a willingness to compromise, and who have good will towards each other with some basic social skills and open minds that consider other’s interests as well as one’s own selfish goals. APHA entered into this group with the intention of considering an 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 manage 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 absolute at odds with a bright future. APHA suggests that if mone is to be spent on future SWG meetings, the board should 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 Department’s updated “Sheep Management Plan.” APHA feels strongly that significant changes to sheep hunting opportunity should have a conservation basis.

Proposal 62- OPPOSE

APHA strongly opposes efforts to allocate hunter success vs. hunter opportunity. APHA is a professional organization of hunting guides who are subject to our organization’s code of conduct as well as professional ethical standards. As per. 12 AAC 75.340 (f)(1) a guide is prohibited from:

“make(ing) guarantees as to the success of a hunt or the number of animals to be taken on a hunt;”
Violators of 12 AAC.340 are subject to sanctions described in AS 08.54.710. Proposal 62 would allocate hunter success and thereby create an ethical conflict for guides where one does not exist now. It is unethical for guides to make guarantees of success to clients, or potential clients. Prop. 62 would reward guides with more non-resident opportunity for lowering success rates.

Proposal 62, and other efforts to allocate hunter success, work counter to established principles of consumer protection and professional ethics. You cannot regulate success, so allocation, when necessary, should be based on opportunity. Proposal 62 should be rejected.

**Proposal 63- AMMEND**

APHA recommends addressing proposals like Prop 63 on a statewide basis.

**Proposal 65- OPPOSE**

Limiting non-residents to one ram every four years is an appropriate conservation and allocation measure in these times of depressed sheep populations. There is little disagreement that each and every legal ram is precious and valuable. It makes sense to mirror brown bear non-resident harvest restrictions during times of challenged sheep resources. Small, incremental conservation measures may add up to large savings for future Alaskan hunters.

**Proposal 67- Support**

APHA supports Prop. 67 on its given merits.

**Proposal 69- Oppose**

**Proposal 75- Support**

**Proposal 79- Support**

APHA supports this proposal based on the obvious conservation merits of intensive management in the McGrath area. We defer to, and support, the department’s comments on this proposal.

**Proposal 81- Support**

APHA supports this proposal based on the stated need to clarify 5 AAC 92.540(7)(a)(ii) and we agree with the reasoning in this proposal. Proposal 81 is a necessary clarification that will ease enforcement and reduce the potential for conflicts.
Proposal 82- Oppose

APHA opposes this proposal but agrees with the proponent that a guide concession program would benefit sheep hunters in unit 19.

In 2015 APHA realized that the guide industry needed to put its advocacy for a guide concession program on hold and focus its efforts on new revenue for the Division of Wildlife. Now that HB137 has passed and there are millions of dollars in new revenue available for wildlife conservation, APHA will fully commit its resources to support the guide concession program.

APHA opposes Prop. 82 because there is not a defined conservation goal, and drawing hunts, without guide concessions, destroy guide business viability.

Proposal 83- Defer to Central-Southwest Region Meeting

APHA agrees with the Department that Prop. 83 should be deferred to the Central-Southwest Region Board meeting in spring, 2018.

Proposal 87- Support

APHA supports this proposal because it fixes an unintended effect of the new youth sheep hunt. The Glacier Mountain Controlled Use Area should be in effect for both youth and adult sheep hunters.

Proposal 92- Support

APHA supports Prop. 92 based on its given merits.

Proposal 97- OPPOSE

Back Ground:

In 2008 the Board of Game passed Proposal 55 creating DM810 in an extremely remote portion of GMU 21B that includes portions of the Nowitna National Wildlife Refuge. DM810 was deemed necessary to address conservation concerns but the board was challenged by practical concerns of how tags would be utilized in such a remote and economically depressed region. The board applied its own allocation policy, based on average historical use, and allocated 50% of the tags to residents and 50% to non-residents. To ensure the maximum participation and benefit of the limited number of allocated tags, non-resident tags were further broken down into two categories; guided non-resident and non-guided non-resident. No less than 25% of the non-resident tags would be unguided, no more than 75% would be guided. The board applied its own policy for resident/non-resident allocation when going to a draw hunt and created a
hunted structure that maximized the benefits of the limited non-resident allocation.

Legal Concerns

The proponent of Prop 97 complains that DM 810 is an illegal hunt structure that is unconstitutional and in violation of statutory authority not explicitly granted the Board of Game. The authors argue that resident hunters are enshrined with a constitutional allocation priority (Article 8) and that the board of game has somehow illegally broadened AS 16.04.407 by allocating some non-resident drawing tags to “guided non-residents.” The authors of Prop 97 disagree with the Board of Game and the Department of Law and assert DM810 illegally provides for a "guided non-resident" moose allocation.

DM810- A Constitutionally Sound and Statutorily Defensible Hunt Structure-

Article VIII of Alaska constitution addresses “natural resources” with the following sections being germane to the discussion on Prop. 97:

Section 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 the maximum use consistent with the public interest.*

Section 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.*

Section 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.*

The Framers of Alaska’s constitution had the opportunity to enshrine a “clear resident hunter priority” in the constitution; they did not do so. The Framers did make it clear that they wanted Alaska’s resources developed for “the maximum benefit of its people.” Article VIII, section 4, empowers the legislature as the body that will make game allocations or “preference(s) among beneficial uses.” Recognizing the strength of a decentralized power structure, the legislature delegated most of its wildlife allocation authority when it constituted the joint boards of fish and game. Proponents of Prop 97 falsely assert the existence of a “clear resident hunting priority” in Alaska’s constitution; the board of game has broad authority to make allocations for “the maximum benefit of its people(s).”

Geographic, Economic and Social Concerns

GMU 21B is an extremely remote and sparsely populated region of Alaska. Most of 21B is Federal land that is closed to mineral entry and timber harvest. Federal land management policy further disadvantages Alaskans where building of new cabins or structures is, for all practical purposes, impossible. Fish, wildlife and fur animals are the primary resources local are residents rely on for food security and a limited cash economy. Guiding hunters may be the most important economic opportunity in the area and other rural areas similar to GMU
21B (McDowell, 2013). Economic opportunities provided by game allocations to hunting guides sustains critical employment; meat sharing (McDowell, 2017); and transportation and logistical support to locals for remote tralines, fish counting stations (ADF&G), subsistence fish wheels and subsistence farming. The portion of GMU 21B that includes DM810 realizes all of these social and economic benefits of the guide industry.

Traplines, Wolves and Resident Hunting Opportunity

Much of GMU 21B is federal land managed by USFWS and therefore off limits to state intensive management. Predator harvest that offsets human harvest of ungulates is almost solely attributed to the region’s trappers. Some wolf and bear harvest does occur annually from subsistence users, resident hunters and non-residents hunting with the local guide. DM810’s region includes a number of active traplines that benefit from having a local hunting guide help with transportation of goods and necessary supplies, the number one expense for the local trappers. The sustained wolf harvest from these local traplines, a known benefit to resource management, is therefore an indirect benefit of guided non-resident hunters. Guided non-resident moose hunting opportunity is a critical link in the chain that bonds Alaskan hunters to a healthy and wild Nowitna River.

Resident hunters and the harvestable surplus of moose they rely on for their allocation are currently benefitting from local trapping and guided non-resident bear and wolf harvest. Passage of Prop 97 would destabilize the relationships between necessary logistic support of local trapping, guided predator harvest, and the moose resource. Trapping and guiding hunters are currently working to “encourage the settlement of its (Alaska’s) land and the development of its resources by making them available for the maximum use.” Total or gross numbers of resident hunters should not be the sole consideration while seeking “the maximum benefit of its people(s).”

Guides are Alaska Residents

Alaska’s active registered guides are overwhelmingly Alaskan residents. According to the 2012 McDowell study, 89% of the active contracting guides in Alaska are residents. That means virtually all of the new dollars and other associated economic benefits (employment, spending etc.) from guiding hunters in Alaska stays in Alaska. Alaska’s near total capture of the benefits brought by guided hunting is magnified in rural areas. Fully 50% of the economic benefits of guiding hunters stay in rural Alaska (McDowell, 2012). It is easy to argue against “non-resident hunters” but we should be arguing FOR resident Alaskan hunting guides who bring a necessary economy to depressed rural areas. The current hunt structure in DM 810 is a manifestation of the legislature’s constitutional command to: “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.”

A strong case can be made that the residency of the guide should determine whether or not the allocation is “resident” or “non-resident.”

Mixed Cash Subsistence Economy- Shared Meat

In 2015 hunting guides and their non-resident clients shared 230,000 lbs. of game meat in Alaska (McDowell, 2017). Meat shared by guides was conservatively valued at a 1.1 million dollars replacement (beef) cost. Sharing meat is particularly important in the aforementioned economically depressed areas in rural Alaska.

GMU 21B is entirely rural with 100% of its residents qualifying both as State and Federal subsistence users. Moose are the most important terrestrial source of protein to the area’s residents. DM 810 encompasses an exclusive federal guide concession. This concessionaire is a local resident, who hires other experienced local residents as assistant guides. Guiding hunters does not disqualify a person from qualifying for state or federal subsistence hunting opportunities. Shared guided non-resident moose meat directly replaces moose that would have to be allocated and harvested under state or federal subsistence seasons if there was a loss of guided-moose hunting allocation. Guided non-resident moose harvest is critical to the mixed cash, subsistence economy in 21B.

Conclusion
DM 810 is a statutorily defensible and constitutionally sound hunt structure. DM810 is evidence that the Board of Game works to evaluate the complex social and economic relationships that surround wildlife use in rural Alaska. DM 810 provides excellent opportunity to hunt an extremely remote moose population in a way that allows locals to work for the greatest interests of all Alaskans. Clearly resident hunters support sound wildlife management, to include sustainable predator harvest. Local trappers catch wolves in the unit and they are partly reliant of the benefits brought by the local guide. Locals employed as guides do not need to hunt under subsistence seasons to fill their freezers with valuable moose meat. Urban resident hunters can now travel to a remote and wild region that has a more abundant moose population than it would have without the benefits brought by guided moose hunters. Resident hunters enjoy other benefits to the current situation as well. Having a local guide and local residents living in the region provides a safety net in these times of reduced public safety budgets. Guides don’t just share meat, employ people and bring new money to Alaska, they also help resident hunters in need and act as stewards of the country.

Passage of Prop 97 would unnecessarily upset and impoverish a remote portion of Alaska that is currently self-sufficient. Only a very few urban resident hunters would benefit until the moose population declines and the number of tags available diminishes. Transporters would also benefit from removing the “guided non-resident moose hunter” requirement. Unit 21B is remote, and its residents rely on subsistence use of fish and game. Non-guided non-residents are much more likely to waste meat, and less likely to share with locals, than are guided non-residents. Proposal 97 should fail because of the many enumerated and defensible benefits for all Alaskans (Alaskan resident hunters, Alaskan guides, Alaskan residents of the area and Alaskans that can no longer hunt) under the current regulations; whereas the proposed solution only benefits non-residents who don’t want to hire a guide, transporters and urban resident hunters who must draw.

**Recommendation**

*APHA suggests that some non-resident moose, deer, caribou and elk drawing permits that do not have a “guided non-resident” allocation are working counter to statutory and constitutional mandates to derive the “maximum benefit” of Alaskan’s precious game resource to “its people.”*

APHA recommends the Board of Game request a full staff analysis (Division of Wildlife, Division of Subsistence, Department of Commerce and Federal Office of Subsistence Management) of the social, economic and conservation issues relevant to all the drawing hunt structures requiring a “guided non-resident moose” allocation. Given the new information contained in APHA and SCF's 2017 McDowell report, DM810 is a template that could be applied in all non-resident drawing moose hunts in Alaska.

**Proposal 98- Support**

APHA supports proposal 98 based on its given merits.

**Proposal 99- Amend and Adopt**

APHA recommends Prop 99 be amended to a July 25th season start date, and retain the existing end dates.

**Proposal 105- Support**

APHA supports Prop 105 based on its stated conservation goals. We understand that the Central Arctic Caribou Herd has declined close to minimum management objectives. It makes sense to lower caribou harvest at this time. Prop 105 proposes a fair restriction with reasonable allocations between resident and non-resident hunters.
Proposal 107- Support

APHA disagrees with the department; Prop 107 will not cause a bear conservation concern in GMU 26B. Managing non-resident bear hunts by registration hunt allows for an appropriate balance between increased opportunity and conservative harvest.

The proponent of Prop 107 states that he has hunted in the area for 37 years. We are confident that he will suggest more restrictive harvest seasons, numbers or hunt structures if the bear population diminishes to a point of concern.

Proposal 109- Support

APHA strongly supports Prop 109 based on its given merits.

Proposal 110, 111- Support

APHA appreciates the Yukon Flats Fish and Game Advisory Committee’s goal of increasing black bear and wolf hunting opportunity based on the super abundance of black bears in the area. Black bears are an excellent animal to hunt for food and black bear hunting is a great way to get out in the field and enjoy the outdoors. We understand the locals have been snaring bears going back many, many generations and support legalizing a practice that is customary and traditional.

Proposal 113- Support

APHA supports Prop 113 based on its stated conservation goals. Sheep in region IV are at historic low numbers. Harvest of ewes at this time is inappropriate.

Proposal 117-121 Support

Proposal 124- Support

APHA agrees with the proponent that Prop 124 would ensure that hunt allocations set aside for wounded veterans are fully utilized.

Proposals 127, 128 and 129- Oppose

APHA agrees with the Fairbanks AC’s comments in opposition of these three proposals.
Proposal 132- Support

APHA supports increasing non-resident moose seasons in GMU 20B because. Prop 132 offers a modest lengthening of the season that is unlikely to cause a conservation concern.

Proposal 136- Support

Re-evaluating intensive management goals periodically is a good idea. If the Delta caribou herd is not attaining its population objective, evaluation and assessment of the management parameters is justified.

Proposal 140- Support

APHA supports Prop 140 based on its given merits.

Proposal 142- OPPOSE Buffer Zones

APHA opposes efforts to re-create a Denali wolf buffer zone. Such efforts are divisive and not biologically justified. Wolf viewing opportunities are much greater on the adjacent state managed land. It does not make sense to apply Park Service management, that has resulted in a small wolf population and minimal viewing opportunity, to an area where wolves are better managed and more abundant.
Dear Chairman & Members of the Board:

The ATA appreciates the opportunity to offer the following comments on proposals you will be considering at your February 2017 Interior/Northeast Arctic meeting in Fairbanks.

Proposal 72 - We support this proposal within the parameters of existing predator control regulations.

Proposal 73 - We have no problem with another user group harvesting coyotes but, with all due respect to the Delta Junction Fish and Game Advisory Committee, we suggest that any coyote hunting with dogs not overlap the trapping season. We suspect that access limitations would make dog recovery problematic in most of Unit 20 but, more importantly, we are fearful of the conflict between loose dogs and traps.

Proposal 84 - With all due respect to the Upper Tanana Fortymile Fish and Game Advisory Committee, we oppose the extension of wolf trapping season for the purpose of aligning with the federal subsistence season. Since fish and game management is the responsibility of the state, it would make more sense that the federal season be modified to comply with the state season. Also, incidental catch would present a problem.

Proposal 98 - We have been told that this is being handled administratively, and trust the Board, and ADF&G staff, to take the appropriate action.

Proposal 99 - We oppose the extension of wolf hunting season into the summer. We suspect that 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 expense of residents.

Proposal 112 - We support the proposal within the parameters of existing predator control regulations.
Proposal 114 - We oppose the extension of 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 the hunting seasons for furbearers should closely reflect the calendar limits of trapping regulations.

Proposal 115 - We oppose the proposal as written but support the alternate solution of ending the lynx trapping season on March 15 in order to standardize the lynx season for all of Unit 25.

Proposal 135 - We have no objection to the proposal as it would standardize the wolverine trapping season in the remote western portion of Unit 20C with the wolverine trapping season in adjacent Unit 19.

Proposal 141 - We oppose this proposal. It appears to be an incremental step toward the buffer that has been proposed before around the east end of the expanded, six million acre Denali National Park.

Proposal 142 - As we have done consistently in the past, we oppose this proposal. It is an overreach of the “no more” intent of ANILCA. Alaskans lost a lot of hunting and trapping opportunity to ANILCA. Closing these areas of state management to hunting and trapping, and/or shortening seasons, is biologically unnecessary since wolf populations are dynamic and healthy, and because the current harvest is minimal. The Park already encompasses six million acres that is closed to hunting and trapping. Wolves come out of the Park because the resources in the Park don’t support them. Management within the Park should be adjusted to remedy that before any attempt is made to spread park management beyond the boundaries of the Park. We object to this consistent effort by people opposed to consumptive use of wildlife to force their version of “compromise” onto consumptive users. If they seek real compromise, then they must offer something of value in return. If the State is somehow forced to resurrect the Denali wolf buffer zone, then we recommend the State demand that all residents be allowed to hunt Dall sheep in Gates of the Arctic and Wrangell-St Elias parks.

Thank you for this opportunity to comment on these proposed regulations.

Sincerely,

[Signature]

Randall L Zarnke, president
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
Mr. Chairman and members of the BOG.

I respectfully submit my personal comments for your review.

Proposal 47 DNS. This proposal asks to change the definition of what is edible meat from game birds. It would seem to me, if this was to be changed. Persons would not be able to use those parts that some don't like to use for human consumption, but do like to use for bait. I do not believe there is a wanton waste of game birds currently. I think current salvage requirements are acceptable with current consumptive wildlife users.

Proposal 48 DNS. I would not support, because adding another weapon would add more hunters. If we keep adding weapons that can be used in restricted weapons areas, I think it would be easy to rewrite the regulations to weapons not allowed. As the author also used a point of merit, that younger or older hunter would or could benefit, but it is not exclusive to those groups. Restricted weapon hunts are just as it is indicated “restricted”. Restricted in the literal sense does not allow for everyone or weapon. But the board is getting closer each cycle, adding weapons to be allowed in restricted weapons hunts. It may be time to make the regulation to cite which weapons are not allowed, this would be a shorter regulation.

Proposal 49, 50 Support. I believe this was not the intent of the statue nor should it be. I also think the legislature discuss this while the bill was going through hearings. To give those residents who would like to share and be with family members who are not residents and opportunity to hunt together for a species of big game in this state which is only affordable in most cases to the upper middle class and wealthy. I would hope it is not the intent of the BOG to penalize Alaskan residents for partaking in this exemption in statue, when there is not a stock of concern for that species in that area or region.

Proposal 64 DNS. The issue with this proposal is “sub legal ram”. If it is not allowed to be harvested, it cannot be taken. Nannies are legal to take.

Proposal 66, DNS. I do recognize that a special archery season would have a low impact on the harvest, and would provide more opportunity. But what do we do when the muzzle loader users want the same exceptions, what about those who use pistols, what about those over the age of 62? You the BOG have a youth hunt season that starts before the “no use of aircraft” regulation, if this passed it would also be outside the use of no aircraft regulation. It also raises the question why do have a regulation restricting some with uses of aircraft and not others? Lastly, the Haul Road provides and archery only area in the
interior. The last two times the legislature tried to amend the Haul Road corridor statue, the archery community tenaciously at such amendments.

**Proposal 69, 70, 71 DNS.** Every special group by age, method, domicile or disability wants a special season, longer season, or less limits.

**Proposal 73 Support as amended.** I don’t want the use of dogs to hunt coyotes when there is a trapping season. For all the obvious reason. But this proposal has merit outside the trapping season.

**Proposal 77 support** raising the brown bear bag limit to two. I do not notice a proposal to sell brown bear hides or skull. But is only mention in the issue section of the proposal. But it is interesting that Brown Bear in unit 21 E have a positive finding of C&T, yet the regulation on bartering big game with a positive C&T only applies to the meat of big game. This would be a good to address. Why only the meat of big game, and the horns/antlers, (if separated from skull) and not the hide/skull of a subsistence taken Brown Bear? 5 AAC 92.200 (b)(1)

**Proposal 82 DNS.** It would seem from my research resident just choose not to hunt in this area for several reasons. Mostly issues around access/logistics. I do not believe more residents will choose to participate, because there is fewer nonresidents having an opportunity.

**Proposal 84 support.** But it is noteworthy to point out, that recent federal action on taking of bears, wolves and caribou, that the federal wolf season starts early than the State’s.

**Proposal 86 DNS.** Moving the boundary only moves the issue. You are currently not allowed to shoot on, over, or across a highway or road. Making a corridor, essentially just makes a wider highway or road. The issue will still remain. Some will still shoot on, into, or across the corridor if enacted. Also enforcement issues will remain the same.

**Proposal 90 DNS.** Consumptive users are still allowed to hunt this area. Regulations do not restrict an opportunity if you are not part of a CSH. Why make an area that is less crowded, into a crowed area? One of the main principles of the CSH is to share. I remember hearing and learning a lot about sharing harvested moose and caribou. How it helped the elders and those with disabilities, and those that could not participate. Instead of making a larger area. Why not educate users about the “proxy hunting”. The legislature recognize that not everyone can participate in the subsistence or general hunting opportunities afforded to them, so they enacted AS 16.05.405. This law fits well with the intent of the proposer and a main criteria of community hunting. (Harvest for elders, persons with disabilities, and sharing) Everyone should respectfully share their successful harvest. It does not take CSH or area to teach or practice this. As the proposer suggests it is less crowded and will be adventurous to keep it this way and you can still practice traditional subsistence.

**Proposal 100 DNS.** This proposal really has nothing to do about WACH decline, or any other caribou herd in decline. I know of no research that attributes aircraft sounds to declining caribou population.

**Proposal 101 DNS.** Unit 25D has the vast majority of all rural communities with in unit 25. 25D could also be the largest subunit of unit 25. Unit 25D also has been in a Tier II status for decades for moose. Biologically it would be ill advised to take cow moose. I would still advise, not even taking bull moose for any of the community events listed but are not limit to as stated by the proposers. Because there is no harvestable surplus for anything but the most qualified subsistence user, TIER II. Furthermore I think this
would be a great time to review some of the 8 criteria for subsistence uses found in: 5 AAC 99.010(5) “persevering, and storing” so wild resources can be use in for future uses. (6) “values” which includes the value of sharing of a successful harvest and preparing for future uses, gatherings and unforeseen events. (7) “distributed, or shared, and gift giving” all are good criteria of subsistence and should be practiced at locally gatherings or whenever possible. (8) “wide diversity of fish and game resources” Moose may be preferred, but subsistence people need to use all sources of subsistence foods for (8) “cultural, and social” gathering or events. Most game in unit 25 have positive findings of C&T.(except for two areas for sheep and brown bear) I believe if you review why there is a positive C&T on game in unit 25 via 5 AAC 99.010 (1-8) the eight criteria, you may understand why it is not necessary to have a special permit for taking moose out of season, when subsistence patterns and uses already exists. The same proposers are asking for a different finding of C&T for brown bear in 25D. (Proposal 108) I would great if they can show they have used some of this brown bear meat harvest at such events listed in the proposal.

Proposal 103 support. This is not a new proposal. When members of the public, or AC’s have summited the same concept, past Boards voted them all down. The Department believes this would be a good tool. So why haven’t they been using it? They already have the authority per AS 16.05.370 Reports by licensees. (a) The commissioner may require a report to be made by each licensee concerning the time, manner, and place of taking fish and game, the kinds and quantity taken, and other information helpful in administering the fish and game resources of the state.

I would also review AS 16.05.330 Licenses, tags, and subsistence permits.

(a) Except as otherwise permitted in this chapter, without having the appropriate license or tag in actual possession, a person may not engage in (1) sport fishing, including the taking of razor clams;

(2) hunting, trapping, or fur dealing;

(3) the farming of fish, fur, or game;

(4) taxidermy; or

(5) control of nuisance wild birds and nuisance wild small mammals for compensation.

I do not see anywhere in the statue chapter “except as otherwise permitted” that the BOG could exempt persons residing north of the Yukon River not to have been require to have harvest tickets/reports.

Proposal 108 Support. It always good to review. But not because a game population has increased, or a bag limit may or has changed. But to check 5AAC 99.010(b) Each board will identify fish stocks or game populations, or portions of stocks or populations, that are customarily and traditionally taken or used by Alaska residents for subsistence uses by considering the following criteria: So has something changed since the last finding of negative C&T? Bag limits are not part of the 8 criteria.

Proposal 114 Support as amended. I would ask the closing date [MARCH 31], for hunting to be amended to Last day of February. I do not support starting the season early. As stated in the board meeting in Bethel last month by board members, that an earlier season for the take of wolverine could impact females that are whining their kits into July. This justified not passing the proposal. Why I would want the season to close earlier (Last day of February) is because this is the time pregnant females are going into denning or are already have kits in dens. If you kill one of these females it is 100% mortality on the
whole family after February. I would gather the conservation of the resource is just as important at the start of the season, as should it be at the end of the season.

**Proposal 124.** This should have already be accomplished per Statues AS 16.05. 370 Reports by licensees. (a) The commissioner may require a report to be made by each licensee concerning the time, manner, and place of taking fish and game, the kinds and quantity taken, and other information helpful in administering the fish and game resources of the state. Also As 16.05.420 License, tag, permit, and registration violations. The department has been reluctant to use their authority that has existed. What is going to change?

**Proposal 134 DNS.** Creating a new management area does not solve this issue of trespass. In fact changes nothing. Privet property is that. Trespassing laws already exist. Non owners have to get permission to trespass on privet lands already. New amendments to trespassing statute void even having the land owner to even post privat lands. It is up to the non land owner to get permission before enter privat lands. This not what a management area are intended for.

**Proposal 135 DNS.** Pregnant females are at least going into den sites in February and some may have already had kits. From a conservation of the resource I would not support lengthening the season any further than it already is. If you could I would support shortening the season to the Last day of February. At the Bethel meeting last month a couple of board members state that taking wolverine in July when females are whining pups could result in a mortality of some of those kits. Female wolverine that have kits in the den, February through March and are trapped or hunted will result in 100% mortality of those kits in the den. Incidental take is not an issue. But allowing a season for wolverine past February is.

**Proposals 141 and 142 DNS.** This request to close an area of 20C to no opportunity does not comply with Alaska subsistence law, AS 16.05.258. 20C has a healthy wolf population therefore subsistence users should not be restricted to no opportunity on their traditional trap lines on state lands, when there is no conservation concern. I believe this is pretty clear in the law. Also I believe that stating a subsistence trapper in this proposed closed area could go or move to a different part of 20C to provide opportunity. Would not be consistence with economy effort, a pattern of long use of the resource harvested in the area, and so on. It could be argued that the subsistence trappers in this area meet all of the 8 criteria found in 5 AAC 99.010. Also if the subsistence trapper had to move to a different area to be provided his opportunity, he would be competing and conflicting with subsistence users. The very first trapper’s responsibility in the “code of ethics” for trappers is 1. “Respect the other trapper’s “grounds”.- particularly brushed, maintained, traplines with a history of use.

Viewing opportunity and economical befits to the State and Denali area. If you visit the Denali National Park web site. [https://www.nps.gov/dena/learn/management/statistics.htm](https://www.nps.gov/dena/learn/management/statistics.htm) Park statistics. you will see a chart with numbers of people that visited the park from 2000 to 2016. from that chart you can see park visitations has only grown. Couple things to look at on the chart. 1. When the buffer zone was closed to the take of wolves. Park visitation only grew by about 100,000 visitors. Yet in the spring of 2010 the BOG rescinded the buffer zone and visitation grew by about 200,000 more visitors to date, or just under twice as many more visitors. Glitter Gulch the retail/hotel community just outside the park has also grown profoundly. The retail community has not been even remotely effect by the buffer area being opened. There are now stop and go lights, new foot bridges, and bike and foot paths. Capitalists have invested there money and efforts to Denali because it is profitable. If DNP supervisors and leadership had any concern of viewing opportunity for wolves. They have 6,075,030 acres (9,492 square miles) to
find an opportunity for their visitors. Thus would not have to spend time at the BOG meeting every three years trying to convince that current board why there should be a closed area on State land to subsistence users.

Lastly like a couple of other proposals I have commented on. Making a closed area just shifts the issue. Wolves (Denali wolves?) will still get harvested outside the proposed closed area. Case in point. Last spring a male wolf was freshly collared in Denali and was caught shortly after that by a subsistence trapper in the heart of Minto Flats. Wolves have territories and those territories are defined by amount of food resources they access to and size of pack to defend those territories. Not man made areas or boundaries.

Proposal 159 DNS. A better proposal or amendment should be considered. “If a hunter who is found guilty of harvesting an illegal moose, the offender shall attended a moose identification class by the department or an approved organization”.

When the BOG changed the bag limit on the bull opportunity in 2012 and 2014. Which resulted in a higher illegal take. Did this happen in other areas of the state where the BOG enacted similar restrictions? How many of the illegal taken moose was from nonresidents? Dose data show that this is something that could happen as a result of a new change in the regulation in the first few years but over time hunter educate themselves to what is legal, and thus the illegal take starts to drop? The authors suggest; “are being mistaken for 50 inch bulls by inexperienced hunters”. Is this true, and what is an inexperienced hunter? If this is happening because of inexperienced hunters why should experience hunter have to take a class? I would encourage the board not to adopt this as written. The information is already available in the “handy dandy” and the department. The spike/fork, 50” 4 brow tine regulation is not new to Alaskan game regulations.
Mr. Chairman and members of the Board of Game.

I am the author of proposals 53, 54, 55, and 56. I wish to have these proposals with drawn from the next scheduled meeting. After the discussion and action by the board at the Bethel meeting on the same issue, if feel my concerns have been addressed. Due to the time constraints for the Fairbanks meeting. With drawing these proposal will help in that endeavor. (to include staff time)

Back ground for me submitting the proposals: At the last statewide meeting I had summited a statewide definition for general season. I was told by the Ast. A.G. that I should submit the idea at regional meetings and the proposal was not a statewide issue. (She may have also stated that on record. I do not have the time to research it). So thus the proposals. Also since there are two regional meeting this cycle, the concept is at both meetings.

I was also hoping that since a road map of proposals (Fairbanks meeting) has not been produced as of the time of this letter. That these proposal would not even appear on it. I was lead to believe this was not really possible, due to 5 AAC 96.610 Procedure for developing fish and game regulations. Upon review of that regulation. I do not see a citation within that regulation, whereas the board could not remove a proposal when author wishes so.

I believe the board can with draw/ not recognize it on a road map for action, via the request of the author. The regulation does not state that this type of action by the board is not allowed. (Thus should be allowed)

But if you believe the intent of the regulation still does not allow the board to completely with draw a proposal by request of the author and you would like that tool. I would be willing to draft such a proposal at the proper notice of call to do so.

Time for board meetings/staff is very limited these days and if authors of proposals can with draw their proposals early enough, way post them/reconize them?

End closing, and due to the process and recommendation, I had to summit proposals at two scheduled meetings, dealing with the same issue regionally. The action at the Bethel meeting satisfies me and I request the board/staff not to spend any more time on the proposals I have requested to be withdrawn.

Have a great day!

P.S. feel free to contact me.

Al Barrette
Proposal 99

I drafted this proposal and I believe it may have been printed wrong, either that or I sent a rough draft, rather than the final copy. After some thought, I would like the proposal amended to start Wolf Seasons July 25 and leave the current closing dates in all areas. I have heard some dissent from trappers on these proposals due to unprime fur but the vast majority of hunters would find any wolf they take a very valuable trophy. These animals are NOT taken to sell to a fur buyer as is the case with most trappers.

Proposal 114

I drafted this proposal and would ask the board to extend the Wolverine season in at least 26c. ADF&G states that most years there are zero wolverines sealed from the subunit although there is a healthy population in this huge area. If the Board thinks July 15 is too early, I would suggest an open date of August 1 or August 5. This would allow most sheep hunters the opportunity to take an incidental wolverine. I have also heard some dissent from trappers on these proposals due to unprime fur but the vast majority of hunters would find any wolf they take a very valuable trophy. These animals are NOT taken to sell to a fur buyer as is the case with most trappers. A wolverine is a trophy most hunters will only have one opportunity to take in a lifetime. It is unfortunate that they may not take one when they have the chance in a vast area where the harvest by trappers is virtually zero.
I served on the board in the 90's while I lived in Paxson. I felt all resources were used to make educated decisions on regulations.

The cow moose slaughter on the Elliot hwy where I now live, is not acceptable for a healthy moose population. I have lived here since 2000, and the moose population has been decimated since the continued high cow kill along the Elliot hwy.

In the beginning, our numbers of moose allowed it. It was obvious by the car/truck and moose accidents. But now I believe the state is afraid of the presidents set in our eastern states, where the states lost insurance lawsuits and were responsible for auto accidents involving (state property) wildlife.

Living near Livengood, and working in Manley and Minto the last 3 years, with hundreds of miles commuting back and forth really opened my eyes to the fact that our moose are gone!

I rember receiving a letter a few years ago saying something about a fear of a moose population explosion, due to the fires that would cause to much browse and food!!!!

I say bull!

I travel miles and miles on my trap-line through good moose county and never cross a moose track! You can drive from Fairbanks to Manley and not see a moose track! This area can hold a lot more.

Drive through Delta-junction and you see moose in unnatural herds in the fields! Why! This is a very hunttable overpopulation.

Seems to me our moose are not being managed very well! It is always too much or too little. Why is common sense removed from all public operations?

I have failed myself, because I have not been involved.

This unwarranted cow slaughter needs to end if we can expect to have a healthy moose pop in this area.
Proposal #78

I fully support opening the brown/grizzly season on August 10th VS the current opening of September 1st. I believe the number of bears has been steadily growing in unit 19c and I would rather not see them get out of control as they have in other surrounding units. Not only would this proposal increase license and tag sales for the state but it would also provide more opportunity for hunters to harvest bears. I think this proposal strikes a happy medium between a slight increase in the number of bears harvested and maintaining a healthy population of bears in unit 19C. I am in support of proposal #78.

Proposal # 82:

Having spent a good portion of time in unit 19C in the past 7 years, it is my belief that this proposal is unessisary from both the biological and the hunter conflict standpoints. The fact that resident hunters have a lower success rates than guided hunters makes perfect sense - they literally have professionals working for them to ensure their success. I do not support this proposal because it's trying to address non-issues in the hunting area.
I support the Tok area AC proposal 87 to lengthen the NON-MOTORIZED season within the Glacier Control use area. It must be done, in my opinion, and strongly believe there are less than the number (2-6) legal rams that the proposal indicates, at this time!!

Jeff Burwell
Please think, every animal has a right to live. You can't keep killing and killing. Man does not own the earth and everything living on it. We don't have the right to pick and choose what lives and dies, we are not God. What is the world going to be for our children. When we kill off everything that's wild, for sport or room to grow. What then, to we pass s law when only one child is allowed per family. Animals are here for a reason on this earth, they all have a part to play in keeping everything in balance. Please don't disturb this balance, for future generations. Out Children.
CHUGACH STATE PARK CITIZENS’ ADVISORY BOARD
18620 Seward Hwy, Anchorage, AK 99516 Phone: 907-345-5014 Fax: 907-345-6982

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

Re: February 2017 Board of Game Proposals

I am writing on behalf of the Chugach State Park Citizens Advisory Board regarding regulatory proposals that will affect Chugach State Park. Please consider these comments during the upcoming Alaska Board of Game meeting.

The Chugach State Park Citizens Advisory Board assists park staff in an advisory capacity with park management and development issues. As an advisory board, our decisions are guided by the five primary purposes established in creating the park:

- To protect and supply a satisfactory water supply for the use of the people;
- To provide recreational opportunities for the people by providing areas for specified uses and constructing the necessary facilities in those areas;
- To protect areas of unique and exceptional scenic value;
- To provide areas for the public display of local wildlife; and
- To protect the existing wilderness characteristics of the easterly interior area.

At approximately 495,000 acres, Chugach State Park is among the four largest state parks in the U.S. and comprises nearly half of Alaska’s Game Management Unit (GMU) 14C. Most of the big game animals that inhabit GMU 14C use the park at least part of the year. The 15-member advisory board is appointed by the director of state parks and intentionally represents a wide variety of park users. With over 1.3 million visits to the park annually, we are interested in Board of Game regulation changes that may affect park resources and visitors.

We have carefully reviewed the February 2017 Board of Game regulatory proposals that will affect the park’s wildlife and users. Our recommendations passed unanimously during our 14 November, 2016 meeting.

Proposal 152 – Support. This proposal would reauthorize antlerless moose seasons in Unit 14C, some of which are in Chugach State Park. We support antlerless moose seasons in the park to maintain moose populations near the low end (1,500 moose) of the subunit’s population objective to avoid overbrowsing of winter range and subsequent die-offs.

Thank you for the opportunity to respond to the regulatory proposals submitted for the February 2017 Board of Game meeting. Please let me know if you have any questions regarding these comments and recommendations. I can be reached at 907-688-9078. Thank you for your consideration.

Sincerely,

Rick Sinnott
Chair

cc: Dave Battle, ADFG
I am writing in support of Proposal 123 as that would provide a better hunting experience for local residents who hunt in this area. I also do not believe that it would be detrimental to the moose population of the area. Thank you.
I am commenting on the request submitted by Tommy Geyer Proposal 123 requesting the moose season be lengthened. I am in complete agreement with his submission as this has been my experience also. Thank you!
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
To: Alaska Dept. of Fish and Game – Board Support Section  
FAX: 907-465-6094  
ATTN: Board of Game Comments  
From: John Frost  
Date: January 26, 2017  
Reference: Comments for Interior/Northeast Arctic Region meeting – Fairbanks, AK Feb. 17-25, 2017

Dear Members of the Alaska Board of Game,

Most of you know me. I am a 43 year resident of Alaska living in Anchorage. I am an avid bowhunter and volunteer for many national and state bowhunting, conservation and education programs. I have hunted all of the Alaskan species of big game but especially enjoy mountain hunting for sheep. I have been a member of the Sheep Working Group set up by this Board. I have also been a representative for the Alaskan Bowhunters Association on the Thinhorn Sheep Group that met originally two years ago in Vancouver BC and is scheduled to meet in Anchorage in April this year.

There can be no doubt that we have problems with management and allocation of Dall sheep here in Alaska. For years there have been multiple proposals regarding sheep hunting and this year is no different. Proposals #56-66 in your current workbook all refer to Dall sheep. The fact that difficult problems exist was recognized by the Board and to your credit you established the “Sheep Working Group” moderated by Allistar Bath. Unfortunately, this skilled facilitator was unable to obtain a consensus regarding a solution. Some solutions were (in my opinion) not given adequate or any consideration. In particular the concept of limiting the method of take was never well discussed.
20 year experience with Archery hunting for Dall sheep in Alaska GMU 14-C

The following statistics are compiled from ADF&G statistics on Dall sheep harvest success over a 20-year period from 1993 to 2013 for the drawing permits in unit 14-C. Drawing hunts #140 & 141

Total permits awarded - 2424 =1845 in DS140 and 579 in DS141

Total permitees who actually hunted - 1500 =62%

Sheep killed 143 = 9.5% success for those who actually hunted.

4.9 days actually hunted for successful residents.

5.8% success for those who had the opportunity to hunt ie; permit holders.

Rams killed 106. Ewes killed 37. So about 3 Rams/Ewe killed even though these hunts are for “any sheep”

Rams killed 106 of those 67 were over 30”; 26 were over 36”;
10 were over 38” and 2 were over 40”
39 were under 30”

Making the assumption that rams over 36” are mature full curl rams
Then success rate for mature full curl rams among those who actually hunted was 1.7%

Total number of days actually in the field hunting – 6533
- 4.3 days average in the field for hunters who actually hunted
- 4.2 days average for unsuccessful hunters
- 5.0 days average for successful hunters
Non-Resident success
- 18 sheep were killed by non residents
- 12.6% of the sheep were killed by non residents
- Non-residents killed 10 ewes and 8 rams none were over 36”
- 4.2 days average for successful non-residents

The purpose in providing these statistics is to document that use of archery gear as a method and means of harvesting Dall sheep by its nature requires that hunters get much closer to sheep. As a result the harvest success level is significantly less than the harvest success with modern scope sight equipped firearms.

During the period of time that these hunts were conducted it was legal for a permit holder to harvest “ANY SHEEP” yet still there was a low success rate. If only mature rams greater than 36” are counted the success rate was only 1.7% of those who actually hunted. So restricting the legal methods of hunting has the potential to provide opportunity for hunting to a large number of hunters while minimizing the actual harvest of rams at a time when sheep populations are low. Note that restricting the means of hunting has not limited the number of hunters who apply for these very popular drawing hunts.

If the Dall Sheep Working Group determines that the Dall sheep population is low enough to require a significant reduction in the number of sheep harvested for the long term benefit of the sheep population, there are several possible alternative solutions.
- Close the sheep seasons entirely for some period of time as was done in unit 16-B for moose to allow the population to regenerate.
- Close the sheep seasons for alternate years as is done for brown bear in unit 9.
- Go to limited drawing permit hunts statewide possibly for both residents as well as non-residents.
- Stop all non-resident hunting, since nonresidents are more successful than residents and the Alaska Constitution favors residents over non-residents for harvest of wildlife resources.
Markedly limit the number of non-resident hunters by drawing permits that would allow only up to 10% of the sheep harvest as is done in most other states.

- Impose some variety of split seasons for all hunters to reduce crowding via various proposals.
- Limit methods of access such as has already been tried with PROP 207 limiting aircraft use (which has been shown to affect resident sheep hunters disproportionately, has added significant safety issues, has resulted in regulation pollution of the hunting experience, has resulted in some hunters not hunting and resulted in the formation of RHAK). I personally believe that 207 should be repealed. See my proposal #63.
- More severely limit methods of access such as walk in only from the highway system ie; no off road vehicles, boats, snow machines or aircraft to transport sheep hunters or their gear into sheep country.
- Limit the legal animals full curl as is done now or maybe even curl and a quarter or ten years old or double broomed with at least 6” circumference 1” back from the tip or greater than 40”.
- Limit the method and means of harvest such as conventional archery only or hunting implements with no optical sights attached allowed in the field. The advantage of these types of limitations is it would allow everyone who wanted to hunt the opportunity to do so and would not restrict guides from selling hunts in any way. Frankly, this option or the next one would be my preferred option. See Proposal#66.
- Have a series of hunts with gradually increasingly effective weapons but give earlier seasons and longer warmer days to those willing to hunt with restricted gear and make hunters choose their seasons. Example would be August 1-11 conventional archery only statewide; August 12-31 no optical sights on weapons statewide; September 1-20 no weapons restrictions. You could control hunters choosing their seasons by making all hunts registration. That would give very accurate information about how many hunters chose which seasons and their relative success rate.
The bottom line is that if it is necessary to significantly reduce the harvest of Dall sheep to protect the long term viability of the sheep population then some method must be chosen. There may well be other methods but I believe that I have covered most of them. It seems to me that limiting the methods and means provides the best opportunity to reduce the harvest rate and allow some rams to gain old age and true trophy size with out reducing the opportunity to hunt sheep for anyone willing to accept the limited range weapons.

My preferred solution would be Proposal #66 to have an archery season for sheep prior to the regular firearm season. This would reduce crowding on August 10th. It would provide guides with an extra hunt to sell if they were willing to book non-resident bowhunters. Not all sheep guides would choose to guide bowhunters but some would. The low harvest rate among bowhunters would not harm the sheep population. It should be noted that this proposal does not ask for "any sheep" or "any ram" but only for full curl, double broomed or eight plus years old.

I would also like to comment briefly on a couple of other proposals.

Proposal #71: To allow hunters over age 60 to hunt with crossbows. I OPPOSE this. Alaska already has provisions for disabled hunters to get a permit to hunt with crossbows so anyone too old or weak to pull a conventional bow could get a disabled permit. I am 71 years of age and still hunt with a compound bow well above the 50 pound minimum draw weight required by our regulations for hunting big game.

Proposal #72: To allow harvest of wolf and coyote by land and shoot methods with a trapping license. While I do SUPPORT this proposal, it must be realized that federal law still makes it illegal to disturb any wildlife with an airplane. So if this
regulation is passed by the Board it would be similar to marijuana being legalized by the state while still illegal under federal regulations. At this time it is legal to shoot fox, lynx and coyote on the same day as airborne as long as the hunter is more than 300 feet from the airplane. I would suggest that the Board consider allowing the take of wolf and wolverine in season by hunters or trappers who have been airborne as long as they are at least 300 feet from their aircraft. Predator calling is becoming increasingly popular. A hunter or trapper might fly out in the morning, land and hike several miles during the day and set up every half mile to call predators. Currently if he calls in a fox, coyote or lynx he can legally shoot it but if a wolf or wolverine comes to his call he can not shoot it. Allowing take of wolf or wolverine in addition to fox, coyote and lynx on the same day as airborne as long as the hunter is over 300 feet from the airplane would stimulate a significant increase in predator calling outdoor recreation by Alaskan hunters and trappers and would have negligible effects on populations of those species.

Proposal #112: To allow same day airborne hunting for wolf in Unit 25D. I also SUPPORT this proposal with exactly the same comments as for proposal # 72 above. Include wolverine, make it region wide with the provision that the hunter be 300 feet from the plane before shooting.

Thank you for your time and consideration of my comments.

Sincerely,

John D. “Jack” Frost
jackfrost@gci.net
907-360-1301 FAX 907-562-5742
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

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

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
Support proposal 123

As author of this proposal, I wanted to give a few more reasons why I feel it would be helpful.

The Tanana Valley is heavily wooded in Eastern 20D. Vantage points to spot and stalk bull moose are few. An extended season in this area which would also include Johnson Slough Island would increase hunter's odds of calling in a bull moose.

The Tanana Valley in Eastern 20D is pretty dead (in regards to moose activity until about the 13th of September, which leaves very little opportunity for a hunter to be successful.

I am not from Dot Lake, but was hoping for a better opportunity for them and other desperate local hunters. The community of Dot Lake is averaging about one moose per year for their entire village. The are having to scrape up road kills off of the highway just to try to get some meat for the winter. I have spoken to locals from Dot Lake who hunt moose, and they believe that an extended hunting season would help them with their moose harvest.

I realize that the Delta Advisory Committee did not support this proposal, which did not surprise me. I understand that several abstained, but I'm not sure of the actual vote. Two reasons were relayed to me as to why:

1. **As moose would be coming into rut, meat quality would be poor.** My thoughts on this are that many, if not most of the moose seasons in Alaska are open until the 20th of September, and some open as late as the 30th.

2. **Eastern 20D would be inundated with road hunters** The moose season in Unit 12 (just due east of SE20D) is open until the 18th of September, alligning the 2 units for 18 days. My personal observation is an influx of road hunters at the beginning of the season, and that pressure seems to dwindle as the season progresses. If this is a serious concern to the Board of Game, I would like for you to consider at least extending the season to the 18th of September, thereby aligning it with GMU 12 to the east. If not a serious concern, then until the 20th of September.

In conclusion, I would like to point out that ADF&G is neutral on this proposal, meaning that there are plenty of moose to sustain a modest additional harvest. If they were concerned about overharvest, cow-calf ratios or the moose population in this area, they would certainly not be neutral. Thank you for your consideration. 

Tom Geyer
As the original author, I continue to support proposal 49 in both its original form and as amended by the Board to apply statewide. I understand the Board’s hesitancy to adopt the proposal as amended, given the sharp and well deserved criticism for past board generated proposals. Although this change technically triggers a board generated proposal, we can all agree that this is a different situation than those the Board has been condemned for in the past.

My intent for this proposal is for it to eventually apply statewide. Modifying it to apply statewide and adopting it during the Interior Region meeting meets this objective in a timelier manner. The public has had ample time to review and comment on the effect of statewide implementation, since this was first discussed in November and then again at the Arctic and Western Region meeting in January. The comments, from both the public and the advisory committees, have been overwhelmingly in favor of adopting this proposal. Comments opposed to the original proposal 51 to restrict the bag limit statewide vastly outnumbered those in support. The Department of Fish and Game has also stated their preference that this proposal be adopted statewide, rather than piecemeal. Delaying adoption of this proposal creates additional costs and burden to the Department as they work to implement a system to track and report second degree kindred (2DK) participation. A delay of this proposal to the 2018 statewide meeting puts the implementation of the resident bag limit restrictions just a few months away from a potential resolution, which will jeopardize hunt planning for those that may wish to participate in a hunt with their family members.

I urge the board to adopt proposal 49 to apply statewide. I also urge the Board to reject substitute language as proposed by the guide lobby at the Arctic and Western Region meeting as RC28. The intent of their proposed amendment is to further subsidize the tags that have been granted exclusively to guided non-resident hunters by removing 2DK non-residents from the non-resident pool and placing them in the resident pool of tags. I trust the Board would not look to further restrict resident allocation in this manner.
Comment on Proposal 104: As a member of the community of Kaktovik and a representative for Kaktovik on both the state’s North Slope advisory committee and the federal North Slope regional advisory committee, I oppose proposal 104 to extend the Porcupine caribou seasons in Unit 26C. I am speaking for Unit 26C. We like the current season. We like to give the caribou a month or so to move because they are migrating when they show up and then they are calving. This provides time for the calves to become stronger. We do not hunt them in June except during the week long bull season. It has been this way for a long time. We wish to keep the current seasons and make no changes.
Good morning Jeff,
Yes my proposal was, and is for the board of game to place a 1/4 mile no shoot zone on both sides of the road during any open Caribou hunt.
The reason I only specified Caribou is because of the nature of the hunt. When the Caribou are in there are hundreds, sometimes thousands of animals. Hunters go crazy, they shoot on, from, and across the road, regardless of background. This is contrary to existing State law. Further they often leave gut piles in or along the road. Also contrary to existing law.
This hunt has gotten to be way out of hand is is a public hazard.
I believe the 1/4 mile no hunt zone on both sides of the Taylor Highway, and Top of the world highway is the best way to bring this under control, and is in the best interest of the public, and the Caribou herd.
As for hunting other species such as bear, moose and birds, these hunts haven't had the impact that the Caribou hunt has had... Altho, I believe the State law should be enforced as to shooting from, on or across the road for any hunt.
I hope this helps. Any further questions are welcome.,
David Likins
Fortymile River, Alaska

On Fri, Oct 21, 2016 at 1:46 PM, Gross, Jeffrey A (DFG) <jeff.gross@alaska.gov> wrote:

Hi David,

I need to ask you a clarification question about your Fortymile Caribou Board of Game proposal. It was my impression that you intended to establish a no shoot corridor along the Taylor Highway and Boundary Cutoff roads for caribou only. But F&G Boards support interpreted your proposal as asking to have a ½ mile no hunt corridor, during caribou season, that would apply to ALL species (including moose, bear, grouse, etc). A no shoot corridor for all game species is obviously a substantially different proposal than just for caribou. I am drafting the department analysis and recommendation for your proposal and I need to clarify this, so I know how to write the analysis.

Also, if your intent was just for caribou, I’ll need to ask you to submit a comment to the Board of Game, through Nissa Pilcher in Fairbanks, clarifying this point. I have cc’d Nissa so you have her email.

Thanks David!

Jeff Gross
Douglas Malone Comments to the Alaska Board of Game

Region III, Fairbanks, February 2017

Good afternoon. Thank you, all Board members and staff, for the large time commitment you put into public service via this board. Douglas Malone writing; what follows is my personal comments on the proposals before you this cycle for the Interior and NE Arctic Region. Thanks in advance for your consideration of my thoughts.

PROPOSALS SUPPORT: 46, 49, 50, 63, 68, 72, 81, 94, 95, 97, 105, 113, 127-9,
PROPOSALS OPPOSE: 64, 83, 93, 100, 159, 141, 142

PROPOSAL 159, OPPOSE moose hunter education in Unit 15. I oppose the adoption of proposal 159. This idea was submitted as an ACR and accepted as a proposal at the October telephone meeting. This is clearly out of cycle and shaky in opportunity for public comment. It is notable that the proposers did not seek comment from other local, affected, fellow Unit 15 Advisory Committees, neither in drafting the original ACR, nor soliciting support for the proposal. The proposers point to a high sub-legal bull moose harvest as their conservation basis. However, what the proposal doesn’t say is that Unit 15 is the only place in the state with general season moose antler sealing requirements (just adopted 2 years ago), so in effect it is the only Unit where such a number (number/percent of sub-legal take) would even exist in data. I would wager that similar percentage of sub-legal moose are taken anywhere moose antler restrictions exist (most of the road system). The proposer states a conservation concern but we are at the high end of population objectives and have been meeting the harvest objective.

This is really a case of hunters responsibility. As hunters, we take the onus of expectancy to know license requirements, land ownership, animal appearance and habits, firearms safety, upholding ethics etcetera and most of us do so gladly. If a person needs some education on a particular subject, he would obtain that, it is ever increasingly easy to do so. Without an additional mandate. Overregulation is not the answer. Enforcement would go a long way toward forcing
compliance...just some presence out on the trails would be enough. I know AWT budgets are tight, but I did hear from our local troopers that they have a directive to make a presence next season. I welcome that and think the sublegal take would diminish greatly. What about the idea of some department presence in the field during season? Schedule a browse survey, show up in blue hats; most people (sadly) don’t differentiate between AWT and biologists so this would be in effect a deterrent to being hasty in judging that moose.

This proposal should be tabled until such time as sublegal take in other railbelt units can be quantified, so as to not unduly restrict Peninsula hunters over other road system hunters with regulatory pollution

**PROPOSAL 51: SUPPORT as amended** in Bethel RC#28 (change wording from “plan” to “program”)(Restricting Nonresidents first when a population is not reaching IM goals). This is a bright new idea I am in support of. If we have an active IM program on a wildlife population to provide for high level of human harvest for Alaskan residents’ beneficial uses under IM law, there is no reason to allow nonresident take if we follow statutory preferences in 16.05.255d and 16.05.258 for subsistence first, followed next by personal use by residents second, and nonresident commercial, sport or otherwise third. I believe this can be condensed by saying that nonresident use of a population with a C&T finding should not be permitted if the harvestable surplus is below the ANS. Perhaps the best way to posit this is to consider the reciprocal: If we had taken steps such as restricted nonresident take earlier, perhaps the State of Alaska’s reliance on and expense of Intensive Management would not have been needed in a particular population in the first place; indeed IM carries both a large fiscal note and myriad public concerns. In my opinion, Proposal 51 matches and complements the statutory intent (to first provide high levels of resident human consumptive use i.e. meat for Alaskan residents) and seems common sense to me. Considering the pushback of “nonresidents’ meat largely benefitting village residents, I would counter by commenting that:

a) donated meat normally goes only to the nearest village, not distributed equally amongst those regional Alaskans.

b) Donated or gifted meat has been seen by some as arriving in poor condition for human consumption.
c) I would wager that a majority of residents would RATHER harvest their own, in accordance with personal preferences in field care and butchering, and in the interest of furthering the hunting tradition to future generations.

d) The practice of “gifting” meat should be forbidden. In going hunting, we as hunters should be expected to use the animal to the extent practicable. Eat the meat, wear the fur, hang your jacket on the antlers when you go to the outhouse. Hunting is not a sport, it is a means to provide.

PROPOSAL 52: SUPPORT draw allocation at 10% NR max. I look at this proposal as forward-thinking and progressive. It is true there are not many instances of mis-allocation in current draw hunts, but our climate of hunters and game is changing at a great rate. A lot of hunts have gone to draw in recent years. Shifting pressure. It would be wise to get in front of future resource conflicts by codifying a 10% maximum permits allowed regulation. Discussions that now revert to an interpretation of an older, regressive Board finding 2007-173 BOG will be streamlined.

PROPOSALS 53-56: I support the direction the proposer is going with these language changes. Subsistence take has priority in statute, Alaska residents should be included in all related language in code.

Proposals 57 through 62: The allocation of sheep issue. I support a 10% cap and SUPPORT PROPOSAL 62 as the best of this years’ crop of public proposals asking the Board to restrict nonresident sheep harvest, in that it best includes the necessary steps of implementation: a statewide nonresident harvest guideline level and nonresident draw in order to implement, and also is directed at harvest, not just permitted hunts. In light of the ongoing sheep population declines and increased user 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 harvest 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 in context 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) and apply statewide. Not only would limiting Nonresident sheep take 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 the interior region as a precursor to statewide applicability.

PROPOSAL 63: SUPPORT removal of aircraft restrictions for sheep hunting. You have had earfuls of antagonism of this in the last couple cycles since quickly introducing and passing this Board-generated proposal into regulation. This has had no effect on sheep numbers, empirically speaking of course. This has actually had a negative effect on crowding as well as extended the time that the field is inundated with people. Before, the commercial interests could at least have the field to themselves the week or two prior to opener. Now I see “decoy tents” and camps going up in July. The Board Finding addressing the intent of this rule is not sufficient to alleviate my concerns as an ethical and respectful hunter trying to also access remote Alaska and maintain safety for myself and others. The regulation still reads the same. Very difficult enforcement job for our overextended AWT. Please faithfully consider Proposal 63 and thank you for reading.

PROPOSAL 64: OPPOSED I asked several Kenai Peninsula ADFG managers about the measured effect this has had on goat populations (where similar nanny take penalty has been in effect for some time). They were unable to point to any population increase as a result.

PROPOSAL 83: OPPOSED to adding a Mulchatna Caribou nonresident hunt: 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, 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 51, why are we allowing ANY nonresident harvest before meeting the needs of Alaskans? Back in the mid-late 90’s Mulchatna caribou was a fantastic opportunity for everybody, I urge the Board to reject Proposal 83 and let the herd and that opportunity return.

**PROPOSAL 93: OPPOSE** removing Bettles winter road exemption. The Bettles winter trail is a state easement and uses public funds for maintenance. The State should stand up to the BLM for access rights in re the Central Yukon Management Plan under review by BLM.

**PROPOSAL 94: SUPPORT** modification of 21D moose season for meat care concerns. Thanks to the Board for implementing a similar change to Kenai Peninsula moose season back in 2015, local hunters have had better meat care conditions in the last couple years as a result. Having a fair bit of experience in Unit 21 moose hunts, I support a similar direction here.

**PROPOSAL 95: SUPPORT** changing DM 812,896 to registration hunts. I have had the good fortune to have hunted both of these in the last 4 years. Hunter participation is historically low due to remoteness and pressure is minimal. On the Dulbi in over two weeks of aircraft-supported float hunting, I saw zero other hunters in 40 miles of river. On the Hog, we saw one other float party and one guide with a single client in 2 weeks on the river. Really excellent country and wilderness character hunts and I would love the opportunity to return without the need to draw a permit. Some of us really enjoy remote logistical and meat care challenges.

**PROPOSAL 97: SUPPORT** removing MBG for moose. I do not believe the Board of Game has the authority to add species to Must-Be-Guided statute, as they have with moose in Unit 21 and 24, and black bear in Southeast. AS 16.05.255a(10) gives the Board very broad authority, but not so broad so as to undermine the intent of the legislature in AS 16.05.407, to further subsidize commercial interests, and to in effect benefit nonresident hunters over resident hunters.

**PROPOSAL 100: OPPOSE** no fly caribou hunting. 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. This would be extremely hard to enforce for our AWT. 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. See also my comments on proposal 63 above. Please vote no on Proposal 100.

**PROPOSAL 105: SUPPORT as AMENDED by ADFG.** I have had considerable personal experience watching the CAH decline and do not understand why we still allow nonresidents to harvest 5 caribou. I think they only want one to hang on the den wall, and 5 animals worth of meat, per nonresident hunter, is an awful lot of meat to “donate” to not very many villages that are spread far apart. ADFG has amended the original proposal in their comments to be stricter, and I support the amended proposal.

Thanks again for considering my thoughts. I look forward to the deliberations, and to speaking with you all in Fairbanks!
I would like to formally support Proposal 19 - 5 AAC 92.130 and the removal of an unfair and punitive rule that unjustly punishes the resident hunter who only wanted to share a hunting experience with his or her 2nd degree kindred. The rule, as it currently stands, is unfounded and does nothing but put undue restrictions on the resident hunter. Nothing else beyond this is achieved by leaving this rule in place. Please support the immediate removal of this rule as it unjustly undermines the original intent of the 2nd degree kindred authorization. Let's not alienate our residents. Let's go forward and get this one off the books as this rule is not a matter of conservation but one of discrimination against the resident hunter.
In Reply Refer To: 10.D. (AKRO-NR)

IN REPLY REFER TO:
10.D. (AKRO-NR)

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BOARDS

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 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 February 17-25, 2017 meeting in Fairbanks that have the potential to affect National Park Service (NPS) areas in the state.


This proposal would open an archery-only hunting season for Dall sheep in the Interior/Northeast Arctic Region including GMUs 12, 19, 20, 21, 24, 25, 26 which includes areas of Gates of the Arctic National Park and Preserve, Denali National Park and Preserve, Lake Clark National Park and Preserve, Wrangell-St. Elias National Park and Preserve, and Yukon-Charley Rivers National Preserve. The NPS does not support extending the season in areas where harvest is not limited by quotas and sheep populations are in decline. For example, Gates of the Arctic National Preserve (GMU 26A) has a popular general hunt and extending the sheep hunting season has the potential of increasing harvest following a large decline in 2013. These proposals should be evaluated on a unit-specific basis to ensure conservation of specific populations rather than applied state-wide. Because these proposals create a potential for increased sheep harvest in a time of declining sheep populations, we ask that NPS lands be excluded if this proposal is adopted.


This proposal would lengthen the season for bear baiting in the Interior/Northeast Arctic Region, which includes NPS Preserve lands. 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.


This proposal would allow the harvest of wolf and coyote by land and shoot with a trapping license in the Interior/Northeast Arctic Region (GMUs 12, 19, 20, 21, 24, 25, 26B & C), which includes areas within Gates of the Arctic National Park and Preserve, Denali National Park and Preserve, Lake Clark National Park and Preserve, Wrangell-St. Elias National Park and Preserve, and Yukon-Charley Rivers National Preserve. Same-day airborne taking of wildlife including coyote is prohibited by NPS regulations.

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.


This proposal would allow the use of dogs to hunt coyote in Unit 20 including portions of Denali National Preserve and Yukon-Charley Rivers National Preserve. Excepting black bears, the use of dogs to hunt big game or fur animals is currently illegal under State regulations and the NPS supports this restriction to protect wildlife populations from disease, injury, and harassment. The proposal also references the action as a means to increase small game populations for hunters and, therefore, would conflict with NPS regulations that prohibit predator reduction efforts with the intent to manipulate predator/prey dynamics.

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.


This proposal would expand the Copper Basin community harvest hunt area by adding a part of Unit 12 including that portion within the Nakesna River drainage west of the east bank of the Nakesna River upstream from the southern boundary of the Tetlin National Wildlife Refuge. The proposed expansion area is entirely within the boundaries of Wrangell-St. Elias National Park and Preserve. The Wrangell-St. Elias National Park Subsistence Resource Commission has expressed concerns about the potential for increased hunting pressure in Wrangell-St. Elias National Preserve that could result from this expansion in an already sees high numbers of hunters and significant hunting pressure. Additionally, they feel that the community hunt is not working and have recommended discontinuing the community hunt and starting discussions with stakeholders in the Copper Basin about alternatives. We support the Commission’s recommendations to oppose expansion of the hunt area until stakeholders are engaged to discuss options.

This proposal would modify the hunting season and bag limits for grouse in Unit 12, including areas within Wrangell-St. Elias National Preserve, to reduce take from fifteen per day, thirty in possession Aug 10 - Mar 31 to a daily bag limit of five grouse per day with a possession limit of ten, except two per day and possession limit of four, for ruffed grouse August 20—November 10. The NPS agrees with the proponent of this proposal that the existing the bag and possession limits are likely too high given the current hunting pressures, especially in road accessible areas. Large groups of hunters are often observed along the Nabesna Road (GMU 11 & 12) and McCarthy Road (GMU 11) who harvest their limits, resulting in significant take of grouse. The NPS supports the proposed change in harvest and possession limits for grouse; however, we recommend modifying the proposal to retain the existing season dates to maintain the opportunity to harvest grouse in the winter.


This proposal would shift the hunting season for wolf in Units 24 including portions of Yukon-Charley Rivers National Preserve 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.


This proposal would lengthen the brown bear hunting seasons in Units 25A, 25B, 25D, 26B and 26D including areas within Gates of the Arctic National Park and Preserve and Yukon-Charley Rivers National Preserve. This proposal would open the State season 8 days prior to the Federal season, which may negatively impact federally-qualified subsistence users. This proposal is not consistent with efforts to align State and federal seasons. It would increase the complexity for Alaskans trying to abide by all applicable State and federal harvest regulations.


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 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 141 would close small portions of Unit 20 adjacent to Denali National Park and Preserve to the taking of wolves. Based on scientific research, we found that limiting harvest of wolves along the boundaries of protected areas was associated with increased wolf-sighting opportunities for visitors to these areas. This in turn could increase associated economic benefits to adjacent communities. We continue to support the protection of wolf-viewing opportunities in Denali National Park and Preserve and will attend the February meeting to testify and answer any questions.

Proposal 142 would close more of Unit 20 to the taking of wolves than would proposal 141. While the NPS proposes something more modest, the Park Service also supports proposal 142 as a strategy to increase wolf-sighting opportunities and associated economic benefits to adjacent communities.

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 NFS-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,

[Signature]

Debora Cooper
Associate Regional Director
Alaska-Yukon NAVHDA  
20508 Mark Circle  
Chugiak, AK 99567

January 10, 2017

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:

The Alaska-Yukon Chapter of the North American Versatile Hunting Dog Association submits these comments in opposition to Proposals 47, 91, and 116. Alaska-Yukon NAVHDA has 36 members who are active both training and hunting with dogs. Alaska-Yukon NAVHDA is a sanctioned chapter of NAVHDA, one of the largest hunting dog organizations in North America, and is dedicated to fostering, improving, promoting, and protecting the versatile hunting dog; to conserving game by using well-trained reliable hunting dogs on both land and water; and aiding in the prevention of cruelty to animals by discouraging non-selective and uncontrolled breeding, which produces unwanted and uncared for dogs. Alaska-Yukon NAVHDA conducts yearly NAVHDA-sanctioned hunting tests, hosts professional training clinics, conducts member led training events, and provides the resources to enhance the training of versatile hunting dogs. These proposed regulations would have significant negative impacts on our dedicated and responsible members.

PROPOSAL 47 - AAC 92.990(A)(26). Definitions. Modify the definition of edible meat for all game birds as follows:

“Edible meat” means, …; **for all game birds, the meat from the breast, back, thighs, legs**; replaces [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 of 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 ….

Alaska-Yukon NAVHDA Comments: **We oppose this proposal.** Alaska-Yukon NAVHDA made similar comments on proposals submitted for the March 2016 and January 2017 BOG meetings. We find this proposal without basis, over-bearing, and impractical. The proposed requirement would not significantly impact the conservation of the animals it seeks to protect. There has been no evidence presented that the meat from small game birds is being wasted or that there is a threat to these species.
Although we applaud the conservation ethic of the proponent, we believe Proposal 17 goes too far. We agree with the BOG decision to require the salvage of leg and thigh meat from larger game birds like cranes, geese, and swans, however, for smaller game birds like grouse, ptarmigan, snipe, and ducks, these parts are extremely small and often essentially inedible. When this small amount of meat is not taken, the carcasses are consumed by other animals. Further, our members are dedicated to preserving the birds that we hunt and consume, and we often harvest this additional meat on our own fruition.

**PROPOSAL 91 – 5 AAC 85.065. Hunting seasons and bag limits for small game.** Modify the hunting season and bag limits for grouse in Unit 12 as follows:

In Unit 12, a daily bag limit of five grouse per day with a possession limit of ten, except two per day and possession limit of four, for ruffed grouse August 20 - November 10.

**Alaska-Yukon NAVHDA Comments: We oppose this proposal.** According to ADFG reports, sharptailed grouse lek and ruffed grouse drummer counts are up and there is currently no conservation concern for grouse in Unit 12. The ruffed grouse limit should not be reduced to two per day and four in possession in this part of the state because their numbers appear to be increasing or near their peak in the approximately 10-year cycle. Curtailing the season at November 10 also seems unwarranted as hunting tends to drop off during the cold season in this part of the state. There is little reason to reduce the opportunity for hardy hunters who may be out during the extended winter season when the grouse harvest is likely very low.

**PROPOSAL 116 – 5AAC 85.065. Hunting seasons and bag limits for small game.** Reduce the bag and possession limit for ruffed grouse in Unit 20D as follows:

Unit 20D, that portion lying west of the east bank of the Johnson River and south of the north bank of the Tanana River: fifteen per day, thirty in possession, provided that not more than five per day and ten in possession may be sharp-tail grouse, and not more than five per day and ten in possession may be ruffed grouse. Aug 25 – Mar 31

**Alaska-Yukon NAVHDA Comments: We oppose this proposal.** If adopted, this proposal means that in this area a bird hunter would only be able to reach the 15 grouse per day limit if not more than five are sharptailed grouse, not more than five are ruffed grouse, and the remainder were spruce grouse (up to 15 spruce grouse if no other grouse species is harvested). At present there is no conservation concern for ruffed grouse or sharptailed grouse because populations are near their peak in the cycle. Additionally, non-consumptive uses such as bird watching the ruffed grouse courtship displays and sharptailed grouse lek are not in danger because the hunting season is not during that time.

While there might be a desire to align ruffed grouse harvest limits with those of sharptailed grouse at five per day, neither limit aligns with recent survey information. Sharptailed grouse numbers in this area may have been low in previous years, but that
situation has reversed making five per day limits unnecessary. Ideally bag limits should be adjusted according to population surveys and densities, however we understand that ADFG may lack the budget or manpower to make annual adjustments. A new brood survey program could help fill information gaps in the future if continued. Alaska-Yukon NAVHDA members have participated in the ADFG brood surveys with well-trained pointing dogs to assist ADFG with grouse and ptarmigan productivity assessments. Several members plan to continue assisting ADFG with those efforts.

In summary, Alaska-Yukon asks the Board to reject the three proposals above and thanks them for the opportunity to comment.

Sincerely,

Scott J Breitsprecher
Scott Breitsprecher
President, Alaska-Yukon NAVHDA
Submitted By
Shawn Osborn
Submitted On
9/28/2016 12:14:58 PM
Affiliation
moose hunter

~~I Moose hunt about 37 mile up the Salcha River. I access my hunting spot from the Yukon Training Area on Army land. I hunt approximately 1 mile north of the Salcha River. I hunt in the area for 10 days or until I get a moose. This year I did not get a moose nor did I see one. I saw no fresh sign.
I have noticed a big increase in air boat activity this year. On September 9 and 10 I literally heard air boats all day, not 1 minute of quiet. The rest of the time I could hear an air boat about 70% of the time. They just go up and down the river looking for moose. To me that’s not hunting, it’s a waste of fuel, its lazy, creates excessive noise pollution, it’s disrespectful to other hunters and animals don’t like it.
I hunt from a blind and I scrap and call. I cannot hunt effectively with that noise plus. I think it’s really rude that these guys run these really loud boats because it ruins my hunting experience. I also heard jet boats and outboards, but these are relatively quiet compared to the airboats.
I have heard similar complaints about airboats from guys hunting the Salchaket Slough and guys up north hunting near the Sagavanirktok River.
In my opinion Air boats need to regulated. They are negatively affecting other hunters, the air boat owners that I have talked to have the attitude “I can do whatever I want, if you don’t like it too bad”.

Submitted By
Shawn Osborn
Submitted On
10/24/2016 4:39:24 PM
Affiliation

Reduce the non-resident draw hunts to 10% or less.
Allow bison draw hunts for Alaska residents only.
Please stop giving into the commercial guides and the wealthy, take care of Alaskans first!
Big game hunting in this state is not a sport to all people, many of us rely on the meat as a food source.
Thank you for your consideration.

Submitted By
Shawn Osborn
Submitted On
10/24/2016 3:37:27 PM
Affiliation

I am very concerned about the antlerless cow moose hunts in unit 20B. I feel like ADFG needs to reduce the harvest of antlerless moose. I have seen a big drop in the number of moose sightings, especially in the areas that I moose hunt (of course). I have friends that live off of Eielson Farm road, Johnson road, 20 miles north of Fox and in west Fairbanks that have been complaining about the same thing. I know you have heard this same thing from lots of other people.
I have spoken to Biologist Tony Hollis with ADGF recently, he says the population is hanging steady at around 12,000 moose in unit 20B. If that’s the case where the heck are all these moose at?
I think the public needs another "moose news" published, we want to know what is really going on.
Please take a good hard look at this issue. Rumors are going around that the state is using Draw hunts to bring in revenue. I hope that’s not true. My family relies on Moose (mostly) and Caribou as a food source and I hate to see that go away.
Thank you for your consideration
Submitted By
Steven H Perrins II
Submitted On
1/26/2017 10:21:56 AM
Affiliation

Regarding PROPOSAL 82 - This proposal is extremely unjustified. The main reason more residents are not hunting this area is because of the access and expense to get out there, not because of the guides. Having a drawing for sheep in this one area will effectively put us out of business for guiding sheep. As Alaska’s Oldest Hunting Lodge it is simply wrong to do that to us just because some one else wants the sheep instead of us. We are resident hunters ourselves and conservation minded first. More opportunity for the growing demand of sheep hunting is the issue, so maybe we should close sheep hunting all together to let the sheep populations grow for a few years. Or stop subsistence hunting for sheep which ironically just oppened in this area a couple years ago - we should only be harvesting mature rams, not any ram. Guide use areas is a much better solution and should be the focus to give resident hunters a better experience. Also limiting airplane use for sheep hunting will eliminate the guides and hunters that are not conservation minded and fly from area to area hunting out all the sheep. A proposal to change that is now in effect and should be turned down. Guided hunts have historically had a better success rate because they put the time and money in to be successfull, a resident hunter that only spends a weekend in a new area to hunt is always going to be less successful. That is not justification for cutting guided hunt opportunity. Remember guides are mostly all Alaskan residents - so you’re not just taking away opportunity from non-residents but from residents who make their life and living on these resources. If there are conservation reasons for doing this, that is another story and several options should be brought to the table. Sheep working grups are working on solutions to this concern but at this time I see this option as a poor solution to a complicated issue.

Submitted By
Steven H Perrins II
Submitted On
1/26/2017 9:22:40 AM
Affiliation

Regarding PROPOSAL #113 - I Support this proposal as is but also suggest an amendment to change it to one ram. With all the sheep issues in our state and the fighting for allocation rights, it is absolutely assured that any one should be able to shoot three rams a year, never mind three of any sheep. If there was plenty of opportunity to go around that would be different, but there is not and people are trying to take away my rights to hunt and guide for sheep while some other resident is allowed to shoot three! How is that fair or right? I was born and raised in Alaska and lived here my whole life? Why is it fair that someone else who was born and raised here gets three of any sheep and I can only shoot a full curl ram? I need the sheep to live on just as much as they do because I make my living off guided hunts to put food on my table and feed my family - sounds like subsistence, so maybe I should get three? There is no reasonable logic behind any answer to that question, especially in the light of all the sheep issues facing our State right now. Again - if there was plenty of sheep, than it wouldn’t be an issue, but when there’s not - the allocation needs to be fairly split. This is detrimental to the conservation of sheep in our State and very selfish and short sighted.

Submitted By
Steven H Perrins II
Submitted On
1/26/2017 9:22:40 AM
Affiliation

Regarding PROPOSAL 78 - As the Operation Manager for Rainy Pass Lodge - Alaska’s Oldest Hunting Lodge, I see a conservation issue with this proposal. We hunt brown bear in unit 19C and just over the line in 16B. From everything we see there is not enough brown bear to warrent the extended season. 16B has been harvested pretty hard with the liberal season and that is overflowing to some of the bears that go back and forth between 16B and 19C. We see far fewer bears in 19C than we do in 16B, so even though all around 19C has a longer season, we believe that is justified. It is true that we could benefit financially from this proposal passing but we hold the conservation aspect to a higher standard than the short term financial gain and that is why we are opposing it. We did not become the oldest hunting lodge by putting finances before conservation. Thanks for your time and please vote down this proposal.
Proposal #82  Require a draw with a limit of 80 Rams in unit 19C. I do NOT support this proposal. I have hunted Sheep in Unit 19C almost every year since 1982 and have not seen or been involved in any conflicts or crowding in the field. I believe Dr. Wayne Heimer of Fairbanks is correct that there is no biological reason to support a draw hunt for non-resident hunters anywhere in the state.
February 1, 2017

**Resident Hunters of Alaska (RHAK)**

Comments to Alaska Board of Game

Fairbanks Interior/Northeast Arctic Region III Meeting

February 17-25, 2017

Proposals we **support**: 49, 51, 52, 57, 58, 59, 60, 61, 62, 63, 97, 105, 106, 126

Proposals we **oppose**: 82, 83, 100

**Proposal 49 – 5AAC 92.130 Restrictions to bag limits.**

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

**SUPPORT**

RHAK supports Proposal 49 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, and per discussion at the Bethel Region V meeting last month when this same proposal was deliberated as Proposal 19.

This proposal is the result of “Proposal 51,” submitted by the Alaska Professional Hunters Association (APHA) and passed by the Board of Game at the 2016 Statewide meeting, that changes the intent and language of AS 16.05.407 (the “must-be-guided” law), by placing bag limit restrictions on resident Alaskans who accompany nonresident relatives within 2nd degree of kindred for a must-be-guided species.

Under this new regulation, after a nonresident hunter – accompanied by a resident relative within 2nd degree of kindred (2DK) for a must-be-guided species – successfully hunts and harvests an animal and leaves the state, the resident relative who accompanied that hunter does not have an opportunity to hunt that same species that same regulatory year because s/he has been forced to forfeit their tag and opportunity for that species. In
areas where we have restrictions to opportunity such as bear harvests limited to one-in-four years for both residents and nonresidents, that resident hunter cannot hunt brown bears in that area for four years.

There are no such limitations on licensed resident big game guides who may accompany multiple nonresident clients (for compensation) for those species each year. For example, if a resident guide wishes to hunt spring bear on the peninsula, fill his or her tag, then guide one or more nonresident bear hunters during the fall season (again, for compensation), that is perfectly lawful under this new regulation. Or if a resident guide guides nonresident sheep hunters for the first 20 days of the season, and then wishes to hunt under his resident tag in September, that is perfectly lawful. Another example is if the Board ever introduced earlier seasons for residents for any must-be-guided species, a resident guide could hunt that earlier season, punch his or her tag, then take out multiple clients for that same species during the rest of the season. This is something that many guides have said they would do if the Board ever introduced earlier resident-only seasons for sheep. In all of these examples, the resident Alaskan hunting with a 2nd-degree-of-kindred relative is denied the same privilege as a resident guide.

The Board of Game when passing the original APHA Proposal 51 did not base these new restrictions on resident hunters on any conservation or social concerns, nor on any accurate data from the Department of Fish & Game on actual numbers of nonresidents who hunt with resident relatives for a must-be-guided species.

In fact, new data is out, supplied in December 2016 by the Big Game Commercial Services Board, that lists (anonymous) guided hunt record data going back more than twenty years. It shows, for example, the total number of nonresident guided sheep hunters annually, listing both successful and unsuccessful. This data can be used to approximate the number of unguided nonresident sheep hunters who hunted with a resident relative within 2nd degree of kindred, by tallying the total number of nonresident sheep tags sold each year, and subtracting the nonresident guided sheep hunters.

Our calculations using the data from the BGCSB and the data from ADFG big game tag sales shows that over the last five years, nonresidents hunting with a resident relative for sheep accounted for 16 percent of the total nonresident sheep hunters. Meaning, 84 percent of all nonresident sheep hunters in the last five years were guided.

The audio recordings of the Board of Game deliberations on the guide lobby’s proposal in the end came down to which had “more value,” a
nonresident guided hunt, or a nonresident unguided hunt with a resident relative. No conservation concerns. No crowding concerns. No biological concerns. **No reason at all to restrict resident hunting opportunity.**

The Alaska Board of Game is supposed to represent resident hunters and the wildlife resource. They are not supposed to represent the guide lobby. They are not supposed to be making “value” judgments that have nothing to do with any conservation or social concerns.

**Proposal 51** – 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.

**SUPPORT** with these amendments:

Nonresident hunting shall not be allowed for any prey species in the Interior/Northeast Arctic Region currently or in future under an Intensive Management Predation Control Program [PLAN] until the minimum population or [AND] harvest objectives have been reached.

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 program in Region III until the minimum Intensive Management harvest or population objectives have been reached.

Intensive Management 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 programs, and until the population or harvest objectives are met for any prey species, there should be no competition for food from nonresident hunters.

Proposal 52 – 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.

SUPPORT

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 III, 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.

Proposal 62 – 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 Interior/Northeast Arctic Region.

SUPPORT

For the past 10 years, resident hunters have come before the board explaining the unfairness of unlimited nonresident sheep hunting opportunities in various parts of Region III and how it was negatively impacting resident hunting opportunities, success rates, and the sheep resource itself.

In parts of the Interior, nonresident guided sheep hunters harvest 60-80 percent of the total sheep harvest each year, and 40-45 percent statewide. The Board is well aware of the problems associated with this and has told the public over many years that their solution was a "Guide Concession Program" that would limit guides. This allowed the Board to continually stall and decline proposals from residents that sought to limit nonresident guided sheep hunters.

The Guide Concession Program has a 1-million-dollar fiscal note and is effectively Dead-On-Arrival in the legislature. The solution was never about
limiting guides, which is completely outside the Board of Game’s purview. The solution was and is to limit nonresident guided sheep hunters.

The Board has before them at this meeting several proposals seeking to limit nonresident sheep hunters via a harvest allocation under 5AAC 92.008, and the allocations vary from a 10 percent nonresident sheep harvest by subunit to a 25 percent nonresident sheep harvest by subunit.

It confounds any rational person when they hear the Board over many years acknowledge that we have a serious problem with the number of nonresident guided sheep hunters, support spending hundreds of thousands of dollars on a scientific sheep survey and a Sheep Working Group, yet continually take no action to address this issue and continue to promote as their solution—which it should be noted is the guide lobby solution as well—something that will likely never happen.

This proposal seeks to codify a clear resident sheep hunting and harvest priority in Region III that is long overdue.

We need a system to regulate nonresident sheep harvests, which is best done by limiting them to draw permits only and capping the allowable harvests, both to protect our sheep resource and to give residents their constitutional hunting priority to that limited resource.

**Proposal 63 – 5AAC 92.085 Unlawful methods of taking big game; exceptions.**

*Remove the restriction on the use of aircraft for spotting Dall sheep in the Interior/Northeast Arctic Region.*

**SUPPORT**

Our support of this proposal is not intended as support for the aerial spotting of individual sheep with intent to harvest. Our support of this proposal is grounded in the rationale that no new regulation should be passed based on subverting the public process of wildlife management that we all hold dear, whether the public agrees with that regulation or not.

That is what happened in passing this new regulation.

The Board of Game by majority vote introduced this as a board-generated proposal at a work session meeting. It had never before been proposed by the public. There was no urgency in considering this issue, and the processes to bring this issue to the board’s attention were more than sufficient. Those are two of the four criteria for Board-generated proposals the Board overtly contravened when generating the original Proposal 207.
Based on this new regulation, the Big Game Commercial Services Board that oversees guides recently reworded their ethics regulations that govern how aircraft may be used, removing language that specifically mentioned “aerial spotting” and rewording it similar to the already existing federal law governing the harassment of wildlife with aircraft and motorized vehicles.

The Board might consider similar language tweaks.

**Proposal 82** – 5 AAC 85.055 Hunting seasons and bag limits for Dall sheep.

**Change the nonresident sheep season in Unit 19C to a drawing permit hunt with up to 80 permits.**

**OPPOSE**

The sheep hunting issues and problems in Unit 19C outlined by the proponent of this proposal are exactly why it would be a bad idea to codify by regulation that nonresident guided sheep hunters in Unit 19C be continually afforded the same opportunity they have now under a general hunt.

All that would do is allow the same thing to keep on happening, when what needs to happen is a reduction of nonresident sheep hunting opportunity. Nonresident guided sheep hunters outnumber residents in Unit 19C, just as this proposal states, and they harvest the vast majority of the sheep each season. Residents are denied access due to agreements guides have with some transporters, and strips are effectively locked up as well. In every way, Unit 19C is the prime example of a sheep allocation policy by the Board of Game that is completely unfair to resident sheep hunters and resident opportunity, and can lead to resource concerns that cause restrictive drawing hunts for all.

What is happening in Unit 19C is a prime example of why the Board continually sees proposals from residents seeking to limit nonresident sheep hunters. Nonresident sheep hunters definitely need to go on a draw-permit system, but the number of permits should reflect a steep reduction in the numbers of nonresident sheep hunters we have now under a general hunt.

**Proposal 83** – 5AAC 85.025 Hunting seasons and bag limits for caribou.

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

**OPPOSE**
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 guided nonresidents, and a light harvest by those nonresident hunters is acceptable because “most 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 (#51) 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 until the harvest or population objectives are reached. This proposal is a good example of why we submitted Proposal 51.

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.

Proposal 97 – 5AAC 92.069 Special provisions for moose drawing permit hunts.

Remove the nonresident guide requirement for moose hunts in the Interior/Northeast Arctic Region, and change the permit allocation.

SUPPORT

The Board of Game has deemed they have the authority to add new species to Alaska’s “must-be-guided” law (AS 16.05.407), adding moose to the statute as a must-be-guided species in certain parts of the interior.

This “must-be-guided” creep – addition of moose to the must-be-guided law – benefits guides at the expense of resident hunters. Requiring nonresidents
to be guided for moose in a portion of Unit 21B within the Nowitna National Wildlife Refuge where a guide has exclusive guiding privileges, then essentially allocating to that individual guide a guaranteed client base, came at the expense of resident opportunity and access.

Here is the background that led to this particular Board of Game decision to require nonresidents be guided for moose on the Upper Nowitna and to limit resident moose hunters to 50% of the permits, quoted from the Department of Fish & Game’s Analysis & Recommendations:

“For specific moose drawing permits, the Board of Game allocated portions of the nonresident permits to hunters who would be required to use a guide. Proposals requesting this allocation did so in areas where it had become difficult for a guide’s clients to draw a permit. Additionally, proponents of this regulation argued that these changes also meant that more meat from the harvested moose would be better cared for and remain in the local area with community members, guides, or assistant guides.”

Let’s be clear here. When it was difficult for this guide’s clients to draw a permit, the application was completely open to both residents and nonresidents equally. Everyone had a chance to draw, but more residents put in than nonresidents and this negatively affected this guide’s client base. Summing up that argument, “I as a guide want more guaranteed clients!”

This other rationale the Department mentions, the notion that guides take better care of meat than resident moose hunters, is completely false and offensive, and the premise that more meat would remain in the local area with guides and assistant guides if we allow nonresident guided hunters half of the permit allocation is just a reallocation to “locals” over “nonlocals” that we too often see in the federal arena. Won’t those local guides and assistant guides still hunt for their own moose if they didn’t have a guaranteed subsidy and nonresident client base? And isn’t what is going on essentially proxy hunting by nonresident guided hunters who have no intention of bringing the meat home with them? Yet our state laws say that if one is proxy hunting, he can’t keep the antlers, can’t keep the “trophy value.”

The DM 809/810/811 draw permit hunt allocates 10 permits to residents (DM 810), 7 permits to nonresident must-be-guided (DM 811), and 3 permits to nonresident unguided (DM 809). This hunt allows a moose hunter to keep the antlers without having to destroy the “trophy value.”

In 2016, 59 residents applied for the 10 available DM 810 permits, with a 17% draw percentage. 10 nonresidents applied for the 7 DM 811 must-be-guided permits with a 70% chance of drawing. 14 nonresidents applied for the 3 DM 809 permits with a 21% chance of drawing.
Some argue that this is a “trophy hunt” and thus nonresident hunters should have an equal allocation with resident hunters. It doesn’t matter how a hunt is defined, no moose hunt anywhere in the state where both residents and nonresidents are restricted should allow a permit allocation to nonresidents higher than 10%.

**Proposal 105 – 5AAC 85.025 Hunting seasons and bag limits for caribou.**

**Change the nonresident bag limit for caribou and resident cow season in Unit 26B**

**SUPPORT**

Between May of 2016, when RHAK submitted this proposal, and January of 2017, the Alaska Department of Fish & Game published new data showing the Central Arctic Caribou herd had substantially declined to 22,630 animals, which is below the Intensive Management population objective of 28,000 – 32,000. Due to this decline, the Department has amended our proposal for even more restrictions than we originally proposed due to conservation concerns with the CAH.

From the Department’s Analysis & Recommendations:

“When this proposal was submitted, the Central Arctic caribou herd (CAH) was estimated at 50,753 caribou (range: 40,924–60,582) in 2013 and the herd was determined to be either stable or slightly declining with an annual harvest rate of 2–4%. However, the July 2016 photocensus resulted in a population estimate of 22,630 caribou (range: 20,074–25,186), indicating a substantial decline in the herd.

Harvest by Nonresidents: During RY10–RY15, nonresident harvest comprised an average of 31% of the harvest (293 caribou). This composition changed over time from 22% during RY10–RY12 to 41% during RY13–RY15. The average number of hunters was also higher during RY13–RY15 (429 nonresident hunters) compared to RY10–RY12 (315 nonresident hunters). Approximately 100 more nonresident hunters were in field during RY13–RY15 compared to RY10–RY12. The increase in nonresident hunters was likely due to decreased opportunities for nonresidents in the Western Arctic and Teshekpuk caribou herds. Most nonresident harvest occurs in August (77%) with 18% occurring in September and the remaining 5% throughout the year.”

The Department recommends the following amendments to our proposal:

**Unit 26B, that portion north of 69°30’ N. Lat. and west of the east bank of the Kuparuk River to a point at 70°10’ N. Lat., 149°04’ W. Long., then west about 22 miles to 70°10’ N. Lat., 149°56’ W. Long., then following the east bank of the Kalubik River to the Arctic Ocean):**
**Resident hunters:** 5 caribou total, July 1–June 30, however, no more than 3 cows may be taken (projected harvest of 60 bulls, 15 cows).

**Nonresident hunters:** One bull by harvest ticket, August 25–September 7 (projected harvest of ≤5 bulls).

**Unit 26B Remainder:**

**Resident hunters:** 2 caribou by harvest ticket, August 1- April 30; however, cow caribou may only be taken November 1- April 30 (projected harvest of 320 bulls, 50 cows)

**Nonresident hunters:** One bull by harvest ticket, August 25 -September 7 (projected harvest of 130 bulls)

With the CAH now below the IM population objective, and the Department saying we need to reduce harvest by 200-300 caribou, we believe there should be no nonresident hunting allowed at this time.

We recommend keeping the modified resident season and bag limits above, but having no open season for nonresident hunters until the minimum IM population objective is reached.

**Proposal 106 – 5AAC 85.020 Hunting seasons and bag limits for brown bear**

**Add a new resident only registration permit hunt for grizzly bear within the Dalton Highway Corridor Management Area (DHCMA)**

**Unit 26B Resident only**

**RB XXX – one bear every regulatory year by permit within the DHCMA by bow and arrow only, Aug 10 -Aug 24**

**SUPPORT**

The current grizzly bear season on the north slope in Unit 26B under the RB 988 registration permit opens on August 25th for residents. We would like to see more grizzly bear opportunity for bowhunters who hunt caribou within the DHCMA earlier in August. The likely harvest rates would be extremely low and we don’t believe those harvests would impact the RB 988 resident opportunities or the DB 987 nonresident opportunities later in the season.

Alternatively, the Board could create a resident-only draw permit with limited allocation for an earlier archery-only season within the DHCMA.

Thank you for the opportunity to comment.
Resident Hunters of Alaska – info@residenthuntersofalaska.org
I am curious as to why Alaska fish and game allows hunters to harass and Chase caribou with snow machines. I came from a hunt that was the most ridiculous thing I've ever experienced in all of my life and I've been hunting since childhood. Hundreds of snowmobiles chasing Caribou around jumping up and running them down. That is not hunting and should not be legal. I hiked 5 miles on foot after a band of caribou crawled on my belly with in 175 yards of a group and before I could take a shot I had a snowmobiler come flying up the mountain chase them down and shoot them from their snowmobile. This is insane and needs to be addressed before somebody is hurt or killed and it is especially unfair to an animal. If you can put in the work to get an animal you don't deserve one
Proposal 159, opposed. The onus of proper animal identification falls solely with the hunter. There are multiple resources already available to aid anyone wishing to hone skills outside the field. Adfg has built in safeguard against sub 50” kills and that is counting brow tines. If unsure of dimensions and not required brow tines, don’t shoot. Simple. I have this happen every year in 15c. I think it’s a waste of resources to build a program that is redundant and will do little to alleviate the sub legal kill #s. One cannot replace common sense and experience with a few minute on line class.
Proposal #78; Yes. Aligning the Brown/Grizzly Bear season with the units surrounding unit 19C only makes good sense. I've seen hunters struggle to identify the line between 19C & 16B in the Mystic Pass area & enforcement trying to catch someone over the line. Aligning these seasons would solve all these problems.

Proposal #82; No. Drawing permits make things much more complicated for both the nonresidents and the guides & I'm not sure this issue needs such a drastic measure. My experience in the Alaska Range with both residents and guides doesn't show me any big problems between the two, actualy the guides I work with are very profesional with the residents I work with. However the residents do seem to have less success rate, I think for various reasons. I'm not sure this proposal will help this.
IN REPLY REFER TO:
OSM 16112.PM

JAN 19 2017

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 (Board) is scheduled to meet February 17-25, 2017 to deliberate proposals concerning changes to regulations governing hunting and trapping of wildlife for the Interior and Northeast Arctic Regions. We have reviewed the 108 proposals the Board will be considering at this meeting.

The Office of Subsistence Management, working with other Federal agencies, has developed preliminary recommendations on those proposals that have potential impacts on both Federally qualified 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

cc: Anthony 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, Special Assistant to the Commissioner, Alaska Department of Fish and Game
    Interagency Staff Committee
    Administrative Record
RECOMMENDATIONS

ALASKA BOARD OF GAME PROPOSALS

Interior/Northeast Arctic Region

February 17-25, 2017

Fairbanks, Alaska

Office of Subsistence Management (OSM)
PROPOSAL 46 – 5 AAC 92.015(a)(4). Brown bear tag fee exemptions. Reauthorize resident brown bear tag fee exemptions for the Interior/Northeast Arctic Region.

Current Federal Regulations:

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

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

Is a similar issue being addressed by the Federal Subsistence Board? 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 will continue the tag fee exemption, which eliminates the requirement that Federally qualified subsistence users 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 cash economies are in a depressed state.

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).

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board (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. 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. The U.S. Fish and Wildlife Service recently changed their regulations regarding salvaging of meat in response to incidents of perceived waste of meat for some species. 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 recommendation is to oppose this proposal.

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

PROPOSAL 68 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Change the “any bull” or “one bull” bag limits to “any antlered bull” for all moose hunts in the Interior/Northeast Arctic Region.

Current Federal Regulation:

Unit 12 – Moose

Unit 12—that portion within the Tetlin National Wildlife Refuge and those lands within the Wrangell-St. Elias National Preserve north and east of a line formed by the Pickerel Lake Winter Trail from the Canadian border to Pickerel Lake—1 antlered bull by Federal registration permit Aug. 24-Sept. 20.

Nov. 1-Feb. 28.

Unit 12—that portion east of the Nabesna River and Nabesna Glacier, and south of the Winter Trail running southeast from Pickerel Lake to the Canadian border—1 antlered bull Aug. 24-Sept. 30.

Unit 12, remainder—1 antlered bull by joint Federal/State registration permit only Aug. 20-Sept. 20.
Unit 19 – Moose

Unit 19—Residents of Lime Village only—no individual harvest limit, but a village harvest quota of 28 bulls (including those taken under the State permits). Reporting will be by a community reporting system. July 1-June 30.

Unit 19A—North of the Kuskokwim River, upstream from but excluding the George River drainage, and south of the Kuskokwim River upstream from and including the Downey Creek drainage, not including the Lime Village Management Area; Federal public lands are closed to the taking of moose. No open season.

Unit 19A, remainder—1 antlered bull by Federal drawing permit or a State permit. Federal public lands are closed to the taking of moose except by residents of Tuluksak, Lower Kalskag, Upper Kalskag, Aniak, Chuathbaluk, and Crooked Creek hunting under these regulations. The Refuge Manager of the Yukon Delta NWR, in cooperation with the BLM Field Office Manager, will annually establish the harvest quota and number of permits to be issued in coordination with the State Tier I hunt. If the allowable harvest level is reached before the regular season closing date, the Refuge Manager, in consultation with the BLM Field Office Manager, will announce an early closure of Federal public lands to all moose hunting. Sept. 1-20.

Unit 19B—1 bull with spike-fork or 50-inch antlers or antlers with 4 or more brow tines on one side. Sept. 1-20.

Unit 19C—1 antlered bull. Sept. 1-20.

Unit 19C—1 bull by State registration permit. Jan. 15-Feb. 15.

Unit 19D—that portion of the Upper Kuskokwim Controlled Use Area within the North Fork drainage upstream from the confluence of the South Fork to the mouth of the Swift Fork—1 antlered bull. Sept. 1-30.


Unit 20 – Moose
Unit 20A—1 antlered bull

Unit 20B—that portion within the Minto Flats Management Area—1 bull by Federal registration permit only

Unit 20B, remainder—1 antlered bull

Unit 20C—that portion within Denali National Park and Preserve west of the Toklat River, excluding lands within Mount McKinley National Park as it existed prior to December 2, 1980—1 antlered bull; however, white-phased or partial albino (more than 50 percent white) moose may not be taken

Unit 20C, remainder—1 antlered bull; however, white-phased or partial albino (more than 50 percent white) moose may not be taken

Unit 20E—that portion within Yukon-Charley Rivers National Preserve—1 bull

Unit 20E—that portion drained by the Middle Fork of the Fortymile River upstream from and including the Joseph Creek drainage—1 bull

Unit 20E, remainder—1 bull by joint Federal/State registration permit

Unit 20F—that portion within the Dalton Highway Corridor Management Area—1 antlered bull by Federal registration permit only

Unit 20F, remainder—1 antlered bull

Unit 21 – Moose

Unit 21B—that portion within the Nowitna National Wildlife Refuge downstream from and including the Little Mud River drainage—1 bull. A State registration permit is required from Sep. 5-25. A Federal registration permit is required from Sep. 26-Oct. 1

Unit 21B—that portion within the Nowitna National Wildlife Refuge downstream from and including the Little Mud River drainage—1 antlered bull. A Federal registration permit is required during the 5-day season and will be limited to one per household

Unit 21A and 21B, remainder—1 bull

Unit 21B—that portion within the Nowitna National Wildlife Refuge downstream from and including the Little Mud River drainage—1 antlered bull. A Federal registration permit is required during the 5-day season and will be limited to one per household

Five-day season to be announced between Dec. 1 and Mar. 31.

Unit 21A and 21B, remainder—1 bull

Aug. 20-Sept. 25.
Unit 21C—1 antlered bull

Unit 21D—Koyukuk Controlled Use Area—1 bull; 1 antlerless moose by Federal permit if authorized by announcement by the Koyukuk/Nowitna NWR manager. Harvest of cow moose accompanied by calves is prohibited. A harvestable surplus of cows will be determined for a quota or
1 antlered bull by Federal permit, if there is no Mar. 1-5 season and if authorized by announcement by the Koyukuk/Nowitna NWR manager and BLM Central Yukon field office manager. A harvestable surplus of bulls will be determined for a quota. Announcement for the March and April seasons and harvest quotas will be made after consultation with the ADF&G area biologist and the Chairs of the Western Interior Regional Advisory Council and Middle Yukon and Koyukuk River Fish and Game Advisory Committee

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

Unit 21E—1 moose; however, only bulls may be taken from Aug. 25-Sep. 30

During the Feb. 15-Mar. 15 season, a Federal registration permit is required. The permit conditions and any needed closures for the winter season will be announced by the Innoko NWR manager after consultation with the ADF&G area biologist and the Chairs of the Western Interior Regional Advisory Council and the Middle Yukon Fish and Game Advisory Committee as stipulated in a letter of delegation. Moose may not be taken within one-half mile of the Innoko or Yukon River during the winter season

Unit 24 — Moose

Unit 24A—1 antlered bull by Federal registration permit
Unit 24B—that portion within the John River Drainage—1 moose

Unit 24B, remainder—1 antlered bull by Federal registration permit
Dec. 15-Apr. 15.

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

Units 24C and 24D—that portion within the Koyukuk Controlled Use Area
and Koyukuk National Wildlife Refuge—1 bull
Sept. 1-25.

1 antlerless moose by Federal permit if authorized by announcement by the
Koyukuk/Nowitna National Wildlife Refuge Manager and BLM Field Office
Manager Central Yukon Field Office. Harvest of cow moose accompanied by
calves is prohibited. A harvestable surplus of cows will be determined for a
quota
or
1 antlered bull by Federal permit, if there is no Mar. 1-5 season and if
authorized by announcement by the Koyukuk/Nowitna National Wildlife
Refuge Manager and BLM Field Office Manager Central Yukon Field
Office. Harvest of cow moose accompanied by calves is prohibited.
Announcement for the March and April seasons and harvest quotas will be
made after consultation with the ADF&G Area Biologist and the Chairs of
the Western Interior Alaska Subsistence Regional Advisory Council, and the
Middle Yukon and Koyukuk River Fish and Game Advisory Committees
Mar. 1-5 to be announced.

or
Apr. 10-15 to be announced.

Unit 24C, remainder and Unit 24D, remainder—1 antlered bull. During the
Sep. 5-25 season, a State registration permit is required
Aug. 25-Oct. 1

Unit 25 – Moose

Unit 25A—1 antlered bull
Aug. 25-Sept. 25.
Dec. 1-10.

Unit 25B—that portion within Yukon-Charley National Preserve—1 bull
Aug. 20-Sept. 30.

Unit 25B—that portion within the Porcupine River drainage upstream from,
but excluding the Coleen River drainage—1 antlered bull
Dec. 1-10.

Unit 25B—that portion, other than Yukon-Charley Rivers National Preserve,
Sept. 5-30.
draining into the north bank of the Yukon River upstream from and including the Kandik River drainage, including the islands in the Yukon River—1 antlered bull

**Unit 25B, remainder—1 antlered bull**

Aug. 25-Sept. 25.

**Unit 25C—1 antlered bull**

Aug. 20-Sept. 30.

**Unit 25D (west)—that portion lying west of a line extending from the Unit 25D boundary on Preacher Creek, then downstream along Preacher Creek, Birch Creek, and Lower Mouth of Birch Creek to the Yukon River, then downstream along the north bank of the Yukon River (including islands) to the confluence of the Hadweenzic River, then upstream along the west bank of the Hadweenzic River to the confluence of Forty and One-Half Mile Creek, then upstream along Forty and One-Half Mile Creek to Nelson Mountain on the Unit 25D boundary—1 bull by a Federal registration permit. Permits will be available in the following villages: Beaver (25 permits), Birch Creek (10 permits), and Stevens Village (25 permits). Permits for residents of 25D (west) who do not live in one of the three villages will be available by contacting the Yukon Flats National Wildlife Refuge Office in Fairbanks or a local Refuge Information Technician. Moose hunting on public land in Unit 25D (west) is closed at all times except for residents of Unit 25D (west) hunting under these regulations. The moose season will be closed by announcement of the Refuge Manager Yukon Flats NWR when 60 moose have been harvested in the entirety (from Federal and non-Federal lands) of Unit 25D (west)

Aug. 25-Feb. 28.

**Unit 25D, remainder—1 antlered moose**


**Units 26B and 26C – Moose**

**Unit 26B—excluding the Canning River drainage—1 bull**

Sept. 1-14.

**Units 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.

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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:** While many units across the Interior region have fall moose hunts that could be clarified as “any antlered bull” (i.e. most of Unit 20 and Unit 21), several units have winter hunts that would essentially be nullified (i.e. February hunts in Units 19C and 25D) by adoption of this proposal. There are no conservation concerns associated with this proposal. Although this proposal aims to prevent harvest of calves, mortality is usually highest during the first year of life and therefore, much of this mortality is likely to be compensatory in nature. Changing to “any antlered bull” may prevent accidental harvest of cows but the degree to which this has occurred in the past would have to be examined on a unit by unit basis to determine whether such a restriction is warranted.

This proposal would decrease opportunity for Federally qualified subsistence users in those units with winter hunts.

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

**Rationale:** Although “any antlered bull” regulations may be biologically justified in some cases, there do not appear to be any biological concerns for moose in the Units covered by this proposal. In addition, this proposal would result in decreased hunting opportunity for Federally qualified subsistence users during winter hunts.

**PROPOSAL 76 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Lengthen the hunting season for moose in Unit 21E.

**Current Federal Regulation:**

**Unit 21E – Moose**

*Unit 21E—1 moose; however, only bulls may be taken from Aug. 25-Sep. 30 Aug. 25-Sept. 30. Feb. 15-Mar. 15.***

*During the Feb. 15-Mar. 15 season, a Federal registration permit is required. The permit conditions and any needed closures for the winter season will be announced by the Innoko NWR manager after consultation with the ADF&G area biologist and the Chairs of the Western Interior Regional Advisory Council and the Middle Yukon Fish and Game Advisory Committee as stipulated in a letter of delegation. Moose may not be taken within one-half mile of the Innoko or Yukon River during the winter season.*

**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 hunting opportunity for Federally qualified subsistence users by allowing them to hunt on both State and Federal administered lands from Sept. 1-5. It would also eliminate the burden of determining land status during this time period, which is difficult due to the checkerboard land ownership pattern in Unit 21E.

There are no conservation concerns for this proposal as the bull:cow ratio in this unit is high and harvest has historically been well below management objectives.

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

Rationale: This proposal will increase hunting opportunity for Federally qualified subsistence users and is not expected to result in any conservation concerns.

PROPOSAL 84 – 5 AAC 84.270. Furbearer trapping. Lengthen the trapping season for wolf in Units 12 and 20E.

Current Federal Regulation:

Unit 12 – Trapping – Wolf

No Limit

Oct. 1-Apr. 30

Unit 20 – Trapping – Wolf

Unit 20E – No limit

Oct. 1-Apr. 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: Adoption of this proposal would align State and Federal regulations, which would decrease regulatory complexity, user confusion, and law enforcement concerns. This proposal would decrease regulatory complexity for Federally qualified subsistence users who also trap under State regulations.

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

Rationale for comment: This proposal would decrease regulatory complexity by aligning State and Federal regulations.

PROPOSAL 85 – 5 AAC 85.025. Hunting seasons and bag limits for caribou. Open a resident drawing hunt for caribou in Unit 20E.
Current Federal Regulation:

Unit 20E – Caribou

Unit 20E—1 caribou; A joint State/Federal registration permit is required. During the Aug. 10-Sep. 30 season, the harvest is restricted to 1 bull. The harvest quota for the period Aug. 10-29 in Units 20E, 20F, and 25C is 100 caribou. During the Nov. 1-Mar. 31 season, area closures or hunt restrictions may be announced when Nelchina caribou are present in a mix of more than 1 Nelchina caribou to 15 Fortymile caribou, except when the number of caribou present is low enough that fewer than 50 Nelchina caribou will be harvested regardless of the mixing ratio for the two herds.

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 allow the take of any caribou during September and would move the start date of the winter season to Oct. 21. It is unclear whether residents would be able to obtain both a drawing and registration permit in order to harvest two caribou or whether the intent is simply to allow harvest of cows in September and to extend the winter season. However, as State seasons are generally closed early due to quotas being met, it seems unlikely that harvest of additional caribou would occur.

This proposal targets the Nelchina caribou herd (NCH), which currently exceeds management objectives. While 60-95% of the NCH winters in southern Unit 20E, Nelchina caribou generally spend the rut in Unit 13. Overgrazing of winter range in southern Unit 20E is increasingly becoming a conservation concern.

This proposal would have minimal effects on Federally qualified subsistence users. Federally qualified subsistence users could apply for drawing permits, which could increase their opportunity. However, the drawing permit may attract additional users to the area, increasing competition, particularly in November when there is currently an open Federal season but not a State season.

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

Rationale: As the NCH exceeds management objectives and may be causing range degradation, OSM supports increasing harvest of this herd. However, Nelchina caribou are not usually present in southern Unit 20E during September. Additionally, as State quotas are generally met, expanding seasons and harvest limits may not be warranted.

PROPOSAL 91 – 5 AAC 85.065. Hunting seasons and bag limits for small game. Modify the hunting season and bag limits for grouse in Unit 12.
Current Federal Regulation:

Unit 12 – Grouse (Spruce, Ruffed, and Sharp-tailed)

15 per day, 30 in possession Aug. 10-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 would decrease opportunity for Federally qualified subsistence users and would increase regulatory complexity by misaligning State and Federal regulations.

Harvest of grouse may decrease if this proposal is approved. However, while data on grouse populations and harvest in Unit 12 is limited, the 2016 small game survey indicated that grouse populations across Interior Alaska are stable or increasing.

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

Rationale: This proposal decreases opportunity and increases regulatory complexity. There does not seem to be a conservation concern for grouse in this area.

PROPOSAL 94 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Modify the hunting season for moose in Unit 21D.

Current Federal Regulation:

Unit 21D – Moose

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

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 regulatory complexity by misaligning State and Federal moose seasons in Unit 21D. The issuance of a Federal permit may also be required during the August season, increasing the regulatory burden on Federally qualified subsistence users.

This proposal would increase harvest opportunity for Federally qualified subsistence users by enabling them to hunt Sept. 1-5 and Sept. 26-30 under State regulations and Aug. 22-31 under Federal regulations. However, Federally qualified subsistence users would be limited to Federal public lands during August, which are difficult to distinguish given the checkerboard land ownership in Unit 21D remainder.

This proposal would likely increase moose harvest as >50% of harvest in Unit 21D generally occurs between 9/15 and 9/25. Additionally, as the end of September approaches the peak of the rut, bull moose are much more responsive to calling, making them more susceptible to harvest. Hunters returning from hunting in the Koyukuk CUA (season closes Sept. 25) may also utilize the extended season in Unit 21D remainder, further increasing moose harvest in this hunt area.

The moose population around the confluence of the Koyukuk and Yukon rivers has a low bull:cow ratio. Given the State season is bulls-only, an increase in bull harvest in this area would further depress the bull:cow ratio. The moose population in the Kaiyuh Slough area is at low density and very susceptible to increases in harvest. Harvest during the rut may disrupt breeding, which could impede growth of the moose population.

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

**Rationale:** The moose population in Unit 21D remainder cannot withstand an increase in harvest. Additionally, this proposal increases regulatory complexity for Federally qualified subsistence users.

**PROPOSAL 103 – 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.

**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.
  - Cows may be harvested Feb. 1-June 30.
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  

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  

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  

Feb. 1-June 30.  

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  

Dec. 6-June 30.  

14
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.

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
Dec. 10-June 30.

Cows may be harvested
July 1-Apr. 30.

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, the data provided by this proposal would be extremely useful in tracking harvest of the WACH and 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.

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. Last year, the State changed regulations to reduce harvest limits for nonresidents in response to the decline of the WAC and TCH as well as sweeping changes across the range of both herds for
residents. 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 104 - 5 AAC 85.025(15). Hunting seasons and bag limits for caribou.** Expand the bag limits for caribou in Units 24A, 25A, 25D, 26B and 26C.

**Current Federal Regulations**

**Unit 24—Caribou**

**Unit 24A**—that portion south of the south bank of the Kanuti River—1 caribou

Aug. 10 - Mar. 31

**Unit 24B**—that portion south of the south bank of the Kanuti River, upstream from and including that portion of the Kanuti-Kilolitna River drainage, bounded by the southeast bank of the Kodosin-Nolitna Creek, then downstream along the east bank of the Kanuti-Kilolitna River to its confluence with the Kanuti River—1 caribou.

Aug. 10 – Mar. 31.

**Unit 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

- **Cows may be harvested**
  - Sept. 1 - Mar. 31

**Unit 25—Caribou**

**Unit 25A**—in those portions west of the east bank of the East Fork of the

July 1 - June 30.
the Chandalar River extending from its confluence with the Chandalar River upstream to Guilbeau Pass and north of the south bank of the mainstream of the Chandalar River at its confluence with the East Fork Chandalar River west (and north of the south bank) along the West Fork Chandalar River—10 caribou. However, only bulls may be taken May 16 – June 30.

**Unit 25C**—1 caribou; a joint State/Federal registration permit is required. During the Aug. 10 – Sept. 30 season the harvest is restricted to 1 bull. The harvest quota between Aug. 10 - 29 in Units 20E, 20F, and 25C is 100 caribou.

**Unit 25D**—that portion drained by the west fork of the Dall River west of 150°W. Long.—1 bull

**Units 25A remainder, 25B, and 25D remainder**—10 caribou

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**Unit 26**—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—40- 5 caribou per day as follows:

However, calves may not be taken

Bulls may be harvested

July 1 - Oct. 14
Dec. 6 - June 30

Cows may be harvested

However, cows accompanied by calves may not be taken July 15-Oct. 15.

**Unit 26A remainder**—Up to 5 caribou per day.

However, calves may not be taken

Bulls may be harvested

July 1 - Oct. 15
Dec. 6 - June 30

Up to 3 cows per day may be harvested

However, cows accompanied by calves may not be taken July 16-Oct. 15
**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

- **Cows may be harvested**
  - July 1 – Apr. 30

**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

**Unit 26C**—10 caribou per day

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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:** The proposed changes were recommended to align the Central Arctic Herd (CAH) seasons and bag limits within the herd’s range. In some cases the changes proposed by ADF&G result in additional hunting opportunities and other cases reduce the hunting opportunities for Federally qualified subsistence users. Most of the recommended changes allow for more harvest from the CAH and the Porcupine Caribou Herd (PCH), two populations which are currently doing well. There are also a few changes which provide additional protection for cow caribou.

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

**Rationale for comment:** The proposed changes are appropriate given what is known about the seasonal movements and distribution of the CAH and PCH. If this proposal is adopted, Federal and State regulations would be misaligned and create confusion for hunters if similar changes were not made to Federal subsistence regulations. A great deal of effort was made to align the current Federal (2016-2018) and State (2016-2017) caribou regulations as much as possible. Additional time to evaluate the effects on caribou harvest from the current Federal and State regulations would be useful before making additional changes.

**PROPOSAL 109 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.** Lengthen the brown bear hunting seasons in Units 25 and 26.
Current Federal Regulation:

Unit 25 – Brown Bear


Unit 25D—2 bears every regulatory year July 1-June 30.

Unit 26B and 26C – Brown Bear

Unit 26B—1 bear Jan. 1-Dec. 31.

Unit 26C—1 bear Aug. 10-June 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: Changing the opening date of the State brown bear season to Aug. 1 in Units 25A, 25B, and 26C would increase regulatory complexity by misaligning State and Federal seasons. However, the requested change would provide 10 additional days of hunting opportunity in these subunits.

In Unit 25D, the State resident season is currently open Mar. 1-Nov. 30. Changing the Unit 25D season to Aug. 1-June 30 would eliminate the July season, decreasing opportunity. While the requested change would allow harvest from Dec. 1-Feb. 28 in Unit 25D, more bears are expected to be harvested in the summer than during winter hibernation. Additionally, the brown bear population in Unit 25D may be increasing while moose density remains low. Increasing bear harvest to reduce moose predation is a strategy identified in the Yukon Flats Cooperative Moose Management Plan.

Between 2003 and 2013, reported brown bear harvest in Unit 25A was undersubscribed (48 bears is the allowable harvest while reported harvest ranged from 21-31 bears). During the same time period, reported harvest in Units 25B and 25D was vastly undersubscribed (47 bears is the allowable harvest while reported harvest ranged from 1-6 bears). During the same time period, reported harvest in Unit 26C was undersubscribed in all years, except 2013 when harvest equaled allowable harvest (31 bears is the allowable harvest while reported harvest ranged from 6-31 bears). In Unit 26B, brown bear harvest has been close to or exceeded the allowable harvestable limit of 21 bears since 2008 (range 18-28 bears between 2008 and 2013).

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

Rationale: The differing harvest levels in these units demonstrate that aligning regulations may not be appropriate. While harvest in Units 25D and 25B could be increased substantially, harvest in Units 26B and 26C should not. Additionally, this proposal would eliminate the July season in Unit 25D, decreasing
opportunity and potentially bear harvest in a unit where harvest is already low. This proposal also misaligns several State and Federal seasons, increasing regulatory complexity.

**PROPOSAL 110 – 5 AAC 85.015. Hunting seasons and bag limits for black bear.** Increase the bag limit for black bear in Unit 25B.

**Current Federal Regulation:**

**Unit 25 – Black Bear**

- Unit 25B—3 bears
- Or 3 bears by State community harvest permit

**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 are currently no black bear density estimates available for Unit 25B. Federally qualified subsistence users are currently limited to 3 black bears per year and have the option of participating in a community harvest program. Local users have yet to fully utilize community harvest permits for this species. Black bears are not required to be sealed in Units 25D and 25B, so it is uncertain how many black bears are currently being taken in this area. Increasing the black bear limit to 5 bears would provide more opportunity to Federally qualified subsistence users. Adoption of this proposal would result in misalignment of State and Federal regulations, which will increase regulatory complexity, user confusion, and law enforcement concerns.

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

**Rationale for comment:** Although increasing the limit to 5 black bears in Unit 25B would provide increased opportunity to Federally qualified subsistence users, there are currently no data pertaining to black bear density and population levels in this Unit. Population uncertainties associated with this proposal should be considered before it is adopted.

**PROPOSAL 114 – 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

**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$^2$ to 386 mi$^2$. 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 likely considerable underreporting, the reported wolverine harvests from 2009-2012 indicate that the hunting and trapping harvest is sustainable for Unit 26.

**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 and could therefore adversely impact the population. 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 115 – 5 AAC 84.270. Furbearer trapping.** Lengthen the trapping season for lynx in Unit 25.

**Current Federal Regulation:**

**Trapping**

**Unit 25 — Lynx**

*Lynx—No limit. Nov. 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 would reduce regulatory complexity by aligning State and Federal lynx seasons. It would also align State and Federal wolverine trapping seasons in Units 25A, 25B, and 25D with State and Federal lynx trapping seasons in these subunits. Therefore,
incidental take of lynx in March in Units 25A, 25B and 25D when targeting wolverine would be legal. As lynx are primarily regulated by prey abundance, not harvest, no negative consequences to the lynx population are anticipated.

One concern is the incidental harvest of wolverine in Unit 25C, resulting from the extended lynx season. The State wolverine trapping season in Unit 25C has historically been a month shorter than the wolverine trapping season in the remainder of Unit 25 due to this subunit’s road accessibility and proximity to Fairbanks, which results in greater trapping pressure. As the lynx season is already 15 days longer than the wolverine trapping season in Unit 25C, incidental take may already be occurring. However, as incidental take is rarely reported, it is difficult to determine how much of a conservation concern this is.

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

**Rationale:** OSM supports extending the lynx trapping season in Units 25A, 25B, and 25D to reduce regulatory complexity, legalize incidental take of lynx in March, and because there are no conservation concerns. However, there is concern associated with extending the lynx trapping season in Unit 25C due to possible conservation concerns for wolverines in this subunit.

**PROPOSAL 143 – 5 AAC 85.045(1). Hunting seasons and bag limits for moose.** Reauthorize the antlerless moose hunting seasons in Unit 1C.

**Current Federal Regulations:**

**Unit 1C – Moose**

\[
\begin{align*}
\text{Unit 1C} & - \text{that portion south of Point Hobart including all Port} & \text{Sept. 15 – Oct. 15} \\
\text{Houghton drainages} & - 1 \text{ bull with} & \text{or} 3 \text{ or more brow tines on one side, or antlers with 2 brow tines} \\
\text{or 50-inch antlers} & \text{on both sides, by State registration permit only} & \\
\text{Unit 1C, remainder, excluding drainages of Berners Bay} & 1 \text{ bull} & \text{Sept. 15 – Oct. 15} \\
& \text{by State registration permit only} & \\
\text{Unit 1C, Berners Bay} & \text{No open season} & 
\end{align*}
\]

**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 provide management flexibility.

PROPOSAL 144 – 5 AAC 85.045(3). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose hunting season in Unit 5A, the Nunatak Bench hunt.

Current Federal Regulations:

Unit 5 – Moose

Unit 5A – Nunatak Bench – 1 moose by State registration permit only. Nov. 15 – Feb. 15
The season will be closed when 5 moose have been taken from the Nunatak Bench

See comments for proposal #143.

PROPOSAL 145 – 5 AAC 085.045(4). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose hunting season in Unit 6C.

Current Federal Regulations:

Unit 6 – Moose

Unit 6C—1 antlerless moose by Federal drawing permit only Sept. 1 – Oct. 31
Permits for the portion of the antlerless moose quota not harvested in the Sep. 1-Oct. 31 hunt may be available for redistribution for a Nov. 1-Dec. 31 hunt

Unit 6C—1 bull by Federal drawing permit only Sept. 1 – Dec. 31
In Unit 6C, only one moose permit may be issued per household. A household receiving a State permit for Unit 6C moose may not receive a Federal permit. The annual harvest quota will be announced by the U.S. Forest Service, Cordova Office, in consultation with ADF&G. The Federal harvest allocation will be 100% of the antlerless moose permits and 75% of the bull permits. Federal public lands are closed to the harvest of moose except by Federally qualified users with a Federal permit for Unit 6C moose, Nov. 1-Dec. 31
See comments for proposal #143.

**PROPOSAL 146 - 5 AAC 85.045(5). Hunting seasons and bag limits for moose.** Reauthorize the antlerless moose hunting season in the Twentymile/Portage/Placer hunt areas in Units 7 and 14C.

**Current Federal Regulations:**

**Unit 7—Moose**

*Unit 7 – that portion draining into Kings Bay* 

No open season

*Federal Public lands are closed to the taking of moose except by residents of Chenega Bay and Tatitlek.*

*Unit 7 remainder* 

Aug. 10 – Sept. 20

1 antlered bull with spike-fork or 50-inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only.

**Unit 14—Moose** 

No Federal open season

See comments for proposal #143.

**PROPOSAL 147 - 5 AAC 85.045(11). Hunting seasons and bag limits for moose.** Reauthorize the antlerless moose hunting season in Unit 13.

**Current Federal Regulations:**

**Unit 13 – Moose**

*Unit 13E – 1 antlered bull moose by Federal registration permit only;* Aug. 1 – Sept. 20

only 1 permit will be issued per household

*Unit 13 remainder – 2 bulls by Federal registration permit only* Aug. 1 – Sept. 30
PROPOSAL 148 - 5 AAC 85.045(13). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose hunting season on Kalgin Island in Unit 15B.

Current Federal Regulations:

Unit 15A remainder, 15B, 15C—Moose

Unit 15A—Skilak Loop Wildlife Management Area No open season

Unit 15A—remainder, 15B, and 15C—1 antlered bull with spike-fork or 50-inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only. Aug. 10–Sept. 20

Units 15B and 15C—1 antlered bull with spike-fork or 50-inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only. The Kenai NWR Refuge Manager is authorized to close the October/November season based on conservation concerns, in consultation with ADF&G and the Chair of the Southcentral Alaska Subsistence Regional Advisory Council. Oct. 20–Nov. 10

Unit 15C—1 cow by Federal registration permit only Aug. 10 – Sept. 20

See comments for Proposal 143.

PROPOSAL 149 - 5 AAC 85.045(13). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose hunting season and targeted moose season in a portion of Unit 15C.

Current Federal Regulations:

Unit 15A remainder, 15B, 15C—Moose

Unit 15A—Skilak Loop Wildlife Management Area No open season

Unit 15A—remainder, 15B, and 15C—1 antlered bull with spike-fork or 50-inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only. Aug. 10–Sept. 20

See comments for Proposal 143.
Units 15B and 15C—1 antlered bull with spike-fork or 50-inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only. The Kenai NWR Refuge Manager is authorized to close the October/November season based on conservation concerns, in consultation with ADF&G and the Chair of the Southcentral Alaska Subsistence Regional Advisory Council.

Unit 15C—1 cow by Federal registration permit only Aug. 10 – Sept. 20

See comments for Proposal 143.

PROPOSAL 150 - 5 AAC 85.045(15). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose hunting season in Unit 17A.

Current Federal Regulation:

Unit 17A – Moose

Unit 17A—1 bull by State registration permit Aug. 25-Sept. 20.

Unit 17A—up to 2 moose; one antlered bull by State registration permit, one antlerless moose by State registration permit Up to a 31-day season may be announced between Dec. 1- last day of Feb.

See comments for Proposal 143.

PROPOSAL 153 - 5 AAC 92.015. Brown bear tag fee exemption. Reauthorize resident brown bear tag fee exemptions in the Central/Southwest Region.

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: 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.
To: Alaska Board of Game  
From: Brian West  
1000 Oceanview Drive  
Anchorage, Alaska 99515

Alaska Board of Game  
2016/2017 Proposed Changes to Regulations  
Arctic/Western Alaska  
Interior/Northeast Arctic Region

Comments to Interior/Northeast Arctic Region

Proposal 49. Support. The new regulation identified specifically punishes residents. The Board has shown by passing that regulation that they are more interested in being a revenue generator for guides, many of whom are not residents, than they are in protecting the right of Alaskans as granted in our constitution. This regulation requires a resident who hunts with a non-resident family member to go on two separate hunts, one with and one without the family member, if he wants to take an animal. Who can afford that? This proposal should be adopted.

Proposal 50. Support. See comments to proposal 49.

Proposal 51. Support. Where moose and caribou populations are under stress no non-resident hunting should be allowed. Herds are to be managed for the benefit of Alaskans.

Proposal 52. Support, with changes. The cap proposed is too high, no permits should be given to non-residents. Any hunt requiring a permit means that the populations in question cannot support a general hunt. As such, since game is to be managed for Alaskans, non-residents should be given no permits. If Alaskans are being denied permits how can permits go to non-residents? Only if all Alaskans who apply for the permit receive one and there are still permits available should any go to non-residents.

Proposal 53-56. Against. These proposals could have the effect of shutting out Alaskans who do not live in a specific area.

Proposal 57. Support if amended. The cap should be zero. See comments to proposal 52.

Proposal 58. Support if amended. Again the cap should be zero. This should be simple. If permits are required only if Alaskans do not apply for a permit should any go to non-residents. Alaskan hunters must always be given priority. If guides are afraid of not making as much money they should be finding ways to make their services desirable to Alaskans instead of relying on the Board to funnel clients their way.

Proposal 60. Against. No permits for non-residents. If there is a general season then there is no need to cap non-residents.

Proposal 62. Against. See comments to proposal 60.

Proposal 64. Support if amended. The time frame should be increased to ten years and loss of trophy should be included. The penalty should be harsh enough to eliminate the so called honest mistakes.
Proposal 66. Against. There is no prohibition to using a bow during the general season. No special season is required.

Proposal 68. Support. The majority of moose hunts in Alaska have some type of antler restriction and in these hunts taking a calf in the first year of life is unlawful. This proposal basically makes taking of calves unlawful, which is a reasonable restriction.

Proposal 69. Against. There is no reason for lengthening the season. I am against all special hunts and special seasons. At some point in the future to hunt you will need to be covered by a special season, or weapon, or hunt. It is insane. Hunting is not a sport, it is a means to feed ones family. If people do not want to hunt during the general season then they should not be given special seasons.

Proposal 70. Against. Current law does not prohibit these individuals from hunting. A special season or hunt is unjustified.

Proposal 71. Against. Physical ability or lack thereof is not a justification for providing exemptions to the hunting regulations. If, as the proposer states, a person lacks the physical ability to stalk and shoot an animal, how can it be conceived that that individual can properly care the meat while in the field? This is merely a blatant attempt by a select group to gain an advantage over all others.

Proposal 72. Against.

Proposal 76. Support. This seems reasonable especially if the federal season also changes.

Proposal 77. Support. I agree with the statements made in the proposal.

Proposal 78. Support. This would also align the bear season with the caribou season in unit 19C, so early caribou hunters would be able to take a bear.

Proposal 79. Support. This would increase the take of bear helping the moose and caribou populations.

Proposal 81. Support. This is a logical request.

Proposal 82. Support with amendment. I would support if the number of permits was capped at the lowest number from the time period given. Also the start of the season should be moved to September 1 to give resident hunters first opportunity to hunt.

Proposal 83. Against. When a general hunt can not be supported no permits should be given to non-residents.

Proposal 85. Against. There is already a registration caribou hunt in this area.

Proposal 86. Support. This is a reasonable request and has precedence in the state. I believe that no hunting is allowed within ¼ mile of the Denali Highway near Cantwell, presumably for the safety of the nearby residents.

Proposal 87. Support. Adoption of this proposal will only help the resource.
Proposal 90. Against. Reasons given are not supportive of increasing the size of the CSH area.

Proposal 97. Support. I agree with the discussion provided by the proposer.

Proposal 101. Against. There is no indication of the number of events or the number of moose to be taken for such events. Adoption of this proposal without an indication of the number of moose to be taken or the type of event that would qualify for a permit would basically be giving a permit to take moose whenever the mood struck. This would be detrimental to the health of the moose population.

Proposal 105. Support. I agree with the points raised in the proposal.

Proposal 109. Support with amendments. Unit 25C should also be included. Current regulations indicate abundant game in this unit. Moving the bear season up would allow for more bear hunting opportunities, especially in Unit 25C as it would open before the caribou season.

Proposal 113. Support. I agree with the points raised in the proposal.

Proposal 117, 118, 119, 120, 121, Support.

Proposal 126. Against. No viable reason given for the date change.

Proposal 128 and 129. Support if amended. If amended to any antlered moose I would support. It appears the population can sustain such a hunt especially since the Fish and Game is proposing an antlerless hunt in this unit (Proposal 125).

Proposal 132. Against. Moving the non-resident season to coincide with the resident season puts the two in conflict. Residents should have priority.

Proposal 141. Support. This is a reasonable request.

Brian West
1000 Oceanview dr
Anch Ak 99515
I support as the other units around 19C are open for brown bear aug 10

I have hunted 19C for many years and have not had any nonresident hunter conflicts
November 1, 2016

Ted Spraker, Chair
Alaska Board of Game
c/o ADF&G Boards Support
PO Box 115526
Juneau, AK 99811-5526
dfg.bog.comments@alaska.gov

Subject: Comments on proposals for February 2017 Interior Region meeting

Dear Mr. Spraker:

The Wrangell-St. Elias National Park Subsistence Resource Commission (SRC) met in Copper Center, Alaska, on October 11 and 12, 2016. The SRC reviewed three proposal that will be considered at the Interior Region meeting in February 2017 and would like to provide the following comments:

**Proposal 84: Lengthen the trapping season for wolf in Units 12 and 20E**
The Wrangell-St. Elias National Park Subsistence Resource Commission supports the proposal as written. Aligning the state and federal season dates for wolf trapping in Units 12 and 20E will provide additional trapping opportunity and reduce the potential for confusion.

**Proposal 90: Expand the Copper Basin community subsistence harvest hunt area by adding a part of Unit 12**
The Wrangell-St. Elias National Park Subsistence Resource Commission opposes the proposed expansion of the Copper Basin Community Subsistence Hunt area. The Commission is concerned about the potential for increased hunting pressure in Wrangell-St. Elias National Preserve that could result from this expansion. Additionally, the community hunt is not working. In our October 13, 2016, letter to you, we recommended discontinuing the community hunt and starting discussions with stakeholders in the Copper Basin about alternatives to it.

Chair: Karen Linnell; Members: Dan Stevens, Don Horrell, Gloria Stickwan, Raymond Sensmeier, Robert Fithian, Sue Entsinger, and Suzanne McCarthy
Proposal 91: Modify the hunting season and bag limits for grouse in Unit 12

The Wrangell-St. Elias National Park Subsistence Resource Commission supports the proposed change in harvest and possession limits for grouse in Unit 12 (5 per day/10 in possession, except 2 per day/4 in possession for ruffed grouse). The Commission does not support the proposed change in season dates, however, and suggests modifying the proposal to drop the proposed change to season dates. For several years, the SRC has been hearing about groups of hunters taking advantage of the current liberal bag limits and harvesting large numbers of grouse within Wrangell-St. Elias. We are concerned about the potential for these high harvest levels to impact the grouse populations, and believe that reducing the harvest and possession limits would help to address this issue. With regard to the proposed modification, some local residents harvest grouse in the winter, and the Commission feels that it is important to maintain that opportunity.

Thank you for the opportunity to comment.

Sincerely,

Karen Linnell  
Chair

cc: NPS Alaska Regional Director  
Superintendent, Wrangell-St. Elias National Park and Preserve  
Governor of Alaska
To whom this may concern,

For non-residents like myself and my hunting party, hunting in Alaska is truly a dream and an opportunity that does not present itself very often. Unless a person has the ample funds and the available vacation time to take, such trips can be a once in a lifetime opportunity. Fortunately for us, we have been blessed with the chance to come up and hunt for a second time. Our first hunt was for Moose in 2013 which was amazing, however unsuccessful. On July 6, 2015 my two other party members as well as myself booked a caribou hunt with Arrowhead Outfitters to take place from August 21-31 of 2017. This will be our first ever caribou hunt and our second adventure to your amazing state which we are beyond excited about.

With regards to the new proposals that have been recommended for the upcoming Caribou season, we ask that you please take into consideration the limited opportunities that most non-residents have to make trips to Alaska for such adventures. For the recommended bag limit, my party in particular, we each only purchased one tag. We are after adventure as well as to harvest a good representative member of the species. For each person, one caribou will be more than enough and as we have experience in wilderness meat preservation, our intention is to bring the meat home. As for the shortening of the season to the new proposed August 25-Sept 7, this will obviously affect our available time to hunt as our plans are already in place and vacation time has already been asked for. This is truly the part that we ask for you to take into consideration. I speak not only for myself but for the other members of my party, Rick Martensen and Noah Killion, that we are truly grateful for the chance to be able to come up and hunt in such an amazing place and for the fact the seasons are as long as they are for Caribou. This is what makes the ability to plan for these trips easier and achievable. Please take this into consideration.

Thank You
Submitted By
Keith Bennett
Submitted On
2/3/2017 9:06:14 AM
Affiliation
arrowhead outfitters

Phone
307-281-0078
Email
cissxscoot@yahoo.com
Address
P.O. box 535
Sundance, Wyoming 82729

My wife and I have already gotten a 2017 Caribou hunt booked with arrowhead outfitters and I am very dissappointed that this is all coming up now we have been working on planning a hunt for several years and finally have it booked and now this all is coming up and also the fact that we have already each purchased two caribou tags. I do not think that even if this goes in to effect that it should change things for this current year. Maybe put it in effect for a year or so down the line so non residents know about it before there hunt is booked and paid for I do not think it is a fair shake for the ones who have already gotten there 2017 hunts booked. Please consider the fact that alot of non residents that are already booked in will not be delighted with this change
I have been planning my once in a lifetime trip with 3 life time friends. This trip as a non-resident has required 2 years of planning, preparation, and significant expense.

I am sensitive to herd management to keep the quality of the animals and for the folks that live off of them. We have had similar issues in Iowa related to deer and CWD and general herd management. One thing from our experience is the focus needs to be the cows. If you want more animals, do not shoot cows, if you want less, shoot cows. Changing bull regulation or season lengths will drive the desired impact as much as cow herd management. I would recommend considering this.

You have a wonderful resource for resident and non-resident hunters and when you shorten a season to only 2 weeks you will simply have certain people from outside the state will have to choose to spend their dollars elsewhere where the environment is more open to their schedule and a good hunting experience. The shortened season also hurts local business as they have less time to interact with hunters and improve their incomes. That in itself is a huge factor to your economy.

While we are already planning to hunt in 2017, a change such as the one proposed would likely change our plans for future hunts due to the uncertainty of knowing a year in advance of what the hunting regulations would be for 2018 or 2019 especially in relation to dates.
February 3, 2017

Dear Alaska Fish and Game,

I am writing you today to express my concern over Proposal 105. It is my understanding that this is set to be presented to you in mid-February. My understanding of this proposal is that it is targeted to increase the caribou hear by 250-300 animals. I have read the proposal and have several concerns that I would like to present for your consideration.

The proposal comes significantly late in the 2017 hunt planning season. I have traveled to Alaska on three other occasions to hunt. My planning starts years in advance. I research locations and outfitters to work with. I confirm my entire hunt and travel plans as the earliest possible date. I need to coordinate vacation time, work commitments, and family time. My pre-planning allows me to resolve all of my personnel and professional issue in advance so once hunt time is here I am able to enjoy my time with friends and family.

My decision to book a 2017 caribou hunt was made biased on current hunt regulations that allowed me to harvest more than one bull. In addition, I researched past years and multiple bull harvest has always been allowed in the unit I have chosen to hunt (26B).

I have already committed over $5000.00 to my 2017 caribou hunt. I have secured a transporter, purchased licenses and locking tags, purchased a flight, booked a hotel, and secured a rental car. In addition, I extended my trip in Fairbanks to do some sightseeing (and put some additional money in the local economy).

Now, in the same calendar year as my booking, a change the bag limit is being proposed. This is unfair to the people who have planned for years to make a dream hunt reality. The proposal has very little impact on the resident hunter and a significant impact on the non-residential hunter. It is the non-resident hunter is the one that pours the money into the local economy and supports the ADF&G with the tag fees. Please consider the financial impacts in addition to the unfair treatment of non-residents.

I live in Ohio. We have a fluctuating deer herd. When The Ohio Division of Wildlife wants to regulate the herd, it does it through the harvest of does. To reduce the heard you harvest more does. To increase the heard your harvest fewer does. The number of does determines the numbers in the herd not the number of bulls. Proposal 105 does not adequately address this proven game management technique. It is just an attempt to solve a problem on the back of non-residents.

Proposed season dates created significant difficulties for non-residents and do not ensure a reduced harvest. As a Superintendent of a school district, it is very important that I and all of my teachers plan vacations that do not interfere with our responsibilities to our schools. One of the reasons I choose this trip is that it did not interfere with the school year and my professional obligations. Limiting tag numbers rather than hunt dates is the only way to ensure the harvest gets limited. In no way can a shorten season guarantee a smaller harvest. It just serves to further solidify the alienation of non-resident hunter.

And we are doing all of this to increase the heard by 300 animals? Is this dramatic of a change is necessary to do that? Does this really make the most sense? Or are they just looking to keep the heard to themselves and not allow others reasonable access to your great land and resources. Acceptance of this proposal will do exactly that. You will be telling the non-resident hunters that they can come but only under terms that resident hunters are happy with. Are we saying that resident hunters are most qualified to make the decision for all Americans and hunters in general?

Acceptance of Proposal 105 will only serve to alienate all non-residents and will not solve any of the problems. If Alaska doesn’t need their tag fees and the outfitters don’t need our business that is fine with me. I am sure I can book my future hunts in the Yukon. The Yukon Outfitters Association certainly appreciates what non-residents do for their business and the money we bring into their economy. I hope the board considers my comments and look at some different alternatives. Please do not hesitate to contact me if you need additional or clarifications.

Respectfully,

Michael Candela
440.969.4286
mike.candela@pvschools.org
I am writing this letter to express my deep concern about changing the caribou hunting regulations so late in the season. I have planned this trip well in advance purchased everything from hotel rooms to Rent-A-Car's to hunting permits etc. my decision to book this caribou hunt was based on hunt regulations that currently allowed me to harvest more than one bull. I have already committed well over $5000 towards this Caribou hunt I have purchased licenses locking tags booked flights and plan to meet family in Fairbanks. At the very least there needs to be some provision for people that find themselves in my position and in the long term I believe the goal should be to find alternative ways to preserve the Caribou heard all at the same time continue to get the economic benefit the nonresident Hunter brings to the Alaskan economy. Just as a sidenote in some of the circles that I am in quitting people are starting to say I bet the Yukon outfitters association will be happy to hear about this. Let's just keep the Brooks mountain range a true national treasure and allow like minded people to continue to enjoy and support Alaska and its beautiful resources proposal 105 will only be only in a nonresident hunters so this letter is sent urging you not to support proposal 105 thank you
I am writing in regards to the change of season and bag limits for non resident caribou hunters.

I have a hunt booked this August through Arrowhead Outfitters. This is a a trip I have dreamed of my entire life and have finally been able to save the money to make this trip come true. I have everything all set up and ready to go. We have tags bought, hotels booked, rental cars secured, satellite phone reserved not to mention the gear I have been buying over the last couple years to make this trip a possibility. My partners and I have exhausted a lot of time and energy into this to make this the trip of a lifetime.

To have someone come in on the 11th hour and throw a wrench in your dream isn't very fair. There are a lot of things that can be done to help herd numbers out. I think you have already taken some of those steps by reducing tags to 2 bulls and doubling the cost of tags to non residents but you aren't even willing to wait to see if that will have an impact. I feel you are jumping the gun looking to do to much to fast. I think by reducing the cow season that in its self will make a huge difference. I realize there are residents who depend on the herds for survival, but nobody should be able to shoot 20 a year. That is way more than any family could even consume. According to your data the nonlocal residents are taking the largest toll on the herds. So why don't we cut back a little on the total they can shoot.

I hope you can put yourself in our shoes and realize you are effecting a lot of peoples dreams by making these changes. I hope before you make such drastic changes you have the courtesy and compassion to give more notice to people. I appreciate your time and hope you take this into consideration.

Thanks!
As a non-resident who purchased my caribou tag in December 2016, along with resident and non-resident hunters, we planned to hunt Unit 26b in early August.

I request that caribou hunting season length for nonresidents in unit 26b remain open for all of August 2017.

With the financial incentives the state made by raising license and tag fees for 2017 but allowing previous rates through 2016, our hunting party, and I'm sure many others, purchased tags before the end of 2016. We purchased based on the season available to hunt at that time.

Given the fact that the state created an incentive to buy tags and licenses early, it is unfair to then drastically restrict hunting opportunity after tags and licenses are sold.

We understand that the health of the herd is vital, and fully support the remaining management practices offered by ADFG, including bull only and bag limit restrictions. I support the elimination of all cow harvest for resident and non-resident to allow the herd to recover, which is more biologically significant than season restriction. ADFG could also also limit or eliminate the future tags available for that unit by alerting purchasers at the time of purchase of the closure to tags for 26b. This would restrict the harvest in 26b, but not limit bull harvest to those individual who purchased tags when the full season was offered by ADFG.

We request the opportunity to hunt in early August, as was the case when tags and licences were purchased.

Thank you.

Luke Conyac - 2017 non-resident caribou tag holder
Ladies & Gentlemen,

I recommend that you leave area 26B open to non-residents for 2 bull caribou. If you want to get numbers back in the caribou herd limit or eliminate the cow harvest and encourage or get involved with predator control (wolves, coyotes and bears).

This is not fair to people who have planned vacation times years in advance. It is bad enough for a non-resident to have the game tags and license fees double but to shut the area down to non-residents with this short of a notice is irresponsible and short sighted. This will effect the State of Alaska's revenue stream more than you would expect. I have hunted an fished in Alaska on many occasions and spent alot of money in communities and with outfitters which benefits everyone living in Alaska. You're recent actions will isolate you from non-residents coming in.. Once lost it takes along time to get it back.

Sincerely,

Bob Crane
PO Box 550
Hardin, MT 59034
To whom it may concern,

My name is Cody Drake, myself and 3 of my life long friends have been working on and setting up a trip to go caribou hunting in Alaska for years now. It has always been a dream of ours. So, through saving of money and vacation days we scheduled a trip with Arrowhead outfitters for this year August 10th-19th. As you could imagine we are all very excited to make our first hunting trip to Alaska. Now we were saddened to learn of these new proposed changes, being that the nonresident hunting season doesn't even open until we are to be back home. Our plan tickets are already booked, Alaskan license and tags purchased, hotels in Fairbanks reserved and rental cars paid for. Being an avid sportsman and conservationist I understand the concern with the caribou numbers for changes to be made. Cutting the number of caribou that can be harvested is a logical measure that could be taken, but shortening the non resident season to 2 weeks is not. Coming from the lower 48 with flights and tim restrictions it will be almost impossible to fit a group like ours into a 2 week window. Please take my comments into consideration when making your decisions.

Respectfully,

Cody Drake
I'm writing today to express my strong opposition to Proposal 105. I booked my hunt (August 14-20, 2017) some time ago, and have spent considerable money on licences, tags, airfare, hotel, transportation and the hunt itself. Making changes to the regulations at this late date would impose a significant financial hardship for me and my hunting partner as much if not all of this money is non-refundable.

We had to commit to dates and have locked in vacation time at work for this already. Shortening and moving the season would in all likelihood mean that we would not be able to take this trip of a lifetime. I strongly urge the Board of Game to defer any regulation changes for the current year to avoid these hardships for my group and the many others that have made similar arrangements to mine.

Sincerely,

Eric Duncan

Vancouver, WA
COMMENT RE: PROPOSAL 105

As a non-resident who purchased my caribou tag in December 2016, along with resident and non-resident hunters, we planned to hunt Unit 26b in early August.

I request that caribou hunting season length for nonresidents in unit 26b remain open for all of August 2017.

With the financial incentives the state made by raising license and tag fees for 2017 but allowing previous rates through 2016, our hunting party, and I'm sure many others, purchased tags before the end of 2016. We purchased based on the season available to hunt at that time.

Given the fact that the state created an incentive to buy tags and licenses early, it is unfair to then drastically restrict hunting opportunity after tags and licenses are sold.

We understand that the health of the herd is vital, and fully support the remaining management practices offered by ADFG, including bull only and bag limit restrictions. I support the elimination of all cow harvest for resident and non-resident to allow the herd to recover, which is more biologically significant than season restriction. ADFG could also could also limit or eliminate the future tags available for that unit by alerting purchasers at the time of purchase of the closure to tags for 26b. This would restrict the harvest in 26b, but not limit bull harvest to those individual who purchased tags when the full season was offered by ADFG.

We request the opportunity to hunt in early August, as was the case when tags and licences were purchased.

Thank you.

Joe Gasper - 2017 non-resident caribou tag holder
Submitted By
Timothy B. Grace
Submitted On
2/3/2017 3:06:32 PM
Affiliation
Phone
573-864-5660
Email
tandigrace@hotmail.com
Address
2800 E Cheavens Rd
Columbia, Missouri 65201

Yesterday, I was informed by Arrowhead Outfitters about Proposal 105. My hunting partner, Al Buchanan, and I have already booked our caribou hunting trip (Aug 21-Sep 2, 2017) with A.O. In addition, during Dec 2016 we each purchased two, 2017 bull caribou tags. We have already committed our time and considerable resources to this once-in-a-lifetime hunt for each of us. In good faith we planned our hunt according to the regulations available to us. I understand that regulations need to change from time to time, but ask that you please not change the regulations for those hunters that have already committed their time and resources to a hunt. Thank you for considering my comments, Tim Grace
In order to caribou hunt in Alaska as a non-resident a significant amount of time and preparation needs to take place at least 1-2 years prior to making the trip. With vacation schedules due for many at the beginning of each year, the school schedule having to be taken into account for children, and the issues that are present with travel schedules a shortened season will pose even more issues.

You have a wonderful resource for resident and non-resident hunters and when you shorten a season to only 2 weeks you will simply have certain people from outside the state will have to choose to spend their dollars elsewhere where the environment is more open to their schedule and a good hunting experience. The shortened season also hurts local business as they have less time to interact with hunters and improve their incomes. That in itself is a huge factor to your economy.

While we are already planning to hunt in 2017, a change such as the one proposed would likely change our plans for future hunts due to the uncertainty of knowing a year in advance of what the hunting regulations would be for 2018 or 2019 especially in relation to dates.
Submitted By
Bud Grimes
Submitted On
2/3/2017 3:40:53 PM
Affiliation

Phone
651-334-0616
Email
grimesbsjk@aol.com
Address
5906 Blackberry Bridge Path
Inver Grove Heights, Minnesota 55076

I am a non-resident hunter that has been planning/booking a once-in-a-lifetime early August 2017 caribou hunt with outfitter for over two years. We were planning to hunt in GMU 26B. I understand that a shorter season is being contemplated for this area (August 25-Sept.7, 2017). Please consider expanding the season to at least August 1 - September 7, as well as a two bull limit for non-residents. our travel plans include not only hunting, but also over a week of sightseeing in the Anchorage/Denali/Fairbanks area. Should our hunting dates need to change on short notice, we would be greatly inconvenienced and would surely incur a financial impact due to cancellation/change fees with airlines, hotels, car rentals, etc. Thanks you for your consideration of this request.
I understand that a shortened season for non-residents in unit 26B is being considered for the dates of August 25-Sept. 7, 2017. I am a member of a party of three non-resident hunters and we have already booked a hunt with an outfitter for August 3-13, 2017. In addition, we have scheduled vacations from work, and made airline, car rental, and hotel reservations. If the hunting dates are changed on short notice, as you are proposing, we would not only miss our hunt but likely would take losses on the reservations we have already made. Please consider expanding the season for non-residents to August 1- September 7, 2017. I would also request that you place a two bull limit on caribou for non-residents. We are responsible hunters. Thank you for your consideration of this request.
I was just made aware of the proposal to limit the number of caribou that can be harvested in 2017 by non-residents from 5 to 1. Also of the shortening of the season. I am part of a group that started planning a Caribou hunt early last year for Aug of 2017. We have all bought our tags for 2 Caribou each and have dates set for the hunt. Under this proposal, we will need to change the dates of the hunt or possibly have to cancel it altogether. We also will have wasted our money on tags that we will not be able to use. As we are coming from Hawaii, you can understand the difficulty of coordinating a hunt like this. We are all very excited and have been purchasing the necessary gear as well. I understand the importance of keeping the herd #s up and agree that actions should be taken. But to do it at the last minute is unreasonable for those of us that are not over-harvesting and are already significantly invested in the experience.
Hello.

I am commenting in reference to the RHA proposal for Unit 26B. I respectfully but most vigorously oppose this proposal for the following reasons:

My caribou hunt is a 30 year dream that due to parenting responsibilities, finances, and job (coaching) responsibilities has been put on hold for all these years. 18 months ago a long time friend and I were finally able to book this hunt and have been excitedly planning it ever since. Part of that planning included purchasing my caribou lock tags in December of this past year (2016). Because of the way the then current regulations read I purchased two of them for the unit we would be hunting. If the RHA proposal passes I would only be able to use one of my tags in Unit 26B.

Even worse, since my teaching responsibilities resume in mid August of each year, passage of the RHA proposal would mean the season no longer aligns with my work schedule.

I sincerely thank you for taking into consideration my comments, and again reiterate my opposition to the RHA proposal for Unit 26B.

Respectfully,

Kevin J. Hansen

Zell, SD
I am a nonresident hunter who has been enjoying your State for over 20 years for both fishing and hunting on many guided and unguided trips. The ADFG has done an outstanding job of managing the wildlife and providing hunting and fishing opportunities like no other state in America. I have partnered with a group of 10 nonresident hunters and acquired Arrowhead outfitters more than a year in advance for this caribou season in mid August. We have purchased 2 tags, licenses and much of our gear in anticipation of this hunt. It is my understanding the proposed rules are to assist in increasing the herd size by shortening the hunting days and reducing the harvest number primarily to the nonresident hunters. The recommended increase is less than 300 animals which is very insignificant amount regarding a herd of the CAH size. I would ask that due to the insignificant variation in herd size which would not have a long term impact on the herd size that the decision to make these changes during this current season is unfair and too quick to draw a conclusion. Please continue to allow the nonresident hunters 2 bulls until further information can be concluded.
My name is Chris Kapral. I am from Michigan. Each year I plan for and make a hunting trip to the Western United States or Alaska. My hunting parties consist of 2-6 guys and the group of guys with whom I hunt are sportsmen in every sense of the word. We live to enjoy the variety of hunting experiences and species country has to offer. Care of meat is of great importance to us as we always make arrangements to transport it home to share our "exotic" game with friends and family. Additionally, since our group consists of guys with varied economic means and physical condition, we typically try to schedule our trips 1-2 years in advance.

Hunting caribou on Alaska’s north slope has been on our bucket list for a number of years and after a lot of research and reference checking, in Fall 2016, five of us booked a 2017 trip with Arrowhead Outfitters.

We just learned of a proposal to reduce the allowable harvest from five animals to a single bull caribou and to reduce the season length to Aug 25-Sept 7. While I respect and support the need to properly manage Alaska’s game resources, these changes hit me as being quite draconian and if enacted, will severely limit non-resident hunters’ ability and willingness to hunt this resource. Additionally, these changes would also mean that should we wish to come back for another hunt in the future, we will be unable to bring our children who are still in school.

Therefore, I would ask that the Alaska Dept of Fish & Game consider the commitment of time, planning and expense of non-residents when contemplating the regulatory changes for caribou hunting later this month and make the reductions in season length and bag limits less severe.

Sincerely,

Chris Kapral
To: The Board of Game:

I am submitting comments in regards to Proposal 105-5 ACC 85.025, specifically, the changes to non-resident caribou regulations in unit 26B.

As a NR hunter, traveling to Alaska to hunt requires intensive planning many months, often times a year or more, in advance of the hunt. This includes making significant financial, as well as personal, commitments in order to secure the necessary logistical accommodations and vacation time needed to accommodate several days of travel alone. The proposed changes present some challenges, especially for us NRs that have already made commitments and arrangements to hunt caribou in Alaska in 2017.

In the proposed changes, I am supportive of a reduction in NR caribou harvest limits to Bulls only and eliminating all NR cow harvest. As opposed to a 1 Bull harvest limit, I am proposing a revised reduction from 5 Bulls annually to 2 bulls annually for all NR caribou hunters. Furthermore, the proposed revised NR season dates of Aug 25 - Sept 7 will virtually eliminate the opportunity for a significant number of NR hunters all together. The logistical resources available will not be able to handle the current number of hunters in such a short amount of time. The flexibility of scheduling hunts will be eliminated leaving many NRs without any opportunity at all due to work, family and personal obligations during the proposed shortened two week season. I propose a shortened NR season, but one that would run ~4-6 weeks from approximately Aug 1 - Sept 7. These proposed dates will protect caribou during critical calving time periods while still offering NRs a legitimate opportunity to schedule a 5-10 day hunt.

The proposal's concern for lack of in-field judgement (wound rates) and wanton waste due to inability to properly care for meat is something I can relate to and is of utmost importance to me. If hunters are demonstrating an inability to care for meat properly due to negligence and/or poor decision making, I believe other measures can and should be taken to address the issue as opposed to significantly reducing and nearly eliminating the opportunity for all NRs to experience a Northern AK Caribou hunt. As validation of my thoughts on this subject, I want to note that I have hunted bison in AK, was successful, and experienced the rigors of extracting every pound of meat from the field by pack frame and raft, securing space on a freezer truck and paying for transportation back to WI so that I could ensure every pound of the animal was responsibly cared for, preserved and is currently providing numerous meals for myself, family and friends.

I appreciate the Board of Game taking the time to consider my comments and revisions to the proposed caribou hunting regulation changes in Unit 26B.

Sincerely,

Nicholas Kapral
These comments pertain to proposal 105. I would like to request that caribou hunting season lengths for nonresidents in unit 26b not be significantly restricted for 2017. With the financial incentives the state made by raising license and tag fees for 2017 but allowing previous rates through 2016, our hunting party, and I'm sure many others, purchased tags before the end of 2016. Our plan is to hunt in unit 26b in early August, and our party includes nonresidents. Given the fact that the state created an incentive to buy tags and licenses early, it is unfair to then drastically restrict hunting opportunity after tags and licenses are sold. We understand that the health of the herd is vital, and support other management practices including bull only and bag limit restrictions. We would just like to have the opportunity to hunt in early August, as was the case when tags and licences were purchased. Thank you.
I would like to comment on **Proposal 105** concerning unit 26B. It has been a lifelong dream of mine to go to the great state of Alaska to do a DIY caribou drop hunt. After many years of saving money and accruing enough vacation time I was able to start turning my dream into reality. A friend and I have already booked an air taxi, flights from PA to AK, a rental car, hotel accommodations, and posted vacation time at work for an Y2017 August 21st – September 1st caribou hunt in Unit 26B. We purchased two caribou tags as well in anticipation of the hunt. We have spent countless hours preparing for this hunt. We are both avid hunters and understand the importance of respecting game animals and not wasting the meat that they provide. I think most all other hunters who travel to AK to hunt have the same amount of respect for these animals.

The proposal suggests changing the harvest limit from 5 bulls down to only 1. While I agree that 5 bulls is probably too much I think that 2 bulls is still reasonable and manageable (our air taxi only allows for 2 bulls). The proposal also asks to shorten the cow season. I think that there should be NO cow season for non-resident hunters. Lastly the proposal asks to shorten the non-resident hunting season from August 25 – September 7. The air taxi that we are using won’t fly after September 1st due to potential weather conditions/concerns. With this short window it would not allow for any delays that may arise.

If the committee does decide to make these changes they should also decide to wait until the Y2018 or Y2019 to implement them since many hunters who share my dream of hunting for caribou on the tundra have planned for the hunt well in advance of this year.

Kind regards,

Jaison Kenney
To whom it concerns,

I am currently booked to go on a hunt of a life time this August (2nd through 8th) with Arrowhead Outfitters. We will be hunting for Caribou north of the Brooks Range. It has been a dream of mine to hunt for big game in Alaska since I was a young boy. I am a middle school math teacher in a small town outside of St. Louis, MO and finally decided to go after my dream hunt several years ago. After saving money for a couple years, I finally booked a hunt for August 2017 last spring. Since that time I have been buying gear and reading up on the hunt to gain as much knowledge as possible about my upcoming adventure.

In December, I heard that the State of Alaska would be doubling the price of licenses for out of state hunters due to the passing of HB 137. I was fine with this, and understood why. I was also grateful that I was given the opportunity to purchase my license at the old price, and did so. My hunting partner and I both bought our 2 caribou tags along with our hunting and fishing license for our upcoming trip. But, when I found out less than 12 hours ago about proposal 105, I was overcome with several emotions including anger and saddened. After sleeping on it, I am more confused than anything else. This has been a dream hunt since I was a little kid watching hunting shows of guys I looked up too hunting in Alaska. And it started to become a reality last spring when I booked this Northern Brooks Range Caribou Hunt last spring. It finally became real after I acquired all the extra special gear I did not have, the plane ticket from St. Louis to Fairbanks, the rental car that we will be using for the two weeks while up there, and all the countless hours spent dreaming and reading about the great north.

To hunt Alaska as a nonresident, one does not plan a trip on a whim. Years are spent on planning, preparation, and saving. By passing proposal 105 this late in the game, affecting the 2017 hunting season, you are ruining the hunts that countless caribou hunters have planned for, paid for, and dreamed of. I understand the fact to regulate out of state hunters, but to do so this close to the upcoming season is ridiculous. The majority of out of state hunters already have planned their 2017 caribou hunt and by making these changes all of these people will be out hunts and money. The biggest problem I have with proposal 105 (besides it being effective immediately) is the shortening of the season. By pushing the start date back to late August you are taking away the possibility of students, teachers, and families to hunt. Being a teacher it is difficult for me to get a multiple weeks off in a row. What was so nice about this season starting August 1st was that I could hunt before the new school year started.

I understand the need to make changes on hunting to out of state hunters, but by doing this where it affects the people who have already booked hunts for this year is unethical. I truly do not understand how such dramatic changes can occur this quickly, with so many people being affected. My true passion in life is hunting and fishing, and Alaska is the king of all. Each year I explore new states and territories and have already looked into coming back to Alaska for a spring bear hunt in 2018. I can assure you that if this bill passes I will never come to the state of Alaska. With hopes and dreams of hunting all throughout your beautiful state it pains me to say this, but is true. If this is how we fellow hunters will be treated then I can find other places that will fulfill those dreams and not have to worry about a proposal being pushed through last second to end that trip. IF this proposal passes, I will be out thousands of dollars. As a 27 year old middle school teacher, this is a big blow. I ask you to please not pass this bill because too much is at stake for hunters like me who were looking so very forward to their upcoming 2017 Caribou hunt. Thank you for taking the time for reading this.

A concerned hunter,

Will Kiehne
My home is in Hawaii but Alaska is one of the most beautiful places we have ever visited. My family and friends have enjoyed many visits to the National Parks, fishing, and hunting. My boys are 7 and 9 and at that golden age where they still love to be with their parents and enjoy travel and outdoor adventure with us. As they get older and become responsible hunters we look forward to more Alaska trips. We need to plan well in advance for our travels booking a year in advance to coordinate vacation time and school schedules. The 2-week season for non-resident hunters is too short to allow for scheduling trip to Alaska. It is my understanding that the proposed changes will also effect the 2017 season which I booked in the Fall of 2016. The costs to change my travel plans would be enormous. Please reconsider your desire to shorten the season for non-residents. We love traveling to Alaska for all that it has to offer and want to continue to be regular visitors to your beautiful state.
Dear Alaska Dept. of Fish and Game,

I am writing to express my concerns to ADFG proposals to proposal 105.

First, I would like to say that I am a pilot for one of the largest air taxis operating in 26B during August, transporting caribou hunters into and out of the field. I work for Arrowhead Outfitters and we are the only floatplane operator in the area (that I am aware of). I have been flying for Arrowhead for the past 4 seasons and we operate primarily within a 50-mile radius of Desiree Lake (located 50 miles south of Deadhorse on the Dalton Highway).

During the past 4 years, I have seen a wide fluctuation of caribou numbers in this area throughout the month of August. One day I would fly and see very few caribou or several small bunches scattered around and then a week later they would be everywhere, or there would be few caribou on the flats but find them in the mountains. Additionally, I have seen no, or very few bulls early in August and then the last week of August they would show up all over the place. In 2016 the first two and a half weeks I only saw small bunches of caribou scattered all over and they weren't really moving around. Possibly due to the lack of bugs forcing them to keep on the move, but by the end of the month there were larger groups starting to move around and the number of bulls seen had increased significantly.

Changing the opening date of the season would have a very significant impact on Arrowheads operations. Since we are a Float plane operation, we try to be off the north side of the Brooks Range by the end of August due to the risk of the weather changing and the lakes freezing. If the season were to open August 25 we would be realistically shut down for caribou hunting. It would be unrealistic to only operate for one week. Additionally, we have clients already booked for 2017 and 2018, who have all made their travel arrangements and would incur substantial financial penalties associated with changing all their reservations. Another thing to consider is that a caribou hunt is a great hunt for families to participate in. An August 25 opening would curtail for many this wonderful bonding time due to children having to be back at school before the third week of August. I believe that the operators in Happy Valley would express these same concerns. I would like to see the season opening date August 1 – September 7 for non-resident hunters. This still reduces the hunt but stays within a reasonable timeframe.

I do support the change to move the start date for cows to August 1 but prefer to see that the cow harvest stop all together, for everyone.

Now as to how to reduce the numbers of caribou harvested I do support a one bull limit. I also can understand raising the cost of the non-resident harvest tag. That cost alone will reduce the number of caribou taken. I don't think that non-resident hunters would shell out the extra money for a second ticket. I believe that this is all that really needs to be done to achieve the goal of a 300 caribou reduction in the harvest number. I think if ADFG were to do this that Arrowhead Outfitters alone would show a reduction of 50 caribou.

Sincerely,

Les Lloyd
--Greetings from Montana--

Regarding proposal 105, unit 26B: (opposed)

I am a 52 year old hunter from Montana. I have hunted fair chase for 40 years in my home state. Coming from a state with plentiful big-game hunting opportunities and resources, I completely understand the concerns of the 'local' Alaska sportsmen and women considering they have invested themselves by living in Alaska, pay taxes in Alaska, endure the tough winters, and have a vested interest in the natural resources within the state. That said, I am able to be objective in this way because I have the same concerns within my own state regarding our resources.

I am not to be regarded a wealthy out-of-stater coming to Alaska to exploit the plentiful and amazing game resources which Alaska is so blessed to have. I am a law enforcement officer of 28 years and have not been fortunate enough financially to hunt out of my home state. I always planned to hunt caribou 'one day'. This species is the dream hunt for me and I always dreamed of doing so in Alaska rather than Canada. As luck would have it, I decided to check this off my 'bucket list' this year along with my brother and 2 good friends (first hunt of this kind for each of us).

We have been planning this hunt for 2 years and have already prepaid this hunt for the year 2017. We have paid our outfitter fees, purchased our licenses (I purchased 2 caribou licenses), paid airfare for August 7th departure from Montana, paid down on our vehicle rental, equipment rental, etc. As you can appreciate, our dates are set and our work schedules are coordinated with vacation and families summer plans adjusted accordingly.

With regard to the Alaska sportsmen/ women concerns about wanton waste of game animals, I could not agree more with this legitimate concern. In these days of financial tough times and considering the poverty we see in our own country, it is downright sinful to waste any portion of an animal suitable for food. I agree that 5 animals per hunter would be nearly impossible to manage without waste. Our outfitter, of his own volition, limits his hunters to only 2. I had considered only harvesting one animal; however, considering that this will be my one and only hunt of this kind, I could not pass on the opportunity to harvest 2 animals if I was so fortunate. I have done considerable research on how to best preserve the meat from spoilage and am confident we will not waste one bit.

In my home state of Montana, I have 3 children (all adults now) and we draw or purchase numerous permits for antelope, deer, elk, and an occasional sheep. In consideration of the number of animals we harvest locally, it isn't conceivable that we can utilize all of this meat. As a result, I have, for years, processed what we could use and then process the additional meat for friends, family, neighbors, etc. I am also a proponent of Hunters for Hunger and donate to this great program. It is a win, win situation for all.

I have already prepared a preferred shipper account with Alaska Air with intent to ship and much meat home as it financially and realistically feasible. In choosing to harvest to animals, I certainly expect that I will be seeking to share meat with the native Alaskans (a custom/practice I have been made aware of). Yet another win, win situation for all.

Certainly the sportsmen/ women of Alaska realize and appreciate the benefits of revenue brought into the state by out of state hunters. I cannot deny the importance in seeing it here in my own state. I realize that the Alaska sportsmen/ women do not want this revenue at the expense of their own hunting interests or ability to manage their resources. I feel the same way about the fish and game in my state.

It is really not unreasonable to allow an out of state hunter to harvest 2 caribou and expect the hunter to be able to effectively care for the meat. With regard to the proposed season change, I cannot, in fairness, weigh in on this issue except to address my party's issue for the 2017 season. We have purchased our permits and reserved our gear, vehicle, airfare all around the early August timeframe. We planned according to the seasons as they were listed, in good faith. I can understand if you choose to change the season a year later....this way hunters can plan to hunt or choose not to plan a hunt based on what they know.

I will not ramble on any further. Please know I share your concerns and understand how no person will care as much about the resource as those who live by and depend upon the resource. I also know that there is room for compromise so that we all can experience what makes Alaska so rich and great.
To whom it may concern,

I am responding to proposal 105… reduction of caribou for non-residents from 5 to 1.

My hunt group of 4 members is scheduled to be flown in to unit 26B by Arrowhead Outfitters this coming August. It is a trip we have been planning and saving for the last 3 years. One of the reasons for choosing AK and Arrowhead was ability to take 2 caribou. In fact all four of our party members have purchased 8 tags in 2016 to avoid the increase in pricing effective this year.

While I believe the taking of 5 caribou is unreasonseable for anyone other than subsistence hunters, it is my understanding that the reputable outfitters like Arrowhead have limited out-of-state hunters like myself to 2 animals.

I would ask you to take into consideration these comments and consider the planning that has taken place for us to make this a trip of our lifetimes.

Sincerely,

John P. McDermott, Billings, MT
Submitted By
Ron Mingo
Submitted On
2/2/2017 7:03:19 PM
Affiliation

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mingo@utilisplus.com
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7700 Sunwood Dr. NW
Apt 407
Ramsey, Minnesota 55303

Re: Interior/Northeast Region Comments

First I would like to thank you for receiving my comments and reading my concerns.

My name is Ron Mingo and I visit Alaska frequently as my son and his wife live there and contribute to the well being of many of the residence across the great state of Alaska. My son is a biomedical Engineer that flies to many of the remote villages and repairs all sorts of medical equipment for use in those villages, cities and towns. His wife is a registered nurse who tends to critical patients in the ICU department in Anchorage. My wife and I save our money so that we can take one trip per year to visit our children. We have booked a caribou hunt with the families well in advance of the license increases and paid for our flights also in advance. At this time I also purchased 2 caribou tags which are quite expensive. But we feel to be with our family in one place, especially Alaska is well worth it. But with the new proposal that has been introduced this year puts my family in somewhat dire straits with vacations for the year already put in. I feel that what is being done may be admirable but needs to have a grand father clause for people who have already paid and taken vacation. As residence of Alaska you know tourism is a very important part of the economy and should be preserved. I am not even sure of the league ramifications or if the state is liable as well as the outfitter for paying back all losses. So please review and remember many familys are involved in your decisions.

Thank you for your Time
Submitted By
Lee Molitor
Submitted On
2/3/2017 10:35:05 AM
Affiliation

~I am writing concerning the proposal to change the regulations for the 2017 caribou season in unit 26B. Being a non-resident we booked our hunt over a year ago and this would affect our trip greatly, the time we have already scheduled off work, flights we have booked. We already have licenses 2 Caribou tags purchased for this hunt (We are hunting for bulls). I would ask that you don't approve the changes and keep the current regulations. There has been a lot of time planning and money invested in organizing this potentially once in a life time trip.
Thank you for your time and consideration.
Hello, It has been brought to my attention that there are dramatic changes, proposal 105, to the carabou season in 26 B. I am part of a four party group that has booked and paid for a hunt with Arrowhead Outfitters for the 2017 season. Vacation time has been booked, tags purchased, equipment bought all of these items are a major financial investment. We have been planning this trip for a long time. One of the things that drew us to hunt Alaska was the longer season and the stability of quotas. Planning a hunt so far away requires most of the planning, booking and vacation time be done well in advance. The price of both tags and air service is such I cannot afford to gamble on the ability to hunt. While there is no argument that changes to game regulations are part of good management, changes in season length and quota changes in the same year as the hunt are very difficult to deal with. As nonresident hunters the amount of money put into both the Department of Game and Fish and the local economy is huge. No one is asking your department to stop managing your resources only plan far enough out so as not to waste my funds on tags I cannot fill and time off that I cannot use. As a sportsman I enjoy the hunting offered in Alaska and have hunted there three times in the last ten years and plan to do so again. However, if season length and quotas are going to be changed this quickly it forces me to take a second look at were I can spend my hunting dollar. Please do not penalize our party for booking far enough in advance to ensure reputable air service and a time slot that fits our vacation time options. The stated opinion offered that nonresident hunters care little for wounded animals or only worry about meat care after the shooting stops is not only wrong but offensive. With the waste fines as high as they are economics alone puts this first and foremost on minds. I have been hunting since old enough to obtain a permit. Never has any meat been wasted. A sportsman is a sportsman no matter the licence plate that hangs on their vehicle. This misguided opinion offered unfairly puts all nonresident hunters in a small group of unethical hunters both resident and nonresident. Allowing comments like that to affect hunting regulations is terrible. There are strict laws regarding behavior like that which means it is an issue for enforcement not game quotas or season length. As a lawful ethical hunter I feel it is unfair for opinions like this to be held against me. The only part of the rha proposal I can agree with is the elimination of the cow season. Cow seasons are for subsistence hunting and dramatic population control only!!!! Since the population seems to to be in slight decline ending the cow season seems to be a no brainer. If quotas must be cut cutting it in half seems to be far more sensible. Lastly shorting the season as dramatically as proposed only makes it very difficult for nonresident hunters to bring families and get vacation time. The best way to slow the income from nonresident hunters to make it difficult to get the next generation started. This in turn makes it hard for outfitter and air taxes to be profitable. Which effects both the profitability of the Game and Fish and the local economy as well.

Thank you for the chance to comment

Vic Nelson
In regards to proposal 105: I have appreciation for the boards consideration for this herd. I am a 6-year resident of Alaska. I have hunted the CAH each of these six seasons and have done so in several different formats. I have hiked in on my own, hunted from the road, brought non-resident friends and hiked in, and also brought non-resident friends and flew in with an outfitter. While I don't claim to be an expert, I do consider my opinion to be educated. I am not a guide or professional hunter. I am a nurse. I live in Fairbanks. I am passionate about hunting.

Initially, The story listed by the Resident hunters of Alaska is certainly one that HAS happened. In my experience up there I can attest that this is NOT the norm. The statistics listed within the proposal attest to this. In the last six years only two non-residents have harvested more than two caribou. The only instance I've heard of non-local residents harvesting more than 3 caribou have been from non-local residents hunting via dog team during the spring season. I acknowledge that this is anecdotal evidence. But in that regard, its no different than the story of the gun-smoke caribou massacre presented in the proposal.

In regards to Wanton waste. I would be happy to testify to my observations that the residents are just as likely as non-residents to commit this offense. Throughout Alaska, I have in fact witnessed it in the hands of residents MORE than non-residents. I have two very distinct memories from unit 26B where a young resident military gentleman was hunting with his non-resident father. They did a terrible job of caring for the meat that they did harvest and much of the animal became wanton waste. This is not a fault of the non-resident as a populace in general. This is a fault of poor education. And also, just poor moral aptitude for the resource. It has nothing to do with residency status.

Lastly, the data does not support that non-residents are the cause of population decline and so I would not support changes that don't solve the listed problem. The problem in not associated with allocation and as such, allocation adjustments should not be used to correct it.

There is a comment in the proposal's cost analysis that "the proposal would not result in any additional cost to the department." I challenge this by adding that the reduction in non-resident hunters by shortening the season to August 25-september 7th would result in a dramatic decline in revenue. The department would not collect the revenue from their licenses and all of the business along the Dalton Highway corridor would suffer. Additionally several outfitters would face severe problems.

The outfitters on the north slope serve residents and non-residents without discrimination. Their operable season is primarily in early August. One outfitter in particular has to leave by the end of August because weather conditions start to change and the lakes start to freeze. With such a short season. The outfitters would be given a very small window to serve the demand and create enough revenue to maintain operability. With no motorized land access, people just aren't going to make that trip if they can't be outfitted by air taxi. If they do choose to hunt, it may create a situation where even more people would take up "road hunting" along the Dalton highway; creating more road wear and an increased safety hazard to the commercial vehicles beyond what already exists. As a result, residents like me simply won't bring their non-resident friends and family members up there to hunt. Again, this greatly decreases revenue to the state, sales to the business on the corridor, and drastically alters the department's harvest objectives. This may lead to a dramatic decrease in total harvest; perhaps even to a number below the department's harvestable surplus objective.

My proposal considers the need to protect the calves during the summer months and the states harvestable surplus goals:

Season dates for non-residense would be appropriate if they were August 1st - October xx.

Bag limit: Residents: 5 caribou total. No more than 3 can be cows.

NR: 2 caribou by harvest ticket. Bull only or perhaps only 1 can be a cow.

Consider informing the public of your management goals and request that you'd prefer they don't harvest cows! This can work. In 2016 the department made a press release regarding the Nelchina herd and requested that people DO harvest cows. As a result, my friends and I obliged and filled our tags by harvesting two cows.

Education does help.

Please contact me directly via my cell phone if you'd like me to further describe my experiences cited in forming the opinions I've presented today.
Thank you for your consideration.

Sincerely,

Steven J Opat

Faribanks Alaska

507-259-0697
Submitted By
Richard Peerson
Submitted On
2/3/2017 11:20:34 AM
Affiliation

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Opposed to rule changes in 26B

This will be my 6th trip to hunt in Alaska. I am bringing my 20 year old grandson and 2 other hunters for the first time. We have spent a year planning this trip and have about 25,000 invested in non-refundable airfare, vehicle, outfitters, equipment rental and tags. I think is is unfair to change the regulations at this late date. My grandson has saved for 2 years to make this trip with me. If you are concerned about herd numbers you should do away with the cow season or at least to a time they do not have young depending on them. Nonresidents spend millions of dollars in your State please consider how this affects them when you consider changes.

Thank you

Dick Peerson
Please consider rejecting or postponing (for at least a year) the last minute proposed changes to the 2017 Caribou Hunting Season presented by the Resident Hunters of Alaska. This proposal is a hardship to non-resident hunters who have already purchased (2) Non-Resident Caribou tags for the 2017 Hunting Season. These hunts were scheduled sometimes a year or more in advance, and therefore, proposed changes should take at least that long to be fair. Also, I have yet to see convincing evidence that the herd in question is declining in numbers, as opposed to simply combining with adjacent herds. The hardship described above to non-resident hunters extends to Alaska airlines, state hotels, vehicle rental establishments, big game transport outfitters, and many other businesses.
This comment is for the 2017 Caribou hunting in unit 26B Proposal 105.

I just wanted to express my concerns of this proposal for the Alaska Caribou season of 2017. My group and I (6 in total) have had a trip booked for a year and a half now and looking forward to coming to Alaska. Our main reason we decided to come hunt this area was because we could hunt 2 caribou each and it looks like some beautiful country. The reason we would like to take 2 caribou each as this will be the first caribou hunt for all of us and ideally if we are lucky enough would like to take one and then have an extra tag in our pocket to mainly trophy hunt for another. This being said more than likely not all of us will end up shooting 2 as I am guessing the odds of all 6 of us seeing a caribou that is substantially larger than the rest is very unlikely. The other reason on top of that is it is very expensive to fly to Alaska, rent a car to drive to our location, and take a bush flight in to hunt. This is another reason we would like the chance to be able to take 2 caribou as for many of us this will be a once in a lifetime trip up to Alaska to hunt.

Thanks,

Kyle Shoman
Commenting on changes in regulations to caribou hunts in 26b. I booked a non resident hunt with arrowhead outfitters 2 years in advance. My vacation days are already scheduled and plane tickets purchased and the shortened season is past my hunt which is scheduled aug 20 to the 26. I also have purchased 2 caribou tags and have invested thousands in this hunt. Thank you for your time
Hello,

I would like to give some brief comments on the proposed changes submitted by the RHA on caribou hunting in the Northern Brooks Range. My first comments come on the timing of the proposed changes. I understand that wildlife are one of the most important resources to the state of Alaska but the timing of these changes would mess up all of the hunts that have already been planned for the 2017 season. Trips to Alaska, as you well know, require a great deal of planning and preparation, and for my hunt in particular, plane tickets, tags, vehicle rentals, gear purchases, among other things, have already been purchased. The proposed changes would prevent me from going on the trip when all of these plans have already been made. I also assume this would be the case for everyone else that has planned hunts for 2017.

Now getting in to the actual changes, I support the proposal that Arrowhead Outfitters is proposing. The RHA is suggesting that the number of caribou that can be harvested decreases from 5 to 1. Arrowhead Outfitters only allows their hunters to harvest 2. This is a clear sign from the start that they have been doing a better job of managing the herd leading up to this change. I feel that reducing from 5 to 2 instead of 1 would effectivelly increase the herd size with the reccommendation of the biologist.

As far as the proposed hunt dates go, starting the season on August 25th would not allow this hunt to happen for myself or my hunting partner, but also it would eliminate all teachers and students from ever being able to participate in this hunt. I believe that Arrowhead's proposal gives a clear and adequate outline of a season that would make more sense.

Once again, I understand the value that game and wildlife have to the state of Alaska and for that matter, to states all across this great nation. I also understand that the RHA wants to limit non-residents from enjoying the same opportunities that they wish to have for themselves. If that is the message that the state wants to send, then so be it. It was my goal that I would return from this trip, not only with the experience of a lifetime, but also an advocate for the opportunities that Alaska offered. However, if the RHA's changes are accepted and we are not able to make the trip, not only will I lose all desire to ever step foot on Alaskan soil, but I will also ensure my friends, family, and all personal contacts feel the same way.

Regards,

Ethan Stenger
Submitted By
Edward G Stratman
Submitted On
2/3/2017 9:58:58 AM
Affiliation
Non-Resident Hunter
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I am beginning to be quite frustrated with Alaska's last minute changes for Non-Resident Hunter Regulations. Last year(2016) we lost several hundred dollars because of last minute changes for Non-Resident hunters in the Kotzebue area. These last minute changes show a lack of respect and disregard for all the Non-Resident hunters who have made plans, reservations, and invested thousands of dollars a year or more in advance. If changes are proposed, at least take into consideration all the Non-Resident hunters who have spent thousands of dollars for flight reservations, accommodations, and other expenses. Do not make the proposed changes to take effect immediately; rather put them into effect for the next hunting season at least one year off or longer. It takes at least a year or two to make such plans for a hunt in Alaska as a Non-Resident hunter. I would support some of the Outfitters who suggest shutting down the Cow season to Non-Resident hunters, and reducing the Caribou Bull harvest to one or two bulls. I believe the proposed Hunting Season for Non-Resident hunters from August 25 thru September 7th is too short. I also believe it should be more like August 1st thru September 7th for Non-Resident Hunters, especially now that all of our hunts have already been reserved, and flights and other accommodations have already been made.
Proposal 105 submitted by the Resident Hunters of Alaska (RHA)

As one of the largest outfitters that utilize this area of 26B, I would like to say that I do not feel the count is accurate. On this, the Biologist for Alaska Department of Fish & Game (ADF&G) Ms. Lenart and I agree to disagree. Without flying a grid, it is almost impossible to get the accurate information as there could be thousands of caribou, without a collared female in the group over the next ridge. We fly the area around 26B with two planes for a month. The herd is not moving. The lack of mosquitos and black flies probably plays a big part in the lack of migration and would also explain why they have seen caribou in Kuparuk oil field in later months more now than ever in the past.

The best way to raise the herd numbers is to stop cow harvest. If this cannot happen for subsistence reasons then shorten the season even more than suggested by ADF&G or simply allow the cow harvest within the area of Native Alaskan villages for the residents only, with smaller bag limits and shorter seasons. I prefer none of my clients harvest a cow. This season many did. I have 30 cows out of the 116 Caribou harvested on my transporter activity reports for the 2016 season. 21 of these cows were taken by Alaskan Residents. It is hard to demand clients do not harvest a cow when it is in the Alaska Hunting Regulations book as allowable. We make sure each group has a regulations book in the field with them. This proposed change is long overdue and welcome.

This year ADF&G raised the fee for the Non-Resident licenses and tags, most non-resident hunters will only purchase one at the new rate of $650.00 per tag. Some clients have already cancelled due to price increases.

Shorting the season to the suggested amount of two weeks at the end of August will put a hardship on all who come to Alaska for a "Once in a Lifetime Hunt". Families come and hunt for vacation. Children and teachers will not be able to attend at all. These hunters have booked the hunts a year or two in advance. It is not easy and very expensive to cancel/change the reservations at this late date; some will not be able to change due to work, children, or other responsibilities.

Yes, this would be a devastating blow to my business as well. I pride myself on being conscientious about the way my clients are prepared before they go into the field. I require each hunter to go through an orientation of what it means to leave no trace, being in bear country, what is expected when harvesting, etc. If clients have harvested, they do not have to stay in the field the rest of the scheduled trip. They call and we get them out within a day or two. If they choose to stay and it warms up, they have been instructed before the trip to bring the things needed to keep the meat cool by submerging it in the lake.

I support the effort to increase the herd. I do feel that predator control should come into play concerning the herd numbers but, decreasing the bag limit is a much better way to achieve the increase than to reduce the season to the end of August. The target being the hunter still has recreational days in the field. I propose the season run from August 1 - September 7 as the new decreased season. If you add the numbers on the Transporter Activity Reports for the outfitters that operate in the area, the decrease of bag limits and increase in prices of tags should reach the goal of 250-300 caribou unharvested for the season by non-residents alone. When you add in the ADF&G proposed changes to the Cow harvest and decreased resident bag limits to 5 caribou (instead of 5 per day) the unharvested animals of the Central Arctic Caribou herd should greatly surpass the goal set by ADF&G.
I am writing this letter in objection to Proposal 105, - possible changes to the 2017 caribou season. I am an avid hunter from Pennsylvania, and for many years the idea of experiencing an Alaskan hunt has been a dream. Last year, after years of saving both money and vacation time, I booked a drop off plane hunt for the last two weeks in August for caribou. I purchased my license and locking tags, and booked my flights, rental vehicles and more. While I understand the need for the ADF&G to responsibly manage the wildlife of Alaska, I hope you will also consider the timing and effort that go into planning a trip to your beautiful state. If the need to change regulations is real, I would hope it could be enacted far enough in advance to avoid the large financial loses that those of us trying to come to AK stand to incur. My hunting partner and I booked our trip a year in advance. Many hunters are booking even 2 years out! Most of the money I have invested in this trip, that took years to save, is non-refundable. The change in season dates alone will make my Air-Taxi and flights from PA to AK invalid and cost me at least $4,000. Finally I’d like to note that the proposal states that the cost of the change is $0. I believe this to be a complete falsehood. The ADF&G will lose over $600 in revenue from every caribou tag you do not sell. While I am unsure of how many nonresident caribou tags are sold annually, the math is evident that the revenue ADF&G uses to support their ability to responsibly manage the wildlife of Alaska will in fact be effected by a reduction in the nonresident tags being offered. I felt it was unfair of the proposal author to imply that the cost to both nonresident hunters already booked for trips and to the ADF&G was nothing.

Thank you for your time in considering my objection to the proposed caribou season and limit changes,

Regards,

Chad Toth
Hello, My name is Wade VanGinkel and I've just been informed by my transporter of the proposed changes for this season. As listed this would be disastrous for my son and I. I understand sound herd management but the changes are last minute.

We've saved over 2 years for this trip. Our tags, plane tickets and truck rental have already been purchased and nearly all is non refundable or unable to change the dates. Our group of 3 would be out nearly 10 thousand dollars which would weigh heavily on ever planning another trip.

Please consider our situation and I'm sure many others like me in making your decision.

Thank You for your time,

Wade VanGinkel
Thank you for the update. I have booked a trip with 3 of my best friends with arrow Head outfitter. We have already purchased our tags and paid for half the hunt. It has always been a dream of ours to hunt caribou in your great state. I have always enjoyed wildlife and understand how difficult it can be to manage herds. If the state decides to only let us harvest 1 caribou each I would appreciate my refund for the second tag that I have already purchased. I am opened for other fair solution that you may have. No one cares more about the wildlife than a hunter, best of luck to you all on coming to an agreement on these tuff decisions that you are forced to make. Sincerely Nathan Vowels CEO of the great Nathan's painting
To whom this may concern,

I am a non-resident hunter that has scheduled a Caribou hunt with Arrowhead Outfitters this past Fall. I have reviewed the proposals and have some concerns with the limited opportunities for non-residents. The bag limit reductions are warranted based on the research by the ADF&G. I would request that bag limits be reduced for non-residents from 5 to 2 harvest tags to preserve the herds. At least preserve the harvest tags that have already been purchased by non-resident hunters prior to these proposals.

Non-resident hunters need to plan out complicated logistics to hunt in Alaska and this takes time. These plans for 2017 have already been done or materially started. The shortened open season for non-residents is much too short to have these plans changed at this time for 2017 in my humble opinion. A request is to make open season for non-residents at least a manageable length of time to adequately plan a quality trip to Alaska for non-residents.

Your proposals may be warranted to protect the herd but please consider the severity of the changes and moderate the changes to preserve a healthy non-resident hunt and keep people coming to Alaska.

Thank you for your time.
Dear members of the Alaska Game and Fish board. I would like to first thank you for the job you do in managing the wildlife of Alaska. I am a non-resident hunter who has booked a drop caribou hunting trip for unit 26B in late August of 2017. This trip was booked last year, and I have already purchased two caribou tags and all required hunting licenses for such hunt from the state of Alaska, as have the three other non-resident hunters that will be in my group. First let me state that I fully understand and support the need for sudden last minute changes to regulations if there is a dire unforeseen circumstance that threatens the stability and future of a herd. In South Dakota we occasionally face this with isolated hemorrhagic fever outbreaks that suddenly and unexpectedly drastically reduce a whitetail deer herd in a certain area. However, from what I know that does not seem to be the case for the proposed last minute caribou hunting rule changes in unit 26B for the 2017 season. Rather the proposal seems to be one of long term herd management objectives and ultimate caribou population numbers.

I am asking you to consider some information that I will share in reaching your ultimate decision before you vote on Proposal 105. This hunt is now only six months away. The booking of these hunts occurs a year to two years in advance. Outfitters and the areas they serve are chosen by hunters due to known regulations. For non-residents to choose to hunt Alaska and invest countless thousands of their dollars on a hunt there must be a sense of some certainty and an expectation that at the last moment the rules will not suddenly be changed unless a dire unforeseen emergency situation requires such change. As I said, all in my group have already purchased and received two caribou tags per person for our 2017 drop hunt in unit 26B, which is where we are allready legally contracted to be dropped. In addition to the possible loss of the ability to harvest a second caribou each, it also means that passing proposal 105 will mean that our group was sold four 2017 caribou tags by the state of Alaska that we will now not be able to use. And to the best of my knowledge there is no process to return these tags and receive a refund from the state. Although at this late stage in the game, only six months prior to our hunt, that would be the fair, and appropriate, thing to do if proposal 105 is passed and we are restricted to one caribou per hunter by the state of Alaska. As a non-resident hunter I would also like to point out that this comes on top of the recent doubling of non-resident hunting fees and tags that went into effect January 1, 2017. If it is the desire of the state to discourage, or decrease, non-resident hunting in Alaska the passing of proposal 105 for the 2017 season at this late date and in conjunction with the recent sudden doubling in non-resident licensure cost will surely go a long way to achieving that goal. The shortening of the non-resident season will also make it much harder for many to visit and hunt Alaska, and severely restrict and harm Alaskan outfitters as only so many hunters can be accommodated in any given period. I know that the passing of proposal 105 at this late date will receive very unfavorable comments and opinion on the hunting forums and in the hunting community. And the end result of that is ultimately the resulting loss of massive tourism dollars, loss of massive income to Alaskans involved in the hunting industry, and loss of massive funding to Alaska Game and Fish through dramatically decreased future non-resident license and non-resident tag sales. Alaska is a great hunting destination, but there are many great hunting destinations in the world competing for the business and revenue hunters bring. It takes that revenue to properly fund the department and to properly manage Alaska’s huge wildlife resource. Whether I shoot one or two caribou this season is insignificant to the potential damage and long term negative financial effects that passing proposal 105, at this time, could have on the future of revenue from non-resident hunters.

I thank you for allowing me to comment. And I am certain that you will reach a decision that you deem to be in the best interest of Alaska’s wildlife. Thank you for your time and consideration.

Sincerely, Mark C. Wilson
I am against this last minute change to hunting regulations for the 2017 Alaskan caribou hunts. I have been planning my hunting trip to Alaska for the last two years. This new season directly affects me because my group is scheduled to hunt August 9-15, 2017. If you change the season it will have adverse affects on me and my group. We have paid for airfare, motel, vehicle rentals, outfitter and have been granted time off from work. If I have to make changes to my plans may result in me getting a refunded for my trip because other plans. If ten percent of guys like me can't make the trip because of changes to the season that could be a huge economic impact to everyone involved. Along with cancelling my trip I have purchased two tags for caribou the trip is more or less paid for. As for the wasted game left by out of state or poor ethical hunters I agree it angers me more then I can say. If I am unable to take two caribou would result in me not donating as much meat to Alaskan residents that rely on this meat. No one in our group is going to shoot more than two caribou and are not looking to shoot a cow. I hope you will consider how these concerns and other sportsman's concerns on changing these regulations so close to the up coming hunting season. Thank you for your consideration in this matter. Aaron Wittmer
I wish to comment on Proposal 142 to create a buffer zone around Denali Park to protect wolves from hunting and trapping. This is an excellent idea and one that deserves to be implemented and enforced fully. In light of the fact that the wolf population in Denali has been depressed for some time, a buffer zone would protect the individuals that the Park has from being killed or maimed when they wander across Park boundaries... which they inevitably do. The Board should be aware of the ecological value of a healthy wolf population: 1) wolves serve a valuable service in regulating the populations of ungulates. Ungulates, if overpopulated, will overgraze and/or overbrowse vegetation. 2) Wolves provide an incredible draw for tourism, which bring in major sums of money both to the Park, the State of Alaska, concessionaires in the areas of the Park. This includes both national and international tourism. My husband and I spent three weeks in AK a few years ago, and Denali and its wolves were a major reason for our visit. We go to Yellowstone NP at least once per year to see the wolves. It is very rare for anyone to be able to see wolves in a completely wild situation, and it bears no resemblance to viewing an animal in a zoo. Many more people are realizing this, and they want to experience seeing these animals in their natural habitat. 3) Addressing tourism a bit further, I would suggest that the Board review the revenues coming in from hunting and trapping fees versus the revenues generated by tourism from international and national tourism. 4) The Board should seek input from wolf and wildlife biologists to determine the scientific evidence confirming the importance of wildlife pathways in securing healthy populations of ALL wildlife, not only that of the wolves. Extending the protections afforded to wolves by the rules of Denali Park into a buffer zone would be a further help to preserving this species. I believe that it is the duty of the Board to conserve, and Proposal 142 would fall into that category.
Submitted By
  Carol Allison
Submitted On
  2/2/2017 2:33:35 PM
Affiliation

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Address
  94 hwy. 69
  Hillside, Colorado 81232

My daughter saw Denali wolves several years ago. I would go to Alaska to see them also, but I would not travel so far for any other reason. Colorado has its own beauty, but was not intelligent enough to protect its wolves and, sadly, has none. I hope Alaska will protect its wolves for all the people in the States who would love to get to see them. Carol Allison.
Arctic Audubon believes wolves should be protected in GMU 2 adjacent to Denali National Park. Please pass Proposal 142. Thanks you.
I support a ban on wolf hunting along the Denali National Park and Preserve boundary, and for the establishment of a buffer zone to protect those packs that reside within or migrate into the Park. I support the ban and buffer because our local tourism revenue, upon which this community depends, is directly tied to quality of experience for visitors. The fact that wolf sightings are down significantly over the past several years, I feel we should do our best to ensure survival of these packs in and immediately adjacent to the Park. There is plenty of land in Alaska to hunt wolves; we don’t need to do so in a way where the wishes of the few far out-weight the needs of many, many others.

David L. Arnold
As a potential visitor to Denali, one of the main draws is the possibility to see wolves in their natural habitat. Establishing a no-hunting buffer around the park will help safeguard the wolves and maintain their natural habitat. We can draw on a map, but the wolves go where they will. We should make sure they are protected, not just for visitors like me, but for the benefit of all.

Thank you for your consideration.
To Whom It May Concern:
I am appalled and devastated to learn that the Alaska Wolf -East Fork Pack will inevitably vanish or has vanished due to legal hunting allowed by your board. How can you give these hunters the right to destroy these defenseless creatures who you know very well remain endangered? Can you not see that our children's children will never have the opportunity to see these majestic creatures alive again! It is not, as a human being your moral and ethical right to decide who or what to keep alive, it is not your right. I know the bottom line to all of this is money and those invisible strings being pulled that we the public may never see or know. Whatever your intentions please think what you have done to this species and many others not just now, but since the beginning of time. Do you understand the void and destruction you will cause not just for Alaska but for the world. What will your legacy be? Please stop this killing for the future of our children and our planet.
Thank you,
Evelynn Bajana
I support Proposal 142 to ensure a trapping/hunting free zone adjacent to Denali National Park. Please ensure that this safety zone is provided. I am particularly concerned about wolves and their safety in and near Denali.
To Whom It May Concern,

I am writing today in support of Proposal 142. I believe this proposal is vital to protecting the already vulnerable population of wolves in Denali National Park. It is important to maintain diverse animal populations in the park and for the regional and state economy. Please support Proposal 142.

Sincerely,

Emilio Barrientos
Our Family of four, traveled to Denali National Park this past summer from Boston, MA because of the intact, diverse animal populations we could find here and nowhere else. The importance of Denali’s wolves to tourism cannot be overstated. In addition to the revenue this adds to your state’s economy, please consider the importance of keeping what makes Alaska different from the rest of our country, a place where people can come and find intact natural ecosystems. Please remember Denali National Park is your state’s treasure.
I am writing to urge your support of Proposal 142 to preclude hunting and trapping of wolves on distinct areas of state land adjacent to Denali National Park and Preserve, game management units 20A and 20C. As a visitor to Denali National Park I have had the awe-inspiring privilege to see a wolf. Nothing stirs the heart and soul more than seeing this regal, beautiful wild animal at home in the wilderness, untouched by human interference. With record low numbers of wolf populations, it was amazing that I was able to have that experience. We should do everything we can to ensure that the wolves can multiply so that more people can have the powerful and meaningful experience of seeing and hearing them. More importantly, we have a responsibility to keep Alaska as wild as possible so that there is at least one place in America where the animals are more important than people. Thank you for your consideration.
To members of the Board of Game,

I urge you to support Proposal 142 to protect wolves in the former buffer zone known as the Stampede corridor (also called the wolf townships), adjacent to Denali National Park (DNP).

About half a million tourists visit DNP each year; wolves rank among the top wildlife species they hope to view. Not all of these tourists are "come-from-aways"; approximately 50,000 are Alaska residents.

Recognizing the importance of wolves to the ecosystem and tourists, the board of game (BOG) created the no-take buffer zone in 2002, helping conserve wolves that den in the park during summer and follow migrating prey beyond the park boundary in winter.

The buffer zone was allowed by BOG to sunset in 2010. Since then, numbers of tourists viewing wolves in DNP has declined from 45% to around 5%. One trapper in particular touts his ability to destroy viewing opportunities for hundreds of thousands of tourists (see National Geographic Magazine, February 2016 "How Can 6 Million Acres at Denali Still Not Be Enough?").

In a state with declining oil revenues, it seems unconscionable to support this situation. Governor Bill Walker spoke on "Alaska Live" on radio today (January 31, 2017) soliciting ideas for diversifying our economy and boosting tourism in the face of our recent economic woes.

By providing opportunities to view predators in their natural habitat, we can help the tourism sector of our economy remain healthy in this most visited National Park in Alaska.

The alternative is for tourists to get the message that if they want to see wildlife in all its complexities - predator and prey alike, they should visit Yellowstone National Park because such experiences are lacking in Alaska's "Crown Jewel of the North".

Sincerely,

Maria Berger
Wildlife Biologist
Naturalist Guide in Denali National Park, 1994-2013

Sent from my iPad
I am deeply disturbed by how often the rights of our natural world are neglected, and have great fear as we move forward into the future. We, as people, hold a tremendous responsibility to protect the wild and all the creatures in it. Not for the mere sake of our own enjoyment, but for the respect and rights of all life. We hold the responsibility to assist the wolves of Denali in their survival. This means the support of all possible laws which aim to protect the wild animals of Alaska, and this nation. Alaska, above all, is a state indebted to its natural beauty, and should uphold these considerations. I was born in this beautiful state, and as someone representing the younger generation, I want say we must protect our home, and the homes of all creatures in Alaska. I support proposal 142, and I strongly urge you to do the same. Thank you for your consideration.
Hello Board of Game officials,

I live within the no-wolf-take zone described as part of Proposal 142 and I am in favor of enacting it. This proposal makes a lot of economic sense for us. You wouldn’t believe the number of times I’ve heard people say "oh, I’m headed to Denali," and I ask them, what do you want to do there? In the winter, they’re coming here to see the northern lights. But in the summer, it's almost always, "I want to see wildlife," and usually they’re most excited to see wolves and bears. This Borough thrives on tourism dollars and I want to see a decision made by the Board of Game that benefits our local economy.

The experience of witnessing a wolf in the wild is a life-changing experience - I don't think I'll ever shed the memory of huge orange eyes looking right back into mine. But it's something I have done only once, despite spending more than 75 nights out in the backcountry areas around McKinley Village, the Yanert, and within the park over the last eight years. It is apparent from the research summarized in the proposal that about 11% of the wolves in eastern Denali packs were harvested in the Wolf Townships in 2015. At such a rate, I wonder how long they’ll last. Therefore, I agree that if GMU 20A and 20C are within natural wintering ranges of these animals, they should be taken seriously for further protection. Encouraging take in this area seems far too impactful. I really don’t want people to lose the chance to experience an amazing aspect of the place I live. And, selfishly, I want a second chance, myself.

Thanks for your time and public service. I recognize that these decisions are complex and take a considerable amount of effort to decide on. Please consider my local voice in your deliberations.

Davyd Betchkal
To the Alaska Board of Game,

I support proposal 142 that establishes a no hunting and trapping buffer adjacent to Denali National Park. One of my peak experiences with wildlife was a day in the park with a whole group of family and friends when a wild wolf trotted by, and experience that was priceless. Wolves belong in the park and because of their large home ranges and migratory routes, packs can be decimated by hunting and trapping close to the park borders.

Thank you,

Julia Bevins
Alaska BOG:

Thank you for considering my comment on this important subject.

Studies conducted by eminent biologists (Murie, Haber, Mech, Ripple and countless others, I'm sure) have shown that wolves have inhabited Denali National Park and interior Alaska for at least a thousand years. The work of a handful of hunters, trappers and predator control programs have dismantled the right for wolves to live, and park visitors to view them in their natural habitat, in a matter of decades. In doing so, we as a people have demonstrated our ability to dominate the wilderness instead of live in it.

Not only have we surrendered our synergy with wilderness, but we have also surrendered the "Wilderness Idea" as Wallace Stegner put it. This is the idea that human beings can live with other creatures without destroying them, that we can assign value to wilderness beyond their economic uses, that we as people benefit from wilderness even if for ten years we never set foot in it, simply because it is there, for the sanity it brings and knowledge that there is still perhaps something left untamed on Earth. We need wilderness as much as wilderness needs us, and we cannot have wilderness in parts. It exists only in whole with minimal human disturbance. When one species is eradicated, the entire ecosystem is imbalanced.

Trophic cascade is highly pertinent to ecosystems inhabited by wolves; the studies conducted in Yellowstone over the past 15 years have demonstrated this. They show us that animals are best managed by themselves, devoid of human involvement and most especially devoid of archaic predator control programs that were invalidated as effective strategies several decades ago. There is no scientific basis for contemporary wolf control programs. Studies have shown, for example, ("The Case Against Wolf and Bear Control In Alaska" Haber, 2006) that wolves have negligible effects on moose, caribou, and sheep populations in Alaska and most often prey on the weakest animals — half the time not hunting but scavenging on carcasses from animals aged, diseased, or weakened by harsh winters. There are high biological, scientific, and ethical costs of killing wolves (ibid.). By establishing a no hunting/trapping buffer adjacent to Denali National Park where wolves often travel and den, wolves can better serve the ecosystems they are entitled to inhabit, park visitors can enjoy them, and the "Wilderness Idea" may be upheld. Alaskans can do better.

We can live with wolves, enjoy them, and respect ourselves and appreciate life more fully. We can do this simply because of the knowledge that wolves exist and that we had a choice to exterminate them, again, and didn't.

Thank you for taking the time to read my comment.
Submitted By
Harry Blair
Submitted On
2/2/2017 12:07:08 PM
Affiliation
Alaska Tours, Anchorage

Phone
907-277-3000
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600 Barrow Street, suite 200
admin@alaskatours.com
anchorage, Alaska 99501

The Alaska Board of Game PLEASE support Proposal 142 to establish a no hunting/trapping buffer adjacent to Denali National Park.

Gone forever. World-famous wolf family of Denali National Park taken for trophy to satisfy a few. Wolf populations have been in decline at Denali for the last six years, but restoring wildlife conservation easement in one key region can help these majestic animals rebound.

URGENT: Deadline to take action is TODAY: Ask The Alaska Board of Game to support Proposal 142 to establish a no hunting/trapping buffer adjacent to Denali National Park. >> [http://bit.ly/1jIDGi](http://bit.ly/1jIDGi)
During my first visit to Yellowstone I had the pleasure of watching the Lamar Valley wolf pack wake up one morning from my car parked by NPS employee on a ridge overlooking the valley. That morning will remain with me the rest of my life.

I am sure all of you know the story of how Yellowstone became a "cow pasture" (my definition) when wolves were eliminated. Once returned they kept the elk and bison from living on the stream banks and willow trees and other vegetation were able to return followed quickly by other wildlife (beaver, mink, fish, etc) that had disappeared due to no stream bank vegetation.

I am reading where I will no longer have a realistic chance to see a Denali wolf. I hope you will make every effort to keep Denali National Park from becoming a "cow pasture" and support a healthy Denali which means a healthy wolf population.

Sam Booher
I would like to lend my support to proposal 142. I have worked in the Denali area for 38 years, and have lived there year round for the last 19 years. More importantly I have been a bus driver in Denali for the past 22 summers, driving over 1000 hours per summer, and know the dynamic of the park as well as anyone. There is no doubt that I have witnessed a precipitous decline in wolf observations for the last four years. As in one or two sightings per summer recently. It is obvious to me that the wolves need to have protected status adjoining the National Park on state lands back to where it used to be not so long ago.

I urge you to do the right thing and pass proposal 142. Thank you for your consideration.

Sincerely...Gary Borenstein
Submitted By
Juliette Boselli
Submitted On
1/29/2017 7:38:12 PM
Affiliation

Phone
9076870176
Email
Julietteboselli@yahoo.com
Address
  Po box 106
  Denali, Alaska 99755

I am writing in support of protection for Denali wolves on state land outside the boundary of Denali National park. Too many wolves who have wandered outside the boundaries of the park have been killed in traps and by hunters on adjacent state Lands. Packs have been decimated and populations reduced. These wolves are a world class attraction and an important resource. The intact ecosystem of Denali is also compromised by the killing of these wolves otherwise protected within the boundaries of the park. I urge the board of game to further protect these wolves on state lands, it is the only right and just thing to do.
Greetings,

I am writing to you to express my support for Proposal 142, which would provide protection for Denali area wolves.

Though I now call Seward home, I was a Healy and Denali Park resident for many years, starting in the early 1990's. I worked as a guide in the Park and was fortunate enough show wolves to literally thousands of people over many years. I assure you that for many Alaska visitors, seeing a wolf in the wild -- a wild wolf! -- was both the highlight of their visit and a dream come true. Their interest and appreciation always grew as I explained that the first ever biological studies of wolves happened in Denali, and that they had been studied continuously since 1939, providing unique and valuable scientific data unparalleled in the world. They were awed that they were seeing the descendants of the very wolves first studied by the legendary wildlife biologist, Adolph Murie.

It's well known that in recent years, Denali wolves have suffered greatly as a result of hunting and trapping along the Park boundary, and their numbers have plummeted almost certainly due to this activity. As a longtime Alaskan, I support hunting and see it as one of the most basic ingredients of an enjoyable life in the Alaska. However, I also believe in balance, and in the name of balance and fairness, there is a clear choice to be made here.

When a wolf is killed in the area under consideration, one person benefits, and thousands of people are deprived -- not only our visitors who come here hoping just to see a wolf, but also the scientific community who understand the value of a continuously- studied population of wolves. Not to mention future generations who benefit from this knowledge.

I ask the Board to exercise it's clear authority over this area, and to exercise it's responsibility to protect wildlife in need of protection. Approve Proposal 142. Remember, when a Denali wolf dies, 1 man benefits, and thousands are deprived. Please vote for balance.

Sincerely,

Michael J Boyce
Submitted By
George Brady
Submitted On
1/29/2017 8:52:45 PM
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Camp Denali and North Face Lodge
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Address
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Fairbanks , Alaska 99709

We have entered a new age where the worth of our resources goes well beyond their face value. A wolf is a perfect example of this. As one of the few naturalist guides in denali national park, I meet people from all over the world, and even from within our state, that bring incredible amounts of revenue and wonder to Alaska. Many of these people come with the sole purpose of wanting to see wolves in the wild. In 2008 visitors spent over $150 million on their visits to Denali, and tourism is what drives the entire Denali Borough economy (https://www.nps.gov/dena/learn/nature/upload/EconomicImpacts_2012.pdf).

Since there are only select areas where most people have any chance of seeing a wild wolf, it is crucial for us to do what is in our power to protect packs and their habitats in these accessible areas. Yes, historically we have been able to hunt in these areas, but we must be willing to change and consider the needs and desires of those who will be here after our lifetimes. Can you imagine an interior, or anywhere for that matter, where it's IMPOSSIBLE to see wolves? Don't you want your kid's kids to have that experience?

George Duke Brady
Submitted By
Tamara Braithwaite
Submitted On
2/2/2017 1:53:42 PM
Affiliation

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Address
2659 Cuba Millington Rd
Millington, Tennessee 38053

I am writing in the hopes that this board will do its duty to the wildlife in its care by eliminating the hunting and trapping of wolves in land adjacent to Denali National Park, management areas 20A and 20 C. Although there are many factors that affect wolf populations, trapping and hunting by humans also has a definite impact. With wolf numbers lower than in years past, it is essential that help is given to them.

I have visited your beautiful state twice and I am always in amazement at the beauty I see. It is so breathtaking and wondrous. My travels to Denali National Park were taken for many reasons but one of the main ones was to see a wolf. I only came as close as a footprint but even that left me thankful. Please do your part to ensure that visitors to your state can up their chances of seeing one of the most magnificent of creatures. Thank you for your time.
Submitted By
Coby Brock
Submitted On
2/3/2017 11:51:56 AM
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As a professional photographer I am strongly in favor of extending the no-hunting buffer zone around Denali National Park. I have spent over 100 days in Denali National Park. Since the buffer zone was lifted 6 years ago I have noticed significantly less wolves on my photography expeditions. People come from all over the world to Denali National Park to see nature as it should be but I feel that they are getting ripped off by hunting too close to the park. They spend millions of dollars in hotels, bus trips and park fees and they should be able to see wolves in their natural habitat. I also feel that the Judas collar program that the state uses is sick and disgusting unethical and shameful. I am so angry every time that I see a collared animal in the park. As a pro photographer, collars cost me money. It is impossible to sell a photo of a moose, caribou or wolf that has a tracking collar. With fur prices at a near all time low I can assure you that more money is being lost by allowing hunting of wolves close to the park that will ever be gained. I would guess that over my career collars and trapping near the park have cost me over 5,000 in sales. When I was camping there this summer I was speaking around the campfire with a pro photographer from Switzerland and even they knew about the buffer zone issues and they were furious about it they claimed that they had driven all over the state and barely found any wildlife to photograph along the Denali Highway due to hunting. People around the world are taking notice. Denali National Park brings in millions of dollars of years. Wolves are easily my top-5 best selling pictures because tourists are not seeing them in the wild. I haven't seen a wolf in Denali in years. The buffer zone will keep tourists coming back, and provide everyone an opportunity (including the 85% of Alaskans who don't hunt) to see wolves. Right now, the State is only benefiting the few hunters and trappers who live right outside the park.
I visited beautiful Alaska last summer and want to return often. I support increased protection for wolves through Proposal 142. These magnificent creatures are important for the environment and tourism. Please help the wolves.
I am writing to voice my support of the proposal to prohibit the taking of wolves in the Stampede Corridor / Wolf Townships on the northeast corner of Denali National Park. I worked in Denali National Park as an interpretive guide for five summers between 2009-2014 and spent many hours watching the Grant Creek Pack. I witnessed myself the dramatic declines in wolf encounters that followed the opening of trapping along the Stampede Corridor. As a guide, I was keenly aware of the excitement visitors had to see wolves in such a wild landscape, as well as their disappointment when viewing wolves became an almost-never-happens event. The causal link between wolf takes and reduced visitor encounters in the Park appears robust and supported. I sincerely hope the protections are reinstated.
As a hunter, lover of Denali Park, and an Alaskan worried about Alaska’s fiscal future, I implore the BOG to please support Proposal 142. Alaska’s wildlife should be managed so that our tourism industry is bolstered. That means we have to conserve those animals that bring people to our state. Hunting wolves that stray from our most cherished park - Denali - is a bad experiment. It should be ended immediately.

Denali wolves bring visitors to our state. Those tourist dollars have never been more important. Alaska has an experience to offer folks in the lower 48. We cannot allow needless hunting of the animals that draw people to Denali.

Keep Alaska’s fiscal future in mind and please support prop 142!

Thank you,

Joanna
Dear Members of the Board,

I am writing to express my support for Proposal 142 to establish a no hunting/trapping buffer zone adjacent to Denali National Park and Preserve. The BOG has historical precedent for such a buffer and has acknowledged that it considers DNPP wolves a valuable resource. As do frequent park visitors like myself. The BOG has a responsibility to wildlife viewers, who should have opportunities similar to hunters and trappers. Furthermore, the wolves of DNPP are valuable scientific subjects, which have been studied for eight decades and multiple generations - almost unprecedented in scientific circles. Wolves serve as a keystone species, acting to directly control herbivore populations, but also the myriad cascading effects on ecosystem structure and function. It is the pristine nature of Denali that attracts thousands of visitors each year - generating precious local and state revenue - that should be heavily weighted in the BOG's decision. Do the board members want to see that revenue decline if visitors decide Denali isn't worth it because the chances of spotting an iconic wolf have vanished? Please protect these wolves, their ecosystem and the sustainable source of revenue for the next generation of Alaskans and visitors from around the world.

Sean
Submitted By
  Joan Campbell
Submitted On
  2/1/2017 9:49:59 AM
Affiliation

I address these comments to the matter of Proposal 142 and strongly add my support for a ban on hunting and trapping of wolves in game management units 20A and 20C.

Alaska’s wildlife constitutes one of its greatest touristic assets and is of huge importance in attracting tourist and their dollars to the state - far more dollars than wolf-hunting licenses. To this fact is joined the fact of a recently diminished population of wolves in the Denali area, probably for a variety of reasons. It's only logical to use a conservative approach to their management, extending to them protection that goes beyond the (invisible, to them) boundaries of the National Park.

It is the Board's responsibility - and privilege - to nurture a vibrant, bio-diverse ecosystem in the Denali area, for both its intrinsic, moral value and its economic benefit to the state. For those of us in the Lower 48, the possibility of seeing a wolf during a visit to Denali is a tremendous lure, and actually seeing one (as I was lucky enough to do so a couple of years ago) a thrill that draws us back time and again.

Thank you for taking your obligation to the state and its wildlife seriously, and giving this matter careful consideration.
Submitted By
Larry Casey
Submitted On
2/2/2017 10:58:58 AM
Affiliation
1952

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icsteelhead@gmail.com
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12428 Winter Park Circle
Eagle River, Alaska 99577

I support proposal 142 to help protect wolves.

I have little hope that the board will act in a responsible manner as apparently slaughtering predators is a mandate.

This life long hunter and 30+ year Alaska residents finds the Board of Game seriously out of touch in managing game.

Thank You
Hello,

Two summers ago my husband and I made our first trip to the stunning state of Alaska. The highlight of our trip was a 3-night stay at Camp Denali, where on one excursion we witnessed a pack of wolves with cubs. The guide was quite excited and said how unusual it was to see a full pack, that the wolf population had diminished greatly in recent years, and earlier in the season one of the few adult females of breeding age was trapped and killed very near, but outside, the boundaries of the protected area of the park. The death of this female endangered her offspring, who likely did not survive. I thought at the time how tragic and senseless this slaying was.

I sincerely urge you to support Proposal 142 to secure the future wolf population and help ensure this tragic end doesn't befall another breeding female - or any wolf who ventures beyond the territory of the Park.

My husband and I look forward to a return visit to Camp Denali and next time we will bring our entire family. But, we will look to this vote to see if the Alaska Board of Game takes the necessary steps to preserve the wildlife in the region. Though the scenery in your grand state is breathtaking, it is the wildlife that inspires us to cross the country to visit and spend our tourist dollars in Alaska, instead of elsewhere in the country or in Canada.

Please protect the wolves in Denali and support Proposal 142.

Catherine C. Cave

West Stockbridge, MA
Support proposal 142

There is a precedent for a no hunting/trapping area in the Stampede Corridor/Nenana Canyon. The buffer zone needs to be reinstated. The BOG has both the authority and the responsibility to manage wildlife for conservation purposes. A majority of Alaskans support creation of a buffer to protect wolves in this small but critically important area. Park boundaries are a fictional line drawn around an area of land; wildlife neither know about or respects an arbitrary line. The old buffer zone more closely resembled natural boundaries and should be reinstated.

The state of Alaska's wildlife management should cease the war on predators, particularly the aspects in place at the behest of a tiny minority of the state's population.
I would like to submit comment concerning proposal 142. Having been a business owner who has transported park visitors over the Denali Park road to our lodges in the center of the park for nearly forty years, I know first-hand that observing a wolf in the wild is one of visitors’ three greatest aspirations.

Wolves that den inside Denali National Park near its northeast boundary risk hunting and trapping when moving onto state land. The Alaska Board of Game has responsibility for and authority to provide for conservation of state land outside the park boundary. Indeed, acknowledging that the park wolves were a valuable resource for visitors, in 2001 and 2002 the Board of Game approved no-take closed areas (Stampede and Nenana Canyon) adjacent to the park when the wolf population was double the current number. This idea made economic sense then as it does now and it fulfills ADF&G’s management goals. I support added protection for wolves as outlined in proposal 142 on lands in GMU 20 adjacent to Denali National Park.

Jerryne Cole
Prop 142. Please support the protection area for wolves. Their social structure depends on a dominant leader of the pack and that loss leads to the death of many. They are vital to the ecology and balance of this endangered environment. There are great financial benefits to the state from tourism as well as what I would call a moral responsibility to conservative this portion of the earth.
Dear Board Members,

Last June I came to Alaska for the first time with a journalist. I had wanted to visit for a very long time but one thing that worried me was my pre-conceived notion that all locals loved to kill anything on four legs and that I would be regarded as a ‘tree hugger’ which seems to be the normal label for anyone that isn’t into hunting. Instead I met local people who love and want to protect wildlife and keep the ecology chain moving.

I am from the UK where the tragedy still rings in people’s minds that the last wolf was shot in Scotland a long time ago. People like me come to places like Alaska in the hope that we will spot a wolf in the wild. Getting to your state is easy now via Iceland. They in turn are expanding their airport to create one of the biggest hubs from Europe to North America. Tourism is on the up. People want to see expansive landscapes, mountains and most of all wildlife. You have it.

I was very lucky to stay in several of your National Parks including Denali. I couldn’t have wished for a better experience. The mountain herself appeared in all her glory, the bears and moose were enjoying the sunshine and everything was perfect. One of our guides gave a talk about the dwindling wolf population and how hunters wait outside the Park boundary to shoot any wolf that strays over. This was very upsetting and left a stain on an otherwise perfect holiday.

I am therefore pleading as a tourist and believer that the welfare of natural predators maintains the balance in nature that you consider stopping the issue of hunting licences for the areas adjacent to the Park.

Wolves may disappear totally if hunting is allowed in this area. Please consider how this will affect tourism.

Alaska is a beautiful natural land. Please keep it that way.

Thank You.
As we find ourselves in pivotal and often uncertain times in landscapes both figurative and literal, we look to Alaska as a bastion of the wildness, freedom and purity we vigorously seek yet so often struggle to find. For those of us that truly value these qualities as part of a life fulfilled, the wolf is truly an epitome. My own yearning for an experience so impactful as simply observing a wolf in its habitat is only outweighed by that of its preservation for generations to come. This is why I wholeheartedly support Proposal 142 - what we do at this moment will resound for years to come with those who need it most and otherwise couldn't.
I am writing in support of Proposal 142. As a visitor to Denali NP, I personally experienced the presence of the wolf population and can attest to the value of that experience in helping me and other visitors understand the interrelationship of species in the Denali ecosystem. I urge the Alaska Board of Game to exercise its responsibility and authority to conserve the wilderness and wildlife to preclude hunting and trapping of wolves on state land adjacent to Denali NP and Preserve. This action is key to reducing the vulnerability of wolves to hunting and trapping when they cross the park boundary onto state land, providing protection in the larger Denali ecosystem, and recognizing the critical importance of intact, diverse animal populations to the regional and state economy. The long term interests of the state and its human population are inextricably tied to the health of our natural environment and all its diversity. Thank you.
I support proposal 142 to establish a no hunting/trapping buffer adjacent to Denali National Park. The board has the responsibility to manage wildlife conservation purposes. These wolves that frequent the Corridor/ Nenana/ Park Road are an extremely important scientific resource to some of the most famous and longest running studies of wolf packs in the country. These hunting activities will ultimately result in the loss of entire packs and prematurely end the decades of scientific research. Also, visitors to Denali want to see wolves and spend much of their income on the experience. This will result in losses for Alaskan tourism and present a poor look on Alaska’s tourism industry. As documented by the National Parks Service in 2015 today only 4% of visitors will see a wolf alongside Park Road and before the buffer was scrapped in 2010 nearly 50% saw a wolf. Please consider these and many additional points to establish a no hunting and trapping buffer adjacent to Denali National Park.
I write in support of Proposal 142 which would establish a no-wolf-take zone in a small portion of GMU 20, subunits 20A and 20C, adjacent to Denali National Park.

While I am not an Alaskan resident, I have visited Alaska 11 times in the past, have spent substantial time and money in Alaska on guided and also unguided fishing and backpacking trips in the state and intend to visit Alaska multiple times in the future. I have visited Denali National Park four times and have stayed at Camp Denali and have also backpacked and day hiked on my own in the park. I have seen wolves in the park on three occasions and have heard wolves calling in the park while backpacking. These experiences were among the highlights of those particular trips and I can assure you that the experience of seeing and hearing wolves in the park is significant and meaningful to visitors and also is a contributing motivation for return and repeat trips. It certainly has been for me, for my wife and for my brother (who have accompanied me on some of these trips).

I believe that Alaska would be well served by providing protection to wolves on state lands adjoining the Park. Wolves of course do not know about Park boundaries and are particularly vulnerable when they cross over out of the Park since they are used to humans not being a threat (in the Park). While I admittedly have no data, it seems highly likely to me that the economic benefit of added tourism and spending in the state accruing due to protection of wolves in the limited area adjoining Denali would far outweigh any economic benefit of wolf take in GMU 20. In my case, on every trip I have taken to Alaska I spent in the region of $5,000 to $15,000 in Alaska. Considering the large number of visitors to Denali, and the fact that most of those visitors also visit and spend money in other regions of Alaska before or after they visit Denali, the economic case for Proposal 142 seems self-evident since clearly the value of the presence of wolves in the Park is on the order of many millions, perhaps tens of millions of dollars of tourism revenue to the state. There is of course also the fact that the Board of Game has the responsibility and duty to conserve the wilderness and wildlife in GMU 20.

Thank you for your kind consideration.

Very truly yours,

Ken Crowell
In support of Proposal 142:

I have been a landowner in the Wolf Townships 30 miles west of Healy since 1976. My property borders Denali National Park and I have witnessed the rise and fall of the wolf population along the northern boundary for over 40 years. The absence of wolf activity over the last decade has been dramatic and alarming. In past decades, consistent sightings of individuals and families were commonplace, along with their auditory presence in the valley. Now and for the last number of years there’s greatly reduced signs of activity.

The loss of this resource leaves an empty rung in the natural habitat of the area and impacts the experience of anyone who visits. This imbalance in diversity ripples out to the rest of the ecosystem with effects that are beyond our complete understanding but far-reaching in scope. And the impact on the local economy that depends on tourist’s sightings of wolves in the wild (that can be found in a few other parts of the country) is a loss to anyone who travels to Alaska to experience Denali National Park.

The Denali wolves don’t know when they cross that invisible northeastern boundary and leave their safe sanctuary. They don’t know that they may never return to their families or to the interior of the park where they have made their home. The Alaska Board of Game has the authority to rectify this situation and restore a more balanced management plan governing this area. I sincerely hope this issue is taken seriously and that the necessary steps are taken to protect our wild wolf population before it’s too late.

Signed, Stewart Cubley
SUPPORT PROPOSAL 142

Wolves must be protected from trapping and hunting in this area around Denali Park. Visitors and residents of Alaska want this protection so they can view wolves in the wild. This is important for our economy and is very important for a healthy ecosystem. Wolf numbers have greatly decreased and packs have been wiped out by a few trappers, who knowingly trap this area as they know the habits of the wolves in Denali. Alaskans overwhelmingly want this area protected. Please pass this proposal for all of us and the ecosystem. Let’s get out of the dark ages and protect this keystone species.

Thank you for the opportunity to comment.
Please re-instate the Denali National Park "Buffer Zone."

Please consider the statistics and benefit to American's. In 2010 45% of visitors to Denali National Park had the opportunity to see a wolf. Now visitors have a 5% chance. How many people benefit from a wolf killed in the buffer zone? What is the economic benefit of that one wolf? The death of a wolf especially an Alpha wolf can destroy the pack vs. the benefit to one person, is it worth it?

Please listen to the majority of Alaskan's who would rather see these wolves alive than dead. It is your job to consider the science, statistics, and the wishes of ALL Alaskan's.

Thank you for your consideration,

Michelle Dalpes
I support Proposal 142 to establish a No Hunting/Trapping buffer adjacent to Denali National Park.

The economic rewards of insuring there are wolves in Denali for tourists to see has been well documented. The majority of Alaskans support a buffer zone. As a committee entirely of trappers and hunters, you have a democratic responsibility to represent the majority viewpoint. There is wise precedent for a no hunting/no trapping area in the Stampede Corridor/Nenana Canyon. And the 2001-02 BOG acknowledged Denali wolves as an important resource and worth conserving. Setting up the buffer is a small and democratic gesture. The Denali wolf population has greatly declined. Denali visitors now have a 4% chance of seeing a wolf. Because you are governor-appointed and charged with representing Alaskans who prefer non consumptive wildlife uses, thank you for passing this Proposal 142.
Please support Proposal 142! It is unconscionable to allow a few Alaskans to trap and kill wolves that so many Alaskans, Americans, and others want to see. Now, more than ever, we need tourist dollars and tourists pay to see wolves. Your removal of the buffer has caused visitors seeing wolves in DNP from 50% in 2010 to just 4% now. That, plus news that you allow DNP wolves to be trapped and killed, will only decrease the number of tourists and the income to this state further. And for what -- so a few people can kill wolves. That is complete BS. These wolves are also very important to science as they are some of the most studied in the world and continuance thereof is critical to better understand wolves. Plus, the vast majority of Alaskans support the buffer. Do your job for who you are supposed to -- all Alaskans, not just a few select Alaskans. Support Proposal 142 and re-establish the buffer!!!
Thank you for the opportunity to comment on proposals for the upcoming Region III Board of Game meeting. The Denali Citizens Council, headquartered near Denali National Park, submits the following comments.

**Proposal 142 – Area closed to wolf hunting and trapping adjacent to Denali National Park – Support**

We urge the Board of Game to pass this proposal as a way to acknowledge the significance of wolf populations that den inside Denali Park and venture predictably onto state lands nearby. These wolves’ movements have been studied since the 1980s, and a pattern of in and out migration is well known. Radiolocation maps over the past many years place the bulk of these movements within the wolf or stampede townships, a cut out of state land on the northeast boundary. Radiolocations also show that wolves spill over into the valley of the Nenana River Canyon specifically and predictably.

Because we have spoken before the board of game in the past, and have heard members of the board and public express certain concerns about protecting wolves who den in the park when on state lands nearby, we’d like to address the concerns in the points below.

1. **Concern: Protecting Denali wolves is not the job of the Board of Game. The national park is already big enough.**

Conservation of wolves is not only a core value of the national park, it is one of the state’s many management goals for this species in Alaska. The Department of Fish and Game, in its 2011 management document on wolves, stated that “Management may include both the manipulation of wolf population size and total protection of wolves from human influence.” The job of the board of game is broad under AS 16.05.255, and includes conservation of any species. Finally, the Board of Game has already exercised this authority, within the past two decades, by previously establishing no take areas for wolves adjacent to Denali National Park.

2. **Concern: Protecting wolves in Units 20A and 20C violates intensive management stipulations.**

Neither of the areas included in Proposal 142 have been identified by the state or board as authorized for intensive management activities at this time.

3. **Concern: Wolf populations are not endangered in Units 20C and 20A next to the park.**

It is not necessary to have a finding of “endangerment” to protect wolves in these areas, if the Board of Game finds that their viability is important for Alaska tourism and scientific study. It is true, however, that wolf numbers have been quite low throughout Unit 20C, and a census conducted in 2012 by the Department found a density of 10.7/1000mi2, below the department’s management floor of 11/1000mi2. Despite this finding, however, the Board of Game increased the hunting bag limit for wolves from 5-10 at its 2014 Interior Region meeting.

4. **Concern: Wolves die from other causes; mortality from hunting and trapping is a small portion of this loss**

The department has stated that, according to its best estimate, approximately 4-6 wolves are taken in this general area per year through hunting and trapping. The population of wolves in Unit 20C has been low for several years, and there are no doubt multiple sources of mortality. There is little data from the department on fall to spring census numbers, but data from the National Park Service indicate a loss, from 2012-2015, of approximately 10 wolves per winter, on average (based on the difference between fall and spring census). This means that hunting/trapping take could be significant, up to 50% of the take. In addition, take after early February, by either trapping or hunting, can have a greater effect on wolf packs through the death of breeders. The disruption of packs that den in the eastern portions of the national park, where forays onto state lands are more documented, has been greater, as evidenced by the demise of the East Fork Pack.

5. **Concern: The Board of Game took care of hunting pressure in 2016 by shortening the wolf hunting season in a portion of Unit 20C, to end on April 15th.**

Although this change will certainly prevent the hunting of wolves when bear bait stations are active, it will not ultimately be enough to promote conservation of wolves in this area. We have questioned the regional biologist for this area, and he says that by far trapping is the method by which most wolves are taken in the area. Because of the relatively low population of wolves and the proportionately large take that data suggest is coming from hunting and trapping, we argue that more robust closures are needed.

Ultimately, a closure of state lands adjacent to Denali National Park, for purposes of **reducing risks** on a population of wolves that dens in the park and ventures predictably outside the park, will not be made from the standpoint of the species endangerment of these wolves. Instead, it will be made by a Board of Game that recognizes three things:

- The opinion of many Alaskans in support of this closure.
- The importance of reducing risks to this discreet population, in order to protect an economically and scientifically valuable Alaskan resource.
- The absolute authority and responsibility held by the Board of Game, and exercised in the past, to act on this issue.

Thank you for the opportunity to comment.
I SUPPORT PROPOSAL 142 TO ESTABLISH A NO HUNTING/TRAPPING BUFFER ADJACENT TO DENALI NATIONAL PARK. Animals do not recognize human political/management boundaries. It makes little sense to allow the high economic value of wolves in Denali National Park to be essentially exterminated as soon as they cross the park boundary by just three or four trappers. I would personally contribute to a fund to pay the trappers fair market value for the number of wolves they have historically trapped if the Board of Game would establish a no hunting/trapping buffer in the Denali wolves' normal range outside the park boundary. A majority of Alaskans support creation of such a buffer to protect wolves in this small but critically important area.

I also agree with the many other reasons people have expressed in support of this buffer. The wolves are much more valuable to the Alaska economy alive than dead.

Please support Proposal 142. Thank you for your consideration.
PROPOSAL 142: Support to establish hunting and trapping adjacent to Denali National Park and Preserve.

There are very few places in the world where people can travel to and see wolves in the wild. This is a critical aspect to visitors to Alaska and Denali in particular - the chance to see a wolf in the wild. It may be difficult to put a dollar-value to the tourism that this adds to Alaska, however, I would be quite certain that the wolves that are trapped or hunted in the buffer area in question would bring in dollar-value to the state (and hence, ultimately the Alaska public). On a strictly monetary value, the establishment of a buffer area is the correct fiscal choice.

There are other places in Alaska besides a piece of land that is adjacent one of the US public's most respected national parks/preserves - and that respect and interest and support comes mainly from the variety of wildlife that can no be seen anywhere else in a national park in the US. Yes, some trappers and hunters will be inconvenienced if this buffer is established, but can the weight of a small group of people outweigh the the people across the nation who value this park, and would chose to see the Denali wolves protected.

Wolves of Denali have been studied for decades. There is a long history and scientific tradition of understanding wolves by studying the Denali wolves. The lack of a buffer affects the most natural size and behavior of the wolf pack in question. This in turn affects the scientific research and can make the valuable data difficult to compare over decades as wolves are taken by hunting and trapping.

I imagine there are many other reasons to establish this buffer, but these two concerns alone - the dollar-value return to the state of Alaska, and the scientific value of this pack having a buffer - are very strong reasons to establish this buffer under this proposal 142.
I write you support of proposal 142, the wolf buffer by Denali Park. I have lived in Alaska for 25 years. For 15 of those years I lived near Healy. I worked inside Denali National Park for many years and saw the ebb and flow of wolf sightings. I also saw how important it was for visitors to see just one live wolf. Many people come to Alaska just to see a bear, others just want to see Denali. But there are many that hope to see a wolf, just one. And most times the only place that will happen is in Denali. Most visitors don't get off the road system, so Denali is it.

For years ADF&G was just about the hunters and trappers and the science of game management. As our state goes broke, it will be more and more about tourism. Millions flock to Alaska to fish, to hunt, to sightsee. The price of a live wolf is much higher than a dead one. I know others are covering the issue of diversity of species and importance of preservation. I really think there is a tipping point. We are close to it. I think the numbers show the importance of ‘no take’ of wolves for awhile. Please support proposal 142.
Submitted By
kay dorie
Submitted On
2/2/2017 6:01:05 PM
Affiliation

I have been to Alaska as a visitor and the highlight of my trip was to see a wild wolf loping across the frozen Tanana River. I am hoping to return, and seeing another wolf is at the very top of my wish list. I hope you will not allow short-sighted special interests to destroy the animals that thousands of us in the Lower 48 come to see. I also would be reluctant to contribute my tourist dollars to a state government that will not protect at-risk wildlife and their necessary habitats in this day and age.
Support Proposal 142

I strongly support Proposal 142 to establish a no hunting/trapping buffer adjacent to Denali National Park and Preserve. There is precedent for such an area in the Stampede Corridor/Nenana Canyon. It is my understanding that the Board acknowledged in 2001-02 that the park wolves are a valuable resource for visitors such as myself, and therefore set aside areas closed to hunting. At that time the park’s wolf population was 97 wolves, which is far greater than the current population.

A majority of Alaskans support creation of a buffer to protect wolves in this critically important area. The Board has the authority and the responsibility to manage wildlife for conservation purposes.

In addition, the wolves that frequent the Corridor/Nenana/Park Road area are an important scientific resource, as they are the subjects of the longest-running scientific studies of wolf packs in the country. Unfortunately, hunting activities that ultimately result in the loss of entire packs abruptly and prematurely end those decades of research.

Visitors to Denali such as myself are drawn there to see wolves and are willing to spend a significant amount for that opportunity. Alaska tourism is not well served in the absence of wolves, especially when it is reported that the state routinely allows wolves to be killed adjacent to the park for lack of a very limited buffer area. Millions of tourism dollars are spent in the Denali area, and the entire state for that matter, providing a boost to the Alaska economy.

The statistics speak for themselves - before the buffer was scrapped in 2010, nearly 50 percent of visitors saw a wolf. In 2015, the National Park Service documented that there is only a 4 percent chance of spotting a wolf along the Park Road.

I urge the Board to re-establish protection for the Denali wolves with a no hunting/trapping buffer adjacent to Denali National Park.
I support proposal 142 as I am worried about the vulnerability of wolves crossing the park boundary into state land. They are important both from an economic (tourism) and a scientific point of view. Tourism makes much higher revenues than hunting and trapping and it is important to keep diverse animal populations intact.

The Alaska Board of Game must take their responsibility to conserve the wilderness and wildlife in the region very seriously.
I strongly support Proposal 142. The experience in Yellowstone supports that. Having periodic kill periods to control the population makes absolutely no sense and is contrary to the entire philosophy behind Denali. I was there in August and the thing that stood out the most was the pristine, leave-mother nature-alone message that is everpresent. It's well known that leaving the population of wolves to maintain itself through natural means actually helps strengthen the other animals that serves a prey. Keeping the buffer zone in effect will help avoid human interaction with the wolves.

Please consider my comments in your deliberations.
Submitted By
JEFF EASTMEAD
Submitted On
2/1/2017 7:32:21 AM
Affiliation
NONE

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I am writing you on proposal 142 to create a buffer zone around Denali National Park where wolves cannot be hunted. I have been to Denali National Park and preserve 10 times and the being able to view and observe wild animals in their natural habitat is the reason me and my family visit frequently. Wolves are the number one animal we come to see - after wolves it would be Bears, Moose, Caribou and Dall Sheep. Last year was the first time we saw no wolves on our Fall visit to Denali. 2 years ago at the same time we saw 6 wolves all the way up to mile 19. We also saw a Pack on a ridge close to the Tokalat River. It is critical for the future of Alaska and Denali National Park that there is balance between hunting and protecting wildlife for all Alaska visitors. Please pass proposal 142 to encourage wolf protection in Denali National Park. I have many friends that come to Alaska to both observe wildlife and fish and and hunt (hunting for food not trophies mostly Moose) All agree with me that we must protect the Wildlife in Denali National Park for future generations.

Thank you for letting me voice my opinion.

Regards

Jeff Eastmead
Submitted By
Patrick Endres
Submitted On
2/2/2017 6:38:14 PM
Affiliation

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Greetings from Fairbanks, Alaska

Thank you for the opportunity to comment. I appreciate and respect that liberty. I'm a 37 year Alaska resident and have worked as a professional photographer for the past 24 years. I've been a visitor to Denali Park regularly since 1981, and photographed annually in the Park under a professional permit since 1995. I make my living from nature photography and have guided hundreds of visitors to Alaska since 1997. They come to see, to photograph and to enjoy this epic landscape. The economic benefit of wildlife viewing in this state is immense. Hundreds of thousands of people come to Denali Park to see wilderness in its raw form. Not all come specifically to see a wolf, but take a random survey and I bet every one on a Denali Park bus would love the opportunity. I strongly support doing what we can to perpetuate the experience of wildlife viewing. Those who come and see go and tell their friends and family of their experience, which is likely to bring more people to Alaska. Our state is under dire fiscal circumstances. It behooves all of us in responsible positions to make decisions that benefit the sustainability of our land and economy. Please back proposal 142.

Respectfully,

Patrick Endres
Dear Members of the Alaska Board of Game,

I write you as a 23-year Alaskan hunter, fisherman, outdoor writer, and wildlife biologist. I currently possess a permanent hunt/fish/trapping license. I am not a trapper, but I appreciate the tradition.

I'm writing in support of your reinstatement of a buffer zone to protect the Denali wolves using the habitats just north of the east end of the McKinley Park Road and extending southward along that section of the park.

The former buffer was a good idea; during those years I observed wolves—once an entire pack—from the park road on two of three visits to the park. Many Alaskans and many visitors and tourists saw what may be the only wild wolves they'd see in their lives along that stretch, from tour buses or their own vehicles. Seeing those wolves heightened the greater public good and enforced our Alaskan Constitution's requirement that "resources" (I have come to detest that word) be "developed" for the greatest good for ALL Alaskans. And some of that good is the income from tourism, the maintenance of a local pack for the Alaskan spirit and essence, and the protection of respect for Alaskan trappers and trapping. I've no truck with the trappers who benefited from the Board's removal of the old buffer, but I disagree with benefiting a few at the cost of many, including many Alaskans and Alaska's reputation. Let's put it back.

Like the trappers there, I am one among thousands who have benefited in a nonconsumptive way from the wolves who once wandered there—and I hope will again. As an outdoor writer, one of my trips into the park afforded me a view of all 11 wolves in the Grant Creek Wolf Pack back in 2007 or 2008, for a story published in Audubon magazine and which I opened with the wolf sighting. So I know first-hand the bounty—and thrill—of seeing them.

As a wildlife biologist, I've worked in Yellowstone the past four summers on a species of waterbird, work that takes me back into the Yellowstone backcountry. On one visit a few years ago, while I was behind camo trying to capture a member of the species under study, I saw a white wolf and a gray wolf come out of the timber and down to the water near me. Later, Yellowstone biologist Doug Smith would tell me they were the alpha pair of the Canyon Pack. I'd worked in Yellowstone 40 years ago, when there were no wolves about, so I know the thrill of celebrating the wolves' return.

The real issue is this: Conservationists have to band together in this modern world in order to protect the things we love. If we give a little here and there, we keep our traditions alive and protect the land and life that we know we need. The wolf—and especially the Alaskan wolf—is a symbol to most Alaskans, many Americans, and even visitors from afar, of the wild and natural world that still remains here. Let's give us all—hunters, fishermen, trappers, bird-watchers, flower and butterfly people, all of us—a good chance to see the wolves of Denali. Let's let them all know that Alaska is the place to see this and share the view.

Please reinstate a buffer in this one place,

Jeff Fair, Lazy Mountain, Alaska
Regarding Proposal 142, I support increased protection for the wolves of Denali National Park with a park buffer zone. Wolves certainly do not know there are boundary lines around a park and will wander in search of food, etc. Keeping healthy wolf populations is important for a number of reasons. They are necessary for the maintenance of a healthy ecosystem by controlling prey populations. The keep prey population healthier by culling the weak and sick. Studies in Yellowstone have shown wolves have increased the health of the wetlands and affected positively the flow of rivers and streams, thereby benefiting other species. Through all of this, ecotourism flourishes. Ecotourism brings in $5 for each $1 of hunter money, thereby improving the economy of the region. It is good for the environment and for the people who live in these wild areas. I encourage you to maintain these buffer zones and expand them.
Submitted By
Gary Feest
Submitted On
2/2/2017 9:58:58 AM
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Support Proposal 142
Visitors to the park would love to hear the howl of these majestic creatures. They don't want to hear the sound of gunfire, knowing that another sentient living being is having it's life extinguished by a human. Let nature take care of itself.
Wolves unfortunately are unable to read boundary signs and stay within areas of protection. Allowing for trapping and hunting again on state lands should not be allowed. These wolf populations are vulnerable. Existence in the Denali area is tough as it is for most wildlife. Contributing to the vulnerability of this apex predator does not bode well for maintaining a healthy, diverse ecosystem. One which tourists come to see and at a good expense.

I had the wonderful opportunity to stay in Denali National Park this past summer for four days. I was blown away by the natural beauty and the diversity of wildlife we were able to see. It surpassed my expectations, and I was touched by how unique and special this part of Alaska is. I've been to no other national park like it.

Do your part in protecting these wolves so that their populations may continue to improve and thrive and contribute to healthy, beautiful ecosystems that people will travel a very long way to visit. Denali and its gifts shouldn't end at a border.
It is extremely important to me that Proposal 142 be enacted. Wolves are an extremely important predator for the health of Denali and wild lands in North America in general. We have limited the ability of predators to manage wild lands and it is to our detriment. Many plants have disappeared along with intermediate species. This will give the wolves a chance to be outside the part without being hunted. Unfortunately, no one has yet been able to come up with a less than lethal set of instructions to tell predators where the boundaries are. Please give them a chance to make our earth a much richer place to be. Alaska is one of my favorite states and I love being a tourist there and at Denali and seeing the wonderful animals.
Submitted By
Sharon G Fisher
Submitted On
2/1/2017 6:23:16 AM
Affiliation

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I am asking the Board of Game to establish a no-wolf-take zone in a small portion of GMU 20, subunits 20A and 20C, adjacent to Denali National Park. As a wildlife photographer, being able to visit wolves within Denali is critical. The wolf population within the park and adjacent lands will be at significant risk for continued declines in numbers and viewability if the Board fails to protect them.

Reallocation of use from hunting/trapping to viewing wolves will enhance the economic benefit of this area to all Alaskans. The local and state tourism economies will benefit when visitors have an improved chance of seeing wolves. Almost thirty years of collaborative scientific study of wolf ecology in the Denali region will benefit.

Thank you for your consideration.
To Whom It May Concern,

This upcoming summer will be my fifth season working as a naturalist guide for a family owned tourism business based inside Denali National Park. Each summer (four days of every week, averaging 450 hours per summer, almost 2000 hours to date) I travel the park by road and foot with tourists who have traveled from far and wide to enjoy the natural landscape of the Denali region. Many, if not all, of these park visitors are harboring long held hopes of catching a glimpse of a wolf, that iconic animal of wilderness. Throughout the summers of 2013-2016, amongst all the hiking in the backcountry and the all day drives back and forth along the entire stretch of the park road, I have Never had a wolf sighting while with park visitors, not once. I'm certain that every member of the Board is fully aware of the vulnerability of these wolves to human predation after leaving the Denali Park boundaries (especially when crossing the Stampede Trail corridor); of the unprecedented integrity and duration of the scientific study of wolves that breed within Denali park boundaries; of the large sums of money tourists spend in Alaska pursuing their dreams of seeing a wolf in the wilds of Denali; and of the stated objective of the Board to "conserve and develop Alaska's wildlife resources." Wolves may be abundant enough to warrant legal harvest in much of Alaska, but they are not abundant in Denali National Park. I send this comment in support of Proposal 142 in an effort to protect the wolves of Denali from further harvest. Thank you for your time in considering this comment.

Sincerely,

Simon B. Fitzwilliam
I am writing to urge the BOG to adopt Proposal 142 and establish a predator trapping buffer zone in the Wolf Townships and along the eastern boundary of Denali National Park. I believe that the protection of predators in that area will enhance economic development in the area around Healy and Denali National Park. I live on Stampede Road and own property in several other locations in the Wolf Townships. During my winter travels between my properties in the Wolf Townships it has become very rare to see evidence of wolves and other predators. These animals are an economic asset for the adjacent Denali National Park and should now receive additional protection. Thank you for your consideration.
I visited Denali in August 2012 and experienced numerous "once-in-a lifetime" events (at least for me from NM, although I hope they are not really "once-in-a-lifetime").....a female moose serenely eating in Wonder Lake (with a crystal clear Denali as a backdrop), sighting of a young inquisitive caribou encircling our hiking group, and the dancing Northern Lights! But some others in our group got a chance to see a wolf! How I wished I was with them when they saw it! Please don't take that opportunity aware from me or other future visitors!

I still hope to one day re-visit Denali National Park, in hopes of seeing a wolf and much more. Thank you for your consideration of this important issue.
I write in support of Proposal 142, to provide greater protection for the "wolf townships" adjacent to Denali National Park and Preserve.

As a 3rd generation Alaskan, born and raised in Anchorage, I have been to the Park many times, the first time nearly 60 years ago.

Since my first job out of college with ADF&G, I have been a student of the biology of McKinley/Denali, and keen to enhance its protection. It was a rare opportunity to be involved in the inception of the Denali Citizens Council in the mid-70s and to go on to work for over four years in Alaska and Washington, D.C. on the Alaska National Interest Lands Conservation Act.

These townships have always been of concern to wildlife biologists and I now urge your affirmative action to adopt Proposal 142.

Thank you for your consideration, Dee Frankfourth
Support Proposal 142

Visitors to Denali want to see wolves, and they spend a lot of money for the opportunity. No wolves - or news that the state routinely allows wolves to be killed adjacent to the park for lack of a very limited buffer area - are black eyes for Alaska tourism. The millions of dollars tourism brings to the Denali area and the entire state are now, more than ever, crucial to our economy.

The Board has both the authority and the responsibility to manage wildlife for conservation purposes. A majority of Alaskans support creation of a buffer to protect wolves in this small but critically important area.

The wolves that frequent the Corridor/Nenana/Park Road area are an important scientific resource. They are the subjects of some of the most-famous, longest-running scientific studies of wolf packs in the country. Hunting activities which ultimately result in the loss of entire packs abruptly and prematurely end decades of research.

Thanks,

Marnie Gaede
Please replace my earlier comments with the following correction.

**Regarding Proposal 142**

Apparently Alaska wants to continue the trapping and hunting of the wolf population in and around Denali and Proposal 142 is set forth to limit such activities in areas near Denali National Park. I visited Denali in 2013. I had no expectation of viewing wolves at that time as the population is quite low. The only time I have seen wolves anywhere in the world is, surprisingly, in 1995 in Colorado near an interstate highway.

At wildlife preserves in Africa involving millions of acres of area one is virtually immersed in huge herds of wildlife and associated predator species that exist largely in reasonable balance within the various species as well as with the human population. We could do much better throughout America. Working diligently to restore a natural balance of wildlife throughout our country should be a goal that supplants the urge of some to kill wild life. Our hunting goals should be beautiful photos of wild life in nature and learning to coexist with wildlife. Somehow a stuffed head of a moose or bear on a wall is coming to represent an obscene arrogance, not something to be proud of.

I don't see tourist viewing of wolves as the most important issue here. It certainly would be an added tourist attraction. More important is extracting humans from the equation of a balance of wildlife populations. Humans bring extraordinary capabilities into this balance and have proven time and again that human participation in this balance leads to the imbalance in other wildlife populations and often to the extinction of the target species.

Seriously! Is the killing of a few wolves each year for no real significant commercial purpose worth risking the extermination of an entire pack of this species? This activity is no more acceptable than the slaughter of elephants in Africa or Tigers in India to satisfy the needs of a few people for trinkets or useless tonics that serve nothing more than humans desires to demonstrate our prowess in the ability to kill other animals.

Alaska as a state should practice some introspection and ask as a population "why - really why - do we need to sanction this behavior".

Stanley R. Gage
Please support Proposal 142. It seems as though it is very important to tourism in Denali, which is of course very important to the state’s economy.
The loss of the Denali wolves due to the lack of a buffer zone is a loss to the entire nation and a disgrace to Alaskans. Every citizen pays taxes to preserve the national park and its contents and letting a few individuals kill and maim them is stealing from every US citizen who wants to preserve the packs & ecosystem. You are letting those trappers/hunters negatively impact Alaskan income because visitors now spend 8 hours riding a rickety schoolbus without ever seeing a wolf--who is going to return for that?

I maintain my Alasa residence and residency despite being temporarily stationed out of state.
As a long time land owner in Wolf Township I am strongly in support of closing the areas to wolf hunting. My undeveloped wilderness property is near the Savage River just north of the old Denali Park boundary. I believe it is used as habitat for the wolves that mainly range within the national park. These play an important ecological role within the park and are the basis of valuable long term research carried out by my Denali scientist friends Ade Murie and Gordy Haber (both deceased) and their successors. I fear that hunters and trappers have even hunted and trapped while trespassing on my property. I want to do as much as possible to prevent that and to protect the Denali wolves which remain a most valuable resource of the national park and an economic tourism attraction to the State of Alaska.

Thank you for consideration, Michael Gawel
Submitted By
Maya Gillett
Submitted On
2/1/2017 4:10:06 AM
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It is of utmost importance that the Board fully and forcefully support Proposal 142. This proposal would be a step in the right direction towards protecting wildlife, especially wolves, who are vulnerable and whose populations are dwindling. The wolves in this area are an incredibly important part of the ecosystem, but they are also a magical aspect of the landscape of Denali. I remember visiting Denali when I was 17 and seeing a wolf in the park - it was one of the most beautiful and moving things I have ever seen. Not only is protecting the wolves the responsibility and duty of the board, but it will also ensure that future generations have a reason to come to Alaska and to learn about their environment. Please do everything in your power to act responsibly to protect this species. Support Proposal 142.
To Whom it May Concern:

My husband and I have traveled to Denali twice and plan to again. I write to communicate our support for proposal 142. Wolves bring in more tourist dollars to the state than do hunting and trapping licenses. Furthermore, these activities have a negative impact on the wolves declining population in this important area. It's our feeling that the role of this department is to protect wildlife. We are asking you to do just that.

Thank you

Sincerely

Jane and Barry Golub
Hello, Board of Game. I am writing in support of Proposal 142 to preclude hunting and trapping of wolves on state land adjacent to Denali National Park. I visited Alaska for 3 weeks in 2015, in large part because of the state’s wildlife, and I was not disappointed!

I spent 3 great nights at the North Face Lodge in Denali National Park. I did not see a wolf, but a large part of Alaska’s allure to a traveler like me was knowing diverse animals, including wolves, were in the vicinity and that a sighting was possible.

Thank you for exercising your responsibility and authority to protect wolves, an important cog in the region’s web of life. Please adopt Proposal 142.
As a visitor to and a lover of Alaska I ask you to consider the vulnerability of wolves to hunting and trapping when they cross the park boundary onto state land. As you know the Denali wolves have been decimated when they cross out of the park.

The presence of the wolves is essential to tourism and science and help preserve the diversity of the animal populations. I would expect that the tourism revenue is greater than the hunting and trapping license fees.

thank you for your attention.

Susan Gregg

Remind the Alaska Board of Game that it is their responsibility and authority to conserve the wilderness and wildlife in this region.
Support Proposal 142

Please do not allow wolf kills or hunts. I have been a visitor in that area a number of times prior to 2010 and used to see wolves semi-regularly. Now, and recently, I hardly ever see a wolf. Please Stop the hunt or help reduce hunter wolf kills as much as you can.

Thank you, Dawn Groth
I have been coming to Denali Borough once a year for the last dozen years to spend winter, and sometimes summer, with my family there. I have gone into the park as far as Camp Denali on almost each visit. I have seen most of the wild species that live in and near the park, but one encounter stands out.

I was walking along the bluff above the Nenana, around milepost 229, when I saw something move backwards. Unknowingly, I was on a perpendicular path to that of a wolf. We spotted each other at about the same time. We both stood perfectly still and stared into each other's eyes. And then it continued on its path, and I watched as it stopped several times to look back at me as it made its way down the bluff. When I could no longer see it, I moved on, too. But, I shall never forget those eyes. I shall never forget that it found me not to be a threat. I shall never forget my lack of fear. I shall never forget that wolf.

I can live without taking such an animal, but that animal cannot live without my protection and the protection of the proposed regulation.
Dear Board Members,

During your upcoming Interior Region meetings you will take up Proposal 142, authored by Denali Citizens Council and the Alaska Wildlife Alliance. This proposal brings back to the Board the idea of precluding hunting and trapping of wolves on distinct areas of state land adjacent to Denali National Park and Preserve, in game management units 20A and 20C.

The Board previously approved no-take areas for wolves in these same locations in 2001 and 2002 when the Park wolf population was much higher than the record-low numbers that have persisted in recent years. While research has shown that hunting and trapping do have a real affect on the park’s wolf population, it is, of course, one of many factors that contribute to changes in population size. A buffer zone, however, will ease one of the known human-caused factors for wolves’ recent population decline in Denali National Park. We fully support the language of Proposal 142.

We know first-hand how powerful and meaningful for park visitors is the experience of viewing wolves in the wild. My family owns and operates Camp Denali and North Face Lodge, two wilderness lodges in the Kantishna, the heart of Denali National Park. About 2000 park visitors come through our doors each summer. We’ve been in business for 65 years. The ability to view wildlife in the wild—wolves, bears, caribou, moose, mountain sheep, and birds from all seven continents—is one of the primary reasons our guests choose to visit Denali National Park.

This is an opportunity that ought to be in the best interest of all Alaskans. The revenue generated by park visitors does not just go into the pockets of the cruise tour industry. The vast majority of our guests choose other small, Alaskan-owned lodges, bed and breakfasts, small boat companies, tour operators and restaurants to round out their Alaska vacations. Money spent is being kept in our communities.

Furthermore, as park visitors bring home with them memories made with the wilderness and wildlife of Alaska, they are more apt to seek out and protect the same at home. Direct experiences with wildlife in the wild help build advocates for wildlife and wilderness.

Establishing a buffer zone with stricter hunting and trapping regulation around Denali National Park also forwards to the public a much more positive, collaborative relationship between the National Park Service and the State of Alaska. There currently is such glaring disparity state versus federal management of fish and wildlife across Alaska. This disparity is embarrassing and awkward to convey to park visitors. While on the public side of the park boundary wolves are perceived as an integral part of a full-functioning ecosystem, on the state side they are viewed as competition in a system that requires human intervention. Full-functioning ecosystems are healthy ones for predator and prey alike.

I urge you to re-create a no-take zone of wolves in game units 20A and 20C, to respond to the recent population decline of Park wolves, to put forth to the public a more collaborative relationship between federal and state wildlife managers, and to honor the long-held desire by many park visitors to see wolves in the wild.

Sincerely,

Jenna and Simon Hamm

Owners, Camp Denali and North Face Lodge

Denali National Park, Alaska
To the Board of Fish and Game,

I'm writing to show support for a no-take buffer zone adjacent to Denali National Park to protect the park's wolves, if they wander across the boundary. The loss of a pack leader is devastating to the pack's cohesion and hard to recover from.

The pack is a big draw to tourism.

thank you for your consideration for protecting this one pack that we need to protect as a unit in Alaska.

Jane Handy
I am writing in support of Proposal 142 which would establish some closed areas next to and surrounded by Denali National Park for the protection of iconic wolf families that often den in or near the east end of Denali National Park. These wolves are of special interest to tourists and Alaskans alike and serve as educational representatives of their species. Hunting and trapping are contributing to their decreased numbers.

Thank you for this opportunity to comment.
Dear Alaska Board of Game,

Thank you for the opportunity to comment on Proposal 142, scheduled for discussion at the Region III meetings Feb. 17-25, 2017.

Please prohibit the take of wolves on lands in GMU 20 adjacent to Denali National Park. The Alaska Board of Game has acted in the past to create no wolf take zones to enhance their numbers for the viewing public. And that was at a time when the Denali population was double, what it is now. This idea makes economic sense and fulfills ADF&G management goals for wolves. It's time to do it again.

Here are the key points:

- These wolves face a specific risk from both hunting and trapping, when they take forays onto state lands at the northeast boundaries of the park.
- These wolves are of international importance for both tourism and scientific study.
- There is a biological and economic value in preserving a diverse animal population.
- The Board of Game has both the responsibility and authority to provide conservation on state lands in this region.

Unquestionably, Denali National Park’s iconic wolves are high on visitors’ lists of animals they hope to see. Those visitors spend money that has an enormous impact on the local Denali economy. A recent NPS report showed that the more than 530,000 visitors who came to the park in 2014 spent $5.24 million dollars in nearby communities.

Therefore, I request that the Board of Game establish “no-wolf-take zones” in GMU 20, adjacent to Denali National Park as stated in Proposal 142. This reallocation of use from hunting/trapping - to viewing wolves will enhance the economic benefit of this area to all Alaskans. The local and state tourism economies will benefit when visitors have an improved chance of seeing wolves. And it will benefit the almost thirty years of collaborative scientific study of wolf ecology in the Denali region.

Thank you.
I am submitting this comment in support of Proposal 142. Wolves in Denali National Park and Denali State Park are important to Alaska’s economy and provide an important role in the population dynamics of the parks. As an apex predator, wolves require a large home range and it has been documented that these wolves traverse the park boundaries. Wolves predictably den and spend their summers within the National Park and then travel onto State lands in the winter and spring. These are the same wolves that draw tourists from all over the world and bring in millions of tourism dollars. Because of the lack of protection on State lands, the wolf population has seen a steady decline. The Board of Game has statutory authority to conserve its resources and supporting the larger no-take zone as described in Proposal 142 will help conserve this important state resource.
Although I get my mail in Cantwell, I live in the McKinley Village area. Since I first moved here, in 2005, I have seen fewer and fewer wolves on the trails in our area. (I mush dogs.) I am concerned about the wolves who wander out of the Denali Natl Park boundaries, and are thus prone to being killed by sport hunters and trappers. (Let's face it: who eats wolf meat???) My fellow neighbors like to see wolves. Thousands of tourists who visit Denali in the summer like to see wolves. Many of the wolf packs are being decimated because important members of their packs wander over the borders and get killed. There are plenty of caribou around, enough for humans to eat and wolves to eat. Let's permanently reinstate the buffer zone on the Stampede end of the Park!
Submitted By
Dan Hestad
Submitted On
2/2/2017 8:02:52 AM
Affiliation

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It is clearly in the best interests of Alaska, visitors to Denali, and all Americans that these wolves should be protected. Science has continuously shown that ecosystems thrive when wolves are part of it. Further, wolves are not generally a threat to humans or human activity. Finally, there is a significant financial benefit to protecting wolves in and around the National Park. As a wildlife photographer, I know the attraction people have to wolves. Some wait a lifetime for the chance to see one. Many pay significant money to take pictures of them. They are a national treasure.
This comment is in reference to Proposal 142, establishing a buffer area for wolves adjacent to Denali National Park.

As a professional wildlife photographer who's worked in Denali National Park and the bounding areas many times over the last 25 years, and as someone who's contributed large sums to research within the park itself, I support the establishment of a buffer zone where wolves are not hunted. I believe that it's needed. I've watched critical habitats worldwide where edge boundary conditions have led to animal endangerment. In Denali, the proposed areas to be closed are particularly important: one is essentially an arbitrary reach into the protected areas and bounded on three sides by them, the other is the area where humans congregate and have a tendency to tempt wild animals through things like improper waste disposal and even something as simple as smell.

Let it be known that I'm not someone who believes in getting rid of hunting, only that we manage where and how we hunt in ways that are not producing highly negative results to animal populations in healthy ecosystems. I've contributed to animal research all around the world, and the one thing that comes up again and again is the dangers to animal populations when ill-considered human incursion (and hunting) take place at arbitrary boundaries the animals aren't likely to understand or respect. I've witnessed wolves in the areas where the hunting ban is proposed, and for good reason: one of the packs at the time was crossing that land as part of its overall territory. As you well know, the Denali wolves have fairly large territories; I think we're putting boundaries in that don't jive with their daily habits. Packs established outside the park boundaries and not protected from hunting are a different story, but they also don't tend to use the area in question. What's trying to be done with this proposal is make sure that the wolf packs native to Denali NP have a secure territory where they won't be hunted.

One of the reasons I return to Denali, often bringing a large group of workshop students, is because of the wolves. Not necessarily just the wolves per se, but the broad and interesting diversity of the animal populations contained within the park, and yes, the drama of animals living with and hunting other animals, as the wolves do. Denali is one of the few places in the US where we still have close to a fully functioning ecosystem. Damaging that in any way would start to remove the incentive for me and others to travel the long way to see it in action. If pack size gets reduced too much through hunting adjacent to the park, you may not have hunters coming to Alaska any more, too. The risk involved with not making this small protection is far too high.

Personally, I'm happy that you're even considering Proposal 142. There are places in the world that are not listening to constituencies and not living up to the responsibility of their job. Please consider the proposal carefully. I believe that closing those areas to hunting will help Alaska conserve the wildlife of the region and continue to make it attraction to ecotourism.
I support proposal 142. The proposed buffer (defined in the proposal) outside Denali National Park needs to restored as an area closed to hunting and trapping of wolves. Removal of the buffer area has led to a reduction in the number of wolves and stable wolf packs in the park and significantly reduced the opportunities for Alaskans and visitors to our state to view wolves. I have lived in Alaska almost 40 years and despite numerous visits to DNP in the last +10 years I have not seen or heard a single wolf. There was a time when I frequently would catch a distant howl or a brief glimpse. PLEASE APPROVE PROPOSAL 142.
The Wolf Conservation Center Supports Proposal 142

The Wolf Conservation Center is a nonprofit organization that promotes wolf education and conservation, and it is currently supported by more than 3 million people across North America and beyond. In addition to many other educational experiences, we promote educational tourism opportunities throughout the USA and Canada, which enable participants to observe and learn about wolves in their natural habitat. Encouraged by growing interest, we explored trips to Denali National Park for the sole purpose of planning educational wolf watching adventures. Despite difficult economic times, we remain eager to support Alaska’s tourism industry.

It is our understanding that from 2000 until 2010, the State of Alaska prohibited wolf hunting and trapping in two areas bordering the park, the Stampede and Nenana Canyon Closed Areas, in order to protect two of the park’s three most-commonly viewed wolf packs. At the spring 2010 meeting of the Alaska Board of Game, the National Park Service submitted a proposal to extend the eastern boundary of the Stampede Closed Area. Instead, the Board of Game decided to eliminate both closed areas and allow hunting and trapping wolves in all areas bordering the park.

In 2010, Denali National Park and the University of Alaska Fairbanks, with the cooperation of the Alaska Department of Fish and Game, began a study of wolf movements, wolf survival, and wolf viewing opportunities along the Denali Park Road. During the course of the study in 2012, the death of a breeding female from a pack that lived along the Denali Park Road was followed by a drop in wolf sightings. This was one of several instances where the death of an individual wolf, from legal trapping or hunting, sparked widespread media attention and concern in recent years.

Unfortunately, the national reputation of the State of Alaska in terms of its commitment to wildlife tourism was damaged when the Alaska Board of Game rejected a petition urging the Board to enact a wolf buffer (no-trapping/no-hunting) zone on a small parcel of state land along the eastern boundary of Denali National Park in 2012. Sadly, wolf densities for the past three years have been the lowest in Denali since 1987. The number of wolves in Denali has declined from 147 in fall 2007 to only 49 now, and the number of wolf family groups (“packs”) declined from 20 in 2008 to only nine now. Visitor wolf-viewing success has declined from 45 percent in 2010, when the buffer was eliminated by the state, to only 5 percent last year.

More than 530,000 visitors come to Denali each year, about 50,000 of whom are Alaskans. Many cite the opportunity to see wolves as one of their primary objectives for visiting the park. A journey to Alaska requires a substantial financial investment on the part of those visitors. It would be unethical for us to ask our supporters to spend their hard-earned dollars on such an experience when, in all probability, they may not see the very wildlife they expected to see during a “wolf-viewing” adventure.

Beyond eco-tourism, it is important to note that a healthy wolf population is more than x-number of wolves inhabiting y-square miles of territory. The notion that we can “harvest” a fixed percentage of an existing wolf population that corresponds to natural mortality rates and still maintain a viable population misses the point. It’s not how many wolves you kill, its about which wolves you kill. Natural losses typically take younger wolves, whereas hunting and trapping take the older, experienced, wolves that are essential to the pack’s sustainability. They know the territory, prey movements, hunting techniques, denning sites, pup rearing and teaching. When a breeding wolf is killed by humans, it sets off a chain of events that leaves the rest of the pack at serious risk of survival.

Denali is one of Alaska’s top tourism attractions, and is responsible for more than $500 million in economic activity each year in Alaska. Wolf viewing rates are an economic indicator in a tourism economy where many of our supporters say the prospects of seeing a wolf is the reason they want to visit Alaska. The state should realize the obvious ecological and economic benefits of restoring and sustaining the wildlife of Denali but has yet to hear the voices of countless wildlife educators and conservationists.

In addition, such practices as wolf bounties and wolf trapping send a clear signal to potential visitors that the locals do not respect the wolf’s place as valuable native wildlife. If, however, the proposed buffer zone were enacted, we believe we could reasonably assure our supporters that all was being done to encourage a positive and rewarding eco-education and tourism experience.

It is clear that the Alaska Board of Game needs to reassess their intent and ask what part of the public their decisions serve. What narrow special interests are pushing for no buffers? Do the majority of Alaskans really go out to hunt and trap wolves? When all the facts are weighed, we believe the perceived need to kill wolves will appropriately dissipate.

Thus, we support the Alaskan people in their recent petition to Alaska’s Governor Walker which asks for three significant adjustments to
the current predator control/Intensive Management (IM) practices which would dramatically reduce the unnecessary killing of Alaska wolves and bears. Not only will our organization be able to fulfill its educational mission, but the resulting positive ecological and economic impacts will benefit Alaska’s wild ecosystems, its citizens and its tourism industry.

*Wolf Conservation Center Executive Director, Maggie Howell*
Submitted By
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Submitted On
2/3/2017 10:03:49 AM
Affiliation

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I support the proposal for the establishment of a wolf sanctuary buffer zone adjacent to the Denali National Park.
142 should be set in place and enforced
Submitted By
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Submitted On
2/1/2017 11:32:43 AM
Affiliation

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Please support the protection of wolves from hunting on State lands adjacent to Denali National Park and Preserve with Proposal 142. Park wolf populations are vulnerable to hunting and trapping when they cross Park boundaries onto State land. Visitors come from around the world to see the diverse wildlife in Denali National Park, and wolves are an important and special part of that diversity. It doesn't make sense to protect them in the Park only to have them hunted if they cross into State land.
I support proposal 142 mainly on moral grounds. I think it is wrong to establish a wolf population only to kill it off - what is the point? My husband and I have been hunters in the past, but we killed only for food. The hunters that target wolves are killing for sport. Trapping wolves for fur may have been necessary in the past, but those days are long gone. I can sympathize with ranchers who have to protect their herds - the presence of wolves adds another layer of difficulty, and the ranchers did not choose to have wolves reintroduced. The need to dispatch a wolf that can not be discouraged from targeting livestock may be necessary from time to time, but to kill a wolf for "fun", or as in the case of trapping, for money, is just wrong. Although it is unrealistic to think we can stop sport hunting, we can at least give the Denali wolves a little more of a chance for survival with this proposal. I am a wildlife biologist, and have been to Denali, though it was many years ago, and I saw no wolves. I've hunted elk in the area surrounding the park, as well. It is a stunning area, and wolves complete the picture there. I hope to someday see a Denali wolf, and this proposal would certainly help make that possible. But it's not about me. It's about a population of wolves that has been allowed to thrive only to be culled. Adults foraging for food are killed as they enter hunting zones, negatively affecting their pup's chances of surviving. It is only fair to give these spectacular animals a chance for a healthy, happy life -- we share the earth with them, and they deserve as special a life as we seek for ourselves.
I fully support Proposal 142 -- prohibiting the take of wolves on lands in GMU 20 adjacent to Denali National Park.

I am Becky Irish and I have lived in McKinley Village for 19 years; I own my home in what I believe is the most beautiful place on the planet. I am a military veteran having retired from Clear AFS after serving 20 years in the Air Force. I am also a wilderness tour guide in Denali National Park and Preserve and have driven the Denali Park Road for the past 16 years. I interact with thousands of tourists throughout the summer who ride my tour bus into the park. Their primary reason for visiting DENALI is to see wildlife in their natural environment. Visitors feel disappointed on days with low wildlife sightings; they feel cheated when I tell them wolf numbers are at such low levels that they probably will never see one. Visitors walk away with a feeling of a wasted trip to Alaska, they may feel as though the tourist brochures portraying bears and wolves gave them false hope of experiencing a wild place. For many of my visitors - the Denali Park Road is the “wildest” place they may ever experience in their lives. If you were to talk to the old timers around here who have driven buses into the park for 30 or 40 years, they will tell you wildlife sightings now a days are fewer and farer between. The Denali Park Road really is one of the last places left on the planet where a visitor can ride on a bus for a day and have the opportunity to view sub-arctic wildlife.

Please prohibit the take of wolves on lands in GMU 20 adjacent to Denali National Park.
Dear Board Members,

I am writing in support of Proposal 142, which would prohibit the take of wolves on lands adjacent to Denali National Park. I travel to the park every year, and bring photography groups from all over the country to the North Face Lodge. Each group expresses the most interest in seeing wolves, but we rarely see them. In the last 6 times I have visited the park, I have seen only 2 wolves. By comparison, each year we routinely see brown bear, caribou, moose, and more.

The number of wolves in the park is already very low, and is down by half from what it had been in the 2002 count. If the numbers continue to diminish, soon the packs will be unable to reproduce in adequate numbers to sustain themselves. If things remain unchanged, given that the wolf population is half of what it was 15 years ago, the chances are good that there will no wolves left in the area at all in another 15 years. That would be a very sad day for Denali National Park, for its visitors, for Alaska, and of course for the wolves.

A big reason photographers travel with me to Denali National Park is to experience our country’s Last Frontier. They also are eager to see a variety of species in the wild. And for so many people the wolf represents, more than almost any other animal, what wilderness and wildness are all about.

My understanding is that the wolves routinely cross boundaries from the protection of the National Park onto unprotected state land, and back again, as their needs require. The moment they leave the protection of the Park boundary, they are vulnerable to hunting and trapping. This would be minimized with the adoption of this proposal.

While money should not be the primary reason for any conservation efforts, the fact is that finances do have to be considered. It seems clear that revenues from tourism in the state of Alaska and Denali National Park are far in excess of any revenue that comes from issuing hunting and trapping licenses. The regional and state economies would benefit from the preservation of the Denali wolf population.

Wolves have always had great appeal. We revere their strength, their cunning, their group cooperation, their family values, and their beauty. Now is the time to protect their numbers, and preserve their presence in Denali National Park for the long-term future. It is the duty and responsibility of the Alaska Board of Game to assure the conservation and protection of the wildlife and the wilderness of this region. You have the mandated authority to take this action, and I hope that you will see fit to enact Proposal 142.
I am a California resident who has visited Alaska a number of times and strongly urge the Board to support Proposal 142 to protect Denali Park’s wild wolf population. Thank you for your consideration.
I am writing in support of increasing protection for wolves as contemplated in Proposal 142. I've had the privilege of hearing a pack of wolves one night while doing volunteer trail work near the Snake River and I will never forget it. I was a second time visitor to Denali National Park this summer along with thousands of other tourists. I came to see the wildlife primarily but unfortunately I neither saw nor heard any wolves. I know that they are very vulnerable to hunting and trapping when they cross the park boundary onto state land. It is critically important that we have intact, diverse animal populations in the Denali region. Of greater benefit to the State of Alaska are the revenues from tourism to Denali National Park than the hunting and trapping licenses sold for the taking of wolves on adjacent state lands. Please exercise your authority to fulfill your responsibility to conserve the wilderness and wildlife in this region for the generations that follow ours. "We do not inherit the earth from our ancestors, we borrow it from our children." Native American Proverb.
Submitted By
Frank Keim
Submitted On
1/31/2017 8:54:14 PM
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ADFG BOARD OF GAME

To Whom It May Concern:

Thanks for the opportunity to comment on saving the wolves of Denali National Park.

I'm a 56-year resident of Alaska and an owner of land on the Teklanika River immediately adjacent to the National Park. I would like to add my voice to those who wish to save the remaining 49 wolves in the Park by asking you to reinstate the protective Buffer Zone that you dismantled in 2010.

I have read Proposal 142 written and submitted by the Denali Citizens Council to the Board of Game for your consideration on Feb. 18, 2017, and I agree with both the letter and spirit of their proposal and the boundaries they recommend for the Buffer Zone.

Here are my reasons why I believe Denali wolves should be protected:

These wolves are important for the maintenance of the integrity of the ecosystem of the Park and the surrounding area. Since 2010, the wolves have suffered drastic declines in their numbers as a direct result of hunting and trapping on the N.E. borders of the Park.

The value of these wolves for continued scientific study is extremely important.

The importance of these wolves cannot be overestimated in terms of their monetary value to tourism. Viewing statistics by tourists (including myself) of these wolves are at an all-time low. This could have negative consequences for the local and state tourism economy.

It is the legal responsibility of the State of Alaska to protect these wolves as an integral part of the ecosystem of the area so that all Alaskan citizens may benefit equally from them whether for non-consumptive or consumptive uses.

Please respect these words and vote to restore the Buffer Zone.

Thanks.

Frank Keim
Please adopt some measure of added protection for the wolves in the Stampede Trail / Nenana Canyon. The financial gain of a few in the area who squander this unique resource for their personal betterment is irresponsible and short-sighted. Scientific studies conducted recently directly relate the wolf populations and pack integrity to the taking of alpha females, an act that has directly impacted park packs in recent rears and a practice that that needs to be avoided at all costs if the parks populations are to recover. The financial value of these wolves is far greater if they are seen in the park alive rather than on a hangar on a showroom floor or displayed privately in some wealthy trophy-hunter's wall. It is suspect that borders are where they are in the first place - it is an arrangement that was never fair to the wildlife in the area, and continuing this system is unconscionable. I hope you will give the wolves - and those who value them for more than the price of the hunt or their pelt - a chance to experience this vital part of Alaska as it was meant to be.

Catherine Kershner

Fairbanks
Submitted By
Patricia Kinnunen
Submitted On
2/2/2017 11:19:08 AM
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Please support Proposal 142 for the animals.

Patricia
Kiss A Moose  
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907-223-7269  

February 3, 2017

Via electronic mail to dfg.bog.comments@alaska.gov

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

Re: Support for Proposal 142

Dear Board of Game:

As you know, you have a long history of representing the goals and values of trappers and hunters while ignoring everyone else who is only concerned with wildlife viewing. This comment is being submitted in support of Proposal 142 to reinstate the buffer for the Wolf Townships along Denali National Park (DNP). Our company may be called Kiss A Moose, but we stand up for predators because they are vital to our ecosystem and healthy populations of ungulates. Predators also bring a lot of enjoyment to us because it is really interesting to observe pups play or watch the social interactions of adults.

The proposed buffer is needed to protect wolves. Since the buffer was removed in 2010, wolves have been in a steady decline. A few short years ago, a visitor would see wolves 45% of the time. Now, the likelihood of seeing a wolf is about 5% because several packs, including the famous East Fork pack, are now gone. You have allowed them all to be killed in a short-sighted and scientifically unfounded predator control scheme.

Our company is owned and operated by people who are part of the 85% of people who do not hunt and are not represented by the Board of Game. We have a vested interest in keeping wolves alive. We are professional photographers, and wolf pictures are one of our top sellers. We have no video of wolves because they are so hard to find. Our best-selling wolf picture is a picture of a captive wolf because we have not been able to capture an image of a wild one in recent years.

Wolves are a keystone species and they belong in and around DNP if it is to remain an intact ecosystem. The last wolf I saw was a two-second glimpse back in 2015 (and it was not in DNP). We can spend a week or two in DNP without seeing a wolf, and no one on our staff has seen a wolf in DNP in years. I recently read an article written by a woman who lives within hours of DNP, but flew to Yellowstone National Park specifically so she and her daughter could see wolves. It is a tragedy that I, too, will be financing a trip for someone from my company to travel outside of Alaska to take wolf pictures when we should have plenty of wolves right here.
The general public is under the impression that DNP is a magnificent park where animals are completely wild and their numbers are unmanipulated by man. People are horrified when they find out that the Denali wolves are slaughtered as soon as they leave the park. They are even more horrified when they find out about the State’s practice of collaring wolves to kill off entire packs or allowing people to kill pups in their dens or kill wolves when their pelts are worthless. These inhumane and unethical hunting practices–aerial gunning, denning, killing over bait–are an embarrassment. The least you can do is protect the few wolves who live along DNP and reinstate the buffer rule.

Please do the right thing for Alaska by protecting these wolves. The Board knows that 85% of residents don’t hunt. The Board knows that DNP is visited by hundreds of thousands of people each year. The Board knows that these visitors bring millions of dollars into the State each year. The Board knows that the wolf population has been decimated since the buffer zone was eliminated in 2010. Therefore, the Board must know that the buffer zone is a necessity for our economy, natural diversity, and for public enjoyment of DNP. The rest of Alaskans (and the millions who come here from all around the world) want to see the wolves alive. Stop catering to the handful of Trapper Creek trappers and hunters and listen to everyone else who wants to see these animals flourish in their natural habitat.

Kiss A Moose supports Proposal 142 and supports wolves having an opportunity to live in their natural habitat without interference and inhumane hunting and trapping methods.

Thank you,

Jeanette Frost
Director of Business Development
I am supporting proposal 142 and am urging the Board of Game to pass this proposal. This is central to the future of wolves that are a central attraction to visitors to Denali National Park. The visitor industry is a major component of the Alaskan economy. Wildlife viewing is paramount and must be considered as such in deliberations and decisions of the Board of Game. The attraction of Alaskan wildlife experiences including viewing has become a major use of Alaskan wildlife. The decimation of Denali wolves due to trapping and hunting has a negative impact upon visitor viewing of Denali wolves and has been documented in peer reviewed, published reserach. This situation cannot be ignored in management decisons by the board. I make this earnest and personal plea to not choose half measures and to pass 142 as a major component of an overall economic reality of our state. Such support for wildlife viewing experiences is central to the good stewardship necessary to continued building of a major sustainable feature of our Alaskan economy and cannot in good conscience and good management be cast aside and ignored. Please do your share with passage of this proposal. Thank you.

James Kowalsky Fairbanks
I am writing to lend my support to Proposal 142 regarding the establishment of wolf no-take zones adjacent to Denali National Park. While I live in California I have traveled to Alaska, drawn specifically by the chance to see wildlife in the natural habitat. I am happy to say that I have seen wolves within the park boundary and I am sure that these no-take zones will increase the chance for others to see these magnificent animals—with no adverse effects.
I strongly support Proposal 142 which would finally establish a safe haven for wolves and bears along the Denali National Park and Preserve northeast boundary. The selfish behavior of trappers and hunters in regards to killing wolves and bears in the Wolf Townships is impacting visitors to the park who shoot with cameras and NOT with guns. It is time to stop the carnage and the BOG is asked to listen to the significant Alaskan and visitor population's desire to establish a safe haven from the 2 legged predators.

I am personally tired of supporting those who want special support for their chosen lifestyle. If someone wants to play Little House in the Far North, go for it. BUT don't expect there to be special rules to enable you to deny the thousands who want to see wolves and bears outside of a zoo. Non-consumptive behavior has a strong following.

BOG, I am asking you to consider representing the many, not just the few hunters and trappers which includes yourselves. I am an Alaskan of 28 years and my voice has the same value as any one of yours. Stop the egregious carnage,

How can you justify killing all the wolves in the Kenai area?

Nancy Kuhn
2060 Amy Dyn Rd
Fairbanks, AK

"Representing the many and not the select few"
Stop killing the wolf, enough with trophy hunting.

- The predictable vulnerability of wolves that den and spend summers inside Denali Park when conducting forays onto state lands in winter and spring.
- The importance of wolf conservation in this region of the state of Alaska, where tourists from around the world come to see diverse animal groups.
- The economic importance of the conservation of wildlife in this region to the state of Alaska, bringing millions of dollars into the local economy yearly.
- The clear statutory authority of the Board of Game in providing for conservation of resources, and the appropriateness of making that type of decision for these particular lands.
To whom it may concern on the BOG,

For 33 seasons I drove Wildlife Tours at Denali National Park. I raised my family near the park in the summer and in Anchorage in the winter. Over the thousands of trips that I took into Denali National Park I had the opportunity to share wolf sightings with thousands of visitors. Given the connection between humans and canines, viewing a wolf in the wild is often a profound experience for park visitors.

The wolf packs of Denali are probably the most viewed wild wolves in the world. Over the years, many park wolves have been taken by either hunters and trappers, often very close to the Park boundary. Given the vast scale of Alaska, so much of which is open to wolf hunting and trapping, protecting critical wolf habitat adjacent to Denali National Park is a small sacrifice for state residents, but provides potentially huge benefits for park visitors.

Alaska is a state of tremendous vastness, most of which visitors never have a chance to see. If a trip along the Denali Park Road provides a visitor with an opportunity to view a wild wolf, we have afforded them a personal, genuine, wilderness experience they will remember for a lifetime.

I ask the BOG to please approve Proposal 142.

Most Sincerely,

David Laughton

907.947.7657
I am writing to support increased protection of wolves through the measures identified in Proposal 142.

I recently visited Denali National Park for the first time and it was the trip of a lifetime. I am 63 years old and a teacher and an outdoor enthusiast. I teach ecology to middle school and high school students. Denali seems like it still contains the bio diversity that is rapidly disappearing in other parts of the country. The eco-system is still very much intact and wonderful to behold. While there, however, I did not see any wolves which was a disappointment. I was told that they are threatened by hunting in nearby areas. It seems important that the remaining wolves be protected. We need to do all we can to preserve and protect the species we have left. It is important that we maintain diverse animal populations. This is good for the natural ecology, but also a benefit to the State of Alaska because of the tourist revenues from tourism to Denali National Park. This importance will grow with time. Hunting the wolves is a deadend game, and very short sighted.

Please take action to protect the wolves by supporting Proposal 142.
The wolves of Denali Park and Preserve that foray onto state lands toward the northeast section of the Park need protection. If you believe in the value of science, and also believe in the value of tourism for this region and to the state of Alaska, then I would hope that you will prioritize these goals for the wolf population in the Denali area. Future generations of humans from all over the planet will thank you.
We strongly support proposal 142. Alaska wolves of Denali National Park need protection and buffer zones from hunters. The wolf population in DNP is dwindling and we feel the Alaska Board of Game must do their part to preserve our wildlife. Respectively, Judy Lehman and Kenn Moon
Support Proposal 142 to allow a buffer on State owned lands so Donali wolves can safely transverse without being subject to those who use this opportunity to hunt wolves. Wolves need to travel this corridor without the vulnerability of risking their lives - hunting for sport should be banned within a regulated buffer to insure their survivability.
I would like to voice my support for Proposal 142 to protect wolves along the northeast corner of Denali National Park. Wolves regularly cross boarders unknown to them as the go on hunting forays outside the park. In fact animal populations are important to the overall health of the region, and including wolves as part of the ecosystem helps to keep other populations Alaskans rely on, like moose and caribou, healthy.

The East Fork wolf pack was the longest study of wolves to date, and as of last summer it was feared that, after finding the male dead, the pack was also dead with him, because the female and pups that remained would be unable to survive. It is a tragedy to lose that study especially as so much of interior Alaska is and will be going through major changes as the climate warms. What affect does the melting permafrost, increased temperatures and fires, and brushification of the arctic and sub arctic have on wolf populations? We may have a hard time gaining that knowledge with the passing of the East Fork pack.

I have the great privilege to work in Denali National Park each summer and share this, one of our planet's last wild gems, with guests from around the world. They come for respite from the "outside", to unplug and refresh, and to experience the wilderness. One of the long lasting symbols of that wilderness is the wolf. It seems to be every visitor's dream to glimpse one, and yet, I can say with absolute honesty that I have never seen one and the chances of observing a wolf in the wild are getting slimmer and slimmer. The wilderness, more and more, is driving the Alaskan economy as people flock here each summer. I ask you preserve this small piece of it, and protect wolves, as a symbol of Alaskan pride and the wilderness so many seek.

Thank you and please, VOTE YES ON PROPOSAL 142.
Submitted By
Doug Lenier
Submitted On
2/2/2017 1:52:13 PM
Affiliation

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SUPPORT PROPSAL 142

As a member and supporter of the Alaska Wildlife Alliance, and Denali Citizens Council, I write in support of Proposal 142 to establish a NO HUNTING/TRAPPING buffer adjacent to Denali national Park.

There is much precedent for a no hunting/trapping area in the Stampede Corridor/Nenana Canyon. In 2001-02 the Board acknowledged that the park wolves were a valuable resource for visitors, and set aside areas closed to hunting. The park’s wolf population (Spring 2002) was 97 wolves, far more than inhabit the park now.

The wolves that frequent the Corridor/Nenana/Park Road area are an important scientific resource. They are the subjects of some of the most-famous, longest-running scientific studies of wolf packs in the country. Hunting activities which ultimately result in the loss of entire packs abruptly and prematurely end decades of research.

Visitors to Denali (including my family) want to see wolves, and they spend a lot of money for the opportunity. No wolves or news that the state routinely allows wolves to be killed adjacent to the park for lack of a very limited buffer area - are black eyes for Alaska tourism, of which I, and my family are long time participants in. The millions of dollars tourism brings to the Denali area (including my dollars,) and the entire state are now, more than ever, crucial to the regional economy.

A mere 4 percent chance that a visitor will spot a wolf along the Park Road (as documented by the National Park Service in 2015) is an abysmally low number. Before the buffer was scrapped in 2010, nearly 50 percent saw a wolf.

I want the opportunity for my children and grandchildren to experience the incomparable Alaska wilderness, and for it to be preserved forever. Right now, the BOG can take this important step to help insure this outcome.

Thank you for considering my comments.
I have lived in Alaska over 40 years. Tourism is one of the largest moneymakers in Alaska. People come to Alaska to see wildlife, especially wolves and grizzly bears. Denali wolves are important to tourism. Please accept and pass Proposal142 prohibiting the taking of wolves on lands in GMU 2 adjacent to Denali National Park. Wolves are part of a health ecosystem.
I am writing in support of Proposal 142 to protect Denali wolves. I understand that this proposal will help prevent hunting and trapping of wolves in certain areas adjacent to the Denali National Park. I understand that the wolf population in the Park has been declining and I believe that efforts need to be made in order to maintain a healthy population. Wolves are a critical part of a healthy ecosystem and need your protection.
Submitted By
Charlie Loeb
Submitted On
2/3/2017 2:42:06 PM
Affiliation

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To the Members of the Alaska Board of Game,

I am writing to support Proposal 142 that will prohibit the take of wolves in areas adjacent to Denali National Park.

I am a long-time Alaska resident recently relocated out of state, but I retain my property off the Stampede Road west of Healy within the area contemplated for the restriction. My teenage daughter grew up traveling through Denali, and she thought wolves were the most common animal in the park because we saw them so regularly. We saw plenty of moose, caribou, and bear too, but those animals we commonly saw elsewhere in Alaska as well. The wolves were special to Denali.

No longer. It has been years since we have seen a wolf from the Denali park road. I recognize that there are many natural factors at work when it comes to wolf populations and the visibility of the animals in the park, but the targeted trapping along the park boundary undoubtedly has contributed the scarcity of visible wolves in Denali. The result has been a small reward to a handful of individuals at the expense of literally hundreds of thousands of others. That represents utter craziness, particularly since opportunities to hunt and trap wolves are abundant everywhere in Alaska, while Denali is – or was – the one place people wanting to view wolves could go with a reasonable chance of seeing them. That includes people like my daughter who were born in Alaska and do not hunt or trap, but nonetheless greatly appreciate Alaska’s wildlife.

What are you doing for her? Do you not represent her interests too?

Respectfully,

Charlie Loeb
• There is a precedent for a no hunting/trapping area in the Stampede Corridor/Nenana Canyon. In 2001-02 the Board acknowledged that the park wolves were a valuable resource for visitors, and set aside areas closed to hunting. The park's wolf population (Spring 2002) was 97 wolves, far more than inhabit the park now.

• The Board has both the authority and the responsibility to manage wildlife for conservation purposes. A majority of Alaskans support creation of a buffer to protect wolves in this small but critically important area.

• The wolves that frequent the Corridor/Nenana/Park Road area are an important scientific resource. They are the subjects of some of the most-famous, longest-running scientific studies of wolf packs in the country. Hunting activities which ultimately result in the loss of entire packs abruptly and prematurely end decades of research.

• Visitors to Denali want to see wolves, and they spend a lot of money for the opportunity. No wolves - or news that the state routinely allows wolves to be killed adjacent to the park for lack of a very limited buffer area - are black eyes for Alaska tourism. The millions of dollars tourism brings to the Denali area and the entire state are now, more than ever, crucial to our economy. Wolves need to be part of our Eco-System, this is very important and must happen.
I support Proposal 142 by the DCC and AWA prohibiting the taking of wolves in GMU 20. We need to preserve the ecosystem and give the wolves time and space to increase their population to a healthy number.
i'm writing to express my support for the proposal concerning closing the two areas adjacent to denali national park to wolf hunting. i've been visiting denali national park since 2008 and have spent the equivalent of over 6 months of my life in the park. it is the only part of alaska i visit regularly. i go mainly to photograph wolves. from 2008 until 2012 i had moderate success in viewing and photographing wolves. on the days i did not see wolves, i at least saw many sets of tracks that at least gave me the assurance that they were still around. from 2013 to the present (when i have spent the bulk of those 6 months in the park), i have seen two wolves. tracks were also becoming more and more rare. i did not see a single set of tracks the last time i was in the park for four days in september 2016.

i promise you that the number of people who visit denali national park with the hope to see wolves is much, much higher than the few who benefit from the hunting and trapping of them. you already know that. it's time to manage alaska's lands and wildlife sensibly, and with greater benefit to the wildlife, not to the few who just want to kill them. history will judge the current alaska dept. of fish and game policies as short-sighted, foolish, unhealthy for the natural environment, and beneficial for only a small percentage of the population.
I am offering my comments regarding my support for Proposal 142, regulating hunting and trapping of wolves in designated areas adjacent to Denali National Park. I have visited Alaska repeatedly over the last 40 years both as a fisherman and as a tourist with my family. We visited Denali Park a few years ago and we were privileged to observe wolves within the park during our visit. The opportunity to see wolves in the wild is a very important part of the attraction of Denali National Park to visitors. The wolves of Denali have declined in numbers and continuing to allow hunting and trapping of wolves in areas immediately adjacent to the Park will only further contribute to their continued decline. The wolves are particularly vulnerable as they emerge from their protection within the Park, and I fully support Proposal 142 which would provide some protection for the wolves in the designated areas immediately adjacent to the Park. Thank you for receiving and reading these comments.
Dear Board Members,

I am writing you about the vulnerability of wolves to hunting and trapping when they cross the park boundary onto state land. I feel there is an international importance of Denali’s wolves to tourism and science. The importance of intact, diverse animal populations to the regional and state economy is great. Of greater benefit to the State of Alaska are the revenues from tourism to Denali National Park than the hunting and trapping licenses sold for the take of wolves on adjacent state lands. It is your responsibility and authority to conserve the wilderness and wildlife in this region.

I have been to visit Alaska on more than one occasion and was lucky enough to see with my own eyes this beautiful animal in the wild. It is an experience that I will never forget. Please give the wolves the proper protection they deserve.
Dear Alaska Board of Game,

My name is Ryan Marsh and I am writing to express my concern over wildlife on the northeast boundary of Denali National Park and Preserve. I am a conservation biologist and work as a Naturalist Guide for Camp Denali and North Face Lodge. Denali National Park and Preserve was created to protect wildlife, and wildlife is the primary draw for the vast majority of the 650,000 visitors to the park just last year. Studies have shown that wildlife viewing is worth millions to Alaska’s economy and creates thousands of jobs. Despite Alaska’s remoteness, Denali NPP is regarded as one of the best places to view wolves and as a place to study intact ecosystems. Unfortunately, less than 5% of visitors to Denali last year were able to see wolves as opposed to over 40% in 2010 when a buffer zone was in place. Packs have been decimated by a few unfortunate (but legal) trappings in the northeast region, risking trophic effects such as mesopredator release as well as risking the reputation of Denali of as a premier wildlife viewing area. Maybe visitors from the Lower 48 should go to Yellowstone instead?

It is the responsibility of this Board to manage wildlife in the state. A buffer zone in this region makes ecological and economic sense. I urge the Board to vote in favor of proposal 142 to recreate a small buffer zone adjacent to Denali National Park and Preserve.

Sincerely,

Ryan Marsh
Dear Alaska Board of Game,

I ask you to support Proposal 142 to reestablish the wolf buffer on the NE corner of Denali National Park & Preserve. I am a 36-year resident of the Interior and have fished and hunted all during this time. But conservation, a fully-intact ecosystem and management for all State residents should be more thoroughly considered in your deliberations. I reiterate my testimony from last spring before you in Fairbanks: "Bring back the wolf buffer zone."
Please support Prop. 142, that would once again establish a no hunting/trapping buffer adjacent to Denali National Park, and allow the Park to once again host more wolves. This park sees thousands of visitors from around the world -- the two animals they want most to see are wolves and bears. I was at the Park last year -- and greatly disappointed that my guests did not see a wolf. In years past we did see them, but no longer. Please help get them back into the Park. Please support Prop. 142.

Thank you.
Submitted By
Laura Maschal
Submitted On
2/1/2017 7:09:27 AM
Affiliation
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6094941133
Email
lmaschal@gmail.com
Address
4603 Long Beach Blvd
Brant Beach, New Jersey 08008

Hello, I write to strongly urge you to support proposal 142. Wolves are critical to the health of our wild places, creating a trophic cascade! Tourists want to see wolves. Ten years ago, we saw so many - a privelege I will never ever forget. This past year, none. It is discouraging that the hunters know the easiest "pickings" are right outside the borders of Denali. We have so few wild places left and there is a new war on wildlife happening within the current administration. 2016 Saw the decimation of the Druid wolf pack. This is not ok!! Please do your part to protect for generations to come, the legacy of wolves in Alaska. This is one small step, but could mean life and death for this species. If you don't work to protect these animals, the who?

Thank you for doing the right thing on proposal 142!
Dear Members of the BOG:

I write to support Proposals 141 and 142, similar proposals that close a portion of GMU 20C to the taking of wolves. The proposals were submitted by Denali National Park and Preserve and the Denali Citizens Council/Alaska Wildlife Alliance. My support is based on the conviction that state and federal wildlife managers have a legal and professional obligation to manage for key wildlife viewing opportunities as well as the sustainable harvest of game animals. Viewing wolves in Denali is one of the most valued wildlife viewing opportunities in the State of Alaska and it has been measurably diminished by hunting and trapping on the border of Denali. Hunting and trapping here was not legal since 2001, but has been for the past few years because of regulation changes approved by the BOG in 2010.

I was particularly impressed with the Denali National Park and Preserve proposal. It was comprehensive, science-based, and fairly considered the effects on relevant stakeholders. The proposal should be considered a model for others. It limited closure to only those parts of the Stampede corridor that serve the purpose of protecting from hunting and trapping, wolves that are of interest to wildlife viewers who visit Denali.

Some argue that wolf populations in the Denali region are healthy and there is no need to restrict their hunting or trapping, even in certain viewing areas. However, micromanaging the consumptive as well as nonconsumptive use of portions of a wildlife population in key areas accessible to the public is often necessary to provide good viewing opportunities. Accordingly, micromanaging should not be considered an unorthodox practice. In fact, it is the basis why Alaska’s anadromous fisheries have been sustainably managed for decades. Fisheries biologists recognize that some rivers/streams need more specific regulation than others, even though overall, Alaska’s salmon populations remains healthy. Wildlife managers need to follow their example.

I served on the BOG in May, 2001 when the BOG first approved closing part of the Stampede corridor to the hunting and trapping of wolves. The BOG at the time recognized that micromanagement was needed and considered special regulations (mostly a buffer zone) for wolves that inhabit this area. They carefully considered where these wolves spend time within the park and where they might likely be found when wondering beyond park boundaries. The intent was too not overreach by imposing buffer zone regulations on hunting or trapping of wolves that were not likely to be seen by Denali visitors. And it worked. As the Denali Park proposal says, “the presence of the trapping and hunting buffer zone during 2000-2010 was associated with increased wolf sightings in Denali compared to 2011-2013 and 1997-2000... It should also be noted that the presence of the buffer did not decrease the average annual number of wolves harvested in UCUs overlapping the Stampede corridor.”

However, as you know, in 2010 the BOG at the time opposed the buffer zone and repealed its regulations. As the record shows, the viewing of wolves in Denali has since suffered. I not only think that the BOG’s decision then was biased and a mistake, but that it violated the spirit of Article VIII, Section 4 Sustained Yield of the State of Alaska Constitution, particularly the part that says, “subject to preferences among beneficial uses.” Furthermore, the decision goes against the spirit of Section 2 of Article VIII which says, “conservation of all natural resources ...for the maximum benefit of its people.” This is similar to a statement in 1905 by the great conservationist Gifford Pinchot who said, “Where conflicting interests must be reconciled, the question shall always be answered from the standpoint of the greatest good of the greatest number in the long run.” There can be no doubt that viewing wolves in Denali has substantial monetary and intrinsic value that has been sacrificed and that the greatest good is not now being served.

Fortunately, since wildlife can be a renewable resource and wolves have not been extirpated from the area, recovery of Denali’s wolf viewing opportunities is possible. But that would take change by the BOG, which Proposal 141 or 142 should accomplish. I strongly encourage you adopt either of these proposals.
Sincerely,

George Matz
Alaskans FOR Wildlife strongly supports Proposal 142, which would establish a no-kill buffer zone for wolves on State lands within the so-called Wolf Townships along the Stampede trail, and certain lands east of the Nenana River where some wolves associated with Denali National Park are known to use. Since a no-kill wolf buffer zone was abolished by the BOG in 2010, significant numbers of wolves that den in Denali Park have been killed, and the wolf population there is at the lowest level since data has been systematically collected. In particular, the renowned East Fork wolves have been essentially extirpated. This has had a profound effect on the opportunity for visitors to Denali of seeing wolves. The percent of visitors seeing wolves during their trip to the Park has declined from about 45% before the buffer was abolished to about 5% currently.

Wildlife viewing is a major interest for visitors to the Park, and seeing wolves and grizzlies are at the top of people’s list. Last year there were some 650,000 visits to Denali, however due to low wolf numbers near the road, an estimated 250,000 people were denied a chance to see any wolves, largely due to the impacts of hunting and trapping within the former buffer zone. This situation is becoming well known around the country and the consequences may have significant impact on Alaska’s economy during this period of fiscal problems.

It is time to help restore the decimated wolf populations of Denali and help safeguard our economy. We urge the Alaska Board of Game to pass proposal 142.
I worked in the tourist industry related to tourism of Denali Park. A prize for all tourists is to include a wolf sighting to their visit.

Opportunities for wolf sightings has gone down from over 40% to less than 10% coinciding with changes in state enforcement of the buffer zone.

There is no greater tourism ad than a tourist going south excited about their visit

We need the jobs and the boost to the economy much more than we need 15 more wolf pelts
As a resident of Talkeetna, Alaska and having lived and worked in Denali National Park for the last 17 years, I have some concerns about the management of wolves in the Denali Park area. There are many places in Alaska where hunting and trapping wolves is allowed, why can’t there be a place where it is not. Especially, when the place in question borders one of the most iconic Wilderness areas in the world? Rather than catering to the few hunters and trappers just outside the Park, I hope you will consider the interests of the many of us who live, work and play in and around Denali and the many thousands of visitors who visit our Park annually. Having been a shuttle bus driver for 14 years in the Park, I can tell you first-hand the joy and excitement seeing wolves in the wild brings to Alaska’s visitors. I have been with thousands of visitors when they saw their first wolf in the wild (in Denali). The experience was meaningful to every person who had it, bringing some to tears. If things keep going the way they are, it will have also been the only and last wolf they may ever see. I have personally witness the demise of the Toklat wolf-pack over the years. The decline coincides dramatically with the change in the wolf-buffer along the Park’s boundaries, as many of the collared wolves have been killed just outside the Park since the protective wolf-buffer was taken away. The Toklat wolf pack, a highly visible pack that brought so much happiness to the Park’s many visitor’s has been decimated in just a few years. It is my impression that the Department of Fish and Game has a duty to insure that there is balance in our ecosystems. Predators are essential to healthy ecosystems. Just sitting back passively allowing hunting and trapping to continue just outside the Park’s boundaries knowing that the Park’s wolf packs are being slaughtered does not seem like the right thing to do. As a resident of Alaska, as an employee of the Park, as an avid user of the Park’s wilderness, as someone who has spent literally thousands of hours with visitors to Denali, I implore you to reconsider the protective buffer around the Park so that the wolf population may rebound. If Denali National Park is going to continue to be a "crown jewel" of the National Park system, attracting millions of visitors to our state for generations to come, it needs to maintain its character and wildness. This cannot be done without your help. It is my sincere hope that those of you who have the power to reinstate the buffer to help protect Denali’s remaining wolves will do so. Please, please, reinstated the protective wolf-buffer around the Park’s boundaries to give these wolves a chance. The future of Denali’s wolves rests in your hands. It will be your legacy that either preserves the wolves for future generations, for the future millions of visitors to our great state and the countless residents who enjoy Denali’s pristine wilderness, which includes iconic wildlife. Thank You very much for your time and consideration on this very important decision, Sincerely, Cissy (Diane) McDonald
• There is a precedent for a no hunting/trapping area in the Stampede Corridor/Nenana Canyon. In 2001-02 the Board acknowledged that the park wolves were a valuable resource for visitors, and set aside areas closed to hunting. The park’s wolf population (Spring 2002) was 97 wolves, far more than inhabit the park now.

• The Board has both the authority and the responsibility to manage wildlife for conservation purposes. A majority of Alaskans support creation of a buffer to protect wolves in this small but critically important area.

• The wolves that frequent the Corridor/Nenana/Park Road area are an important scientific resource. They are the subjects of some of the most-famous, longest-running scientific studies of wolf packs in the country. Hunting activities which ultimately result in the loss of entire packs abruptly and prematurely end decades of research.

• Visitors to Denali want to see wolves, and they spend a lot of money for the opportunity. No wolves - or news that the state routinely allows wolves to be killed adjacent to the park for lack of a very limited buffer area - are black eyes for Alaska tourism. The millions of dollars tourism brings to the Denali area and the entire state are now, more than ever, crucial to our economy.

• A mere 4 percent chance that a visitor will spot a wolf along the Park Road (as documented by the National Park Service in 2015) is an abysmally low number. Before the buffer was scrapped in 2010, nearly 50 percent saw a wolf.

Alaska Wildlife Alliance
P.O. Box 202022
Anchorage, AK 99520
info@akwildlife.org
http://www.akwildlife.org
The Alaska Wildlife Alliance is a 501(C)(3) not-for-profit organization. Our tax identification number is 92-0073877. All donations are tax-deductible to the extent allowed by law.
Submitted By
Rosemary McGlynn
Submitted On
1/30/2017 2:22:35 PM
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AK visitor, former Camp Denali staff
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Members of the Board of Game,

My family & I first came to AK 27 years ago. Three nights in Denali was all it took to fall in love with its wild beauty. Since then we have returned as visitors and summer staff at Camp Denali. I cannot count the number of people over the years who have recounted their day's experiences in the park observing wildlife & their excitement when they had the chance to see wolves out doing what they do. Do you remember the first time you saw that lope that can go for miles? It would be a good thing if more people had the chance to know what that feels like. It is that unique way of connecting to wild country and wild things that draws so many visitors to Denali and keeps them returning. Of course, the number of visitors results in no small economic benefit in maintaining a healthy wolf population within the park and surrounding area. It seems clear that the wolves require certain protections if they are to remain a viable part of the Denali experience. So I ask that for the wolves and for the humans that you support Proposition 142. Please give it a chance.

Sincerely,
Rosemary McGlynn
I support proposal 142. I have lived in Fairbanks since 1976. I like proposal 142 because it establishes a no hunting/trapping buffer zone adjacent to Denali National Park.
Dear Board of Game,

This is my first day home by myself with a three-week old and a two-year old. Poop and tears are flowing, but this is important, so I'll keep it short. Please support proposal 142. The wolves that move between Denali National Park and the proposed buffer are worth far more alive than dead. Very few people benefit from hunting/trapping them compared to their value to science and society as part of a natural system in which they are icons of the wild. This is true symbolically, but also economically - "wildness" is at the root of what the half-million people who visit Denali each year come to experience, and seeing a wolf evokes a sense of wildness better than almost anything else.

Thank you for supporting this important proposal,

Sierra McLane

McKinley Village, AK, year-round resident since 2011
My wife, three friends and I spent 16 glorious days in Alaska in July 2015. While our wonderful vacation included Fairbanks, Anchorage, Whittier and the Kenai/Seward area, our trip was entirely motivated by a week-long stay at the remarkable North Face Lodge in Denali. As did everyone else we met, we loved Denali and the Lodge. On our ride out of the park, we even saw a wolf near us on the road; this was one of the highlights of our trip and, we understand, an increasingly rare sighting.

Denali is such a unique and fabulous experience anywhere in the world that the five of us are expecting to return, perhaps adding more friends, in the near future. While it seems petty to even mention the Denali experience together with dollars and cents, I do hope the tremendous, varied and stable economic development benefits it brings to all of Alaska from visitors like me are fully appreciated by all. And that everything possible can be done to preserve and enhance that experience.

Sincerely,

Charles McMillion
As a former Board of Game member, I urge the Board to adopt Proposal 142 to re-establish a no-wolf-take buffer along the easterly edge of Denali National Park. The economic benefits of this proposal for the Alaska tourism industry and for the hundreds of thousands of Denali visitors each year (who include thousands of Alaskans) far outweigh the value of 10 or 15 wolf pelts to the few trappers who trap this area. The "greatest good for the greatest number," and the renewable-resource nature of a live wolf seen by visitors over and over again throughout its lifetime, require that this Buffer be re-established. Thank you.
Dear Sir/Madam:

I have been to Alaska about a dozen times in the last 20 years, and each time I visit, I appreciate the natural beauty and richness of your wonderful state.

I have seen many landscapes and animals over the years, but my most treasured experiences are the times that I have seen wolves in Denali National Park. I fervently hope that you will consider any and all measures to expand protection of these amazing creatures in and near the Park.

The Park boundary of course means nothing to the animals, and it is crucial to protect them on state land as well.

I am sure that I am not alone in my feelings about the wolves. Many of us who visit from the lower 48 are influenced to do so by their presence, and the impact on the state and regional economies from such visits is a positive one.

It seems to me that it is in Alaska's best interests to preserve and maximize the wolf population -- which is one of its unique resources that distinguish it from many other wild places.

Please do the right thing and conserve the wildlife that you are so blessed to have.

Very truly yours,

Carol Melamed
I've read accounts of wolf management programs in Yellowstone National Park that conclude wolf populations will stabilize with little or no human interference. These stable wolf populations are reported to level off with abundant, stable, and healthy prey populations. Those populations create abundant balanced and sustainable plant forage. It makes sense that the area returns to the natural state from before modern technology destroyed the natural balance in the area.

I'm concerned that Alaska's wolf management policies around Denali National Park seem to work for opposite results. Alaska's wolf management program seem to be very expensive, reduces wolf viewing for tourists and interferes with stabilizing prey populations.

I'm not a scientist or a wolf expert so I don't pretend to know the solution for wolf management around Denali National Park. I am concerned that much of the area management seems to be dictated by others who are not experts either. Wolf management needs to be done with sound and time tested science and not favor hunters or any other groups. I am a deer hunter in the Jueau area. I expect the same scientific management for area I hunt in. I know this means that some years will offer better deer hunting than others. I don't expect game management to creat hunting preserves for me. I also don't accept anti hunting groups interfering with sustainable deer harvests. It comes back to leaving game management to real science and not politics or emotional interference.

Thanks, Mark Miller
I am writing to implore the BOG to support Proposal 142 and close the taking of wolves within the boundaries defined in said proposal.

When I was a younger man, it was a dream of mine to visit, and perhaps someday live, in Alaska. The BOG's neverending reduction of protections for indigenous wolf populations, however, has made the dream a non-starter. As long as you continue to allow the slaughter of wolves to continue, using various barbaric means, I will NEVER step foot in your state nor will I purchase any Alaskan-made products. Many I know share this sentiment.

Please stop the assault on this magnificent and familial species NOW!
I am writing in support of Proposal 142.

I am a life-long hunter and although I do not trap I respect the desire of those who do. However, when it comes to relative impotence of activities in Alaska, I would much rather see the dreams of many thousands of visitors (to see a wolf in the wild) fulfilled than the desires of a handful of trappers and hunters looking for a livelihood or simply a trophy on the wall.

There are millions of acres surrounding the Denali Park area open to trapping and it makes no sense to me to keep this narrow corridor, which is completely surrounding, west, south and east by the park, kept open for the benefit of a few versus the enjoyment of the many.

Thank you

Karl Monetti
As an Alaska resident since 1982, I have been into Denali National Park on many occasions over the last three and a half decades. One of the biggest thrills that I have had over those years was the pleasure of seeing wild Alaska wolves up close in their natural habitat. I have been a hunter in Alaska, and I support hunting as an activity when it is carried out in a legal and responsible manner. It is not responsible to allow the taking of wolves that spend most of their lives in a protected national park, but who occasionally foray outside of the park boundaries. Experience to date shows that the attrition from the take of these wolves on State lands is having a devastating negative effect on the numbers of wolves along the road to Wonder Lake. I urge you to support and vote in favor of Proposal 142, so that Alaskans and visitors alike will have a reasonable opportunity to share in the excitement of seeing these magnificent animals.
Dear Board of Game members:

I am a 35 year resident of Alaska and have worked with the tourists in Denali for four years. I urge the board to protect the valuable economic resource that wolves have become for the tourist industry.

Tourists spend a lot of money to come to Alaska and to Denali in particular to see wildlife. They are quite disappointed if they cannot see bears and wolves. They are shocked and amazed to learn that the animals they came to see are killed by trappers right on the edge of the Park.

These animals are of more value alive, not dead.

Please protect the few remaining wolves and SUPPORT PROPOSAL 142.

Thank you,

Lenora Morford

Chugiak, Alaska 99567
I write to support Proposal 142 to limit killing wolves in areas adjacent to Denali National Park. As wolves within the Park often stray outside its borders, the viability of the Park wolf population depends on some protection outside the boundaries.

I now live in Canada, where we also have issues related to protecting wolf populations from over-exploitation, but remain a citizen of the USA (as well as Canada) and spent 4.5 years of my early life in Denali NP and have visited several times since. As a wildlife biologist I am well aware of the underlying reasons for enhancing protection of wolves in Denali.

Thanks for your attention,

Jan Murie
Support Proposal 142

- There is a precedent for a no hunting/trapping area in the Stampede Corridor/Nenana Canyon. In 2001-02 the Board acknowledged that the park wolves were a valuable resource for visitors, and set aside areas closed to hunting. The park’s wolf population (Spring 2002) was 97 wolves, far more than inhabit the park now.
- The Board has both the authority and the responsibility to manage wildlife for conservation purposes. A majority of Alaskans support creation of a buffer to protect wolves in this small but critically important area.
- The wolves that frequent the Corridor/Nenana/Park Road area are an important scientific resource. They are the subjects of some of the most-famous, longest-running scientific studies of wolf packs in the country. Hunting activities which ultimately result in the loss of entire packs abruptly and prematurely end decades of research.
- We need to preserve our biological diversity and we need to preserve these species.

Thank you for your time and consideration
My name is Rick Myers. I work in Virginia for a state natural resources agency, the Department of Conservation and Recreation. I am a hunter, fisher, forester, fire ecologist, and father of teenage twins. My family visited Alaska in summer 2015 over a two week period. We were there to see and experience the last great wild place left in the United States. We visited Denali National Park, and hoped to see a wolf. We did not, but hope to return one day and have another chance.

You may appreciate that we spent $25,000 on our 2015 two-week trip to Alaska. The intact ecosystems of Alaska, which retain apex predators including wolves, provide a strong incentive for people like me and my family to come to your state to visit and spend a lot of money to experience wilderness. Wolves are the pinnacle symbol of wilderness. Without them, or with few of them, your state and our country is diminished. Their value as a draw - both now and even more in the future - for eco-tourism cannot be overstated. Their value as an animal to be taken for recreational hunting or trapping is tiny, by comparison. Especially at this time when wolf populations are at historic lows and continuing to decline, the concept of legal take of wolves as a recreational pursuit is both economically destructive and indefensible from a resource management perspective. Legal take for the purpose of protecting lives and property is one thing and that should continue. Recreational take is, I believe, both fiscally and morally corrupt; and, irresponsible and indefensible.

Folks like me that live outside Alaska and that understand the significance of functional ecosystems hope that you will see how vulnerable wolves are to hunting and trapping, and what folly it is to allow these pursuits in the vicinity of tourism destinations such as Denali National Park. Denali’s wolves are so much more important economically for tourism and your state’s economy than they are for recreational take; the difference must be orders of magnitude.

Please conserve the wilderness and wildlife in this region of Alaska. I want to come back to Denali with my kids someday, and see and/or hear wolves. Please consider and support Proposal 142.
I support closed areas around the national park to protect the wolves.
February 3, 2017

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

Submitted via email to: dfg.bog.comments@alaska.gov

Proposal #142 - Support

Dear members of the Board of Game,

The National Parks Conservation Association (NPCA) appreciates the opportunity to comment on the February 2017 Board of Game proposals. Since our founding in 1919, NPCA has been an independent, nonpartisan voice working to strengthen and protect our nation’s natural, historical, and cultural heritage. Together with our one million members and supporters, of which over 2,000 reside in Alaska, the National Parks Conservation Association speaks for America’s favorite places.

Thank you for your previous and current efforts to find a solution to the long-standing concerns regarding protection of Denali wolves when they travel onto adjacent state land. NPCA supports Proposal #142 because it is of value to the state to enhance wolf-viewing opportunities and this proposal is of modest, yet sufficient size.

State protection enhances wolf-viewing opportunity  
For decades, the state land that extends into the northeast corner of Denali (often called the “wolf townships”) has been identified as critical winter range for caribou, wolves and other park wildlife. When the Alaska National Interest Conservation Act (ANILCA) passed in 1980, the Senate report that accompanied the bill stated:

In the northeast portion of the area, near the existing headquarters, there are some 3 townships of state lands which are critical for sheep, caribou, and wolf habitat and should eventually become a part of the park.  
- 1980, ANILCA Senate report 96-413, page 167

Alaska Regional Office  
750 W., 2nd Ave, Suite 205 | Anchorage, AK 99501 | P 907.277.6722 | F 907-277-6723 | npca.org
Concerns with impacts to park wolves due to hunting and trapping in this region has similarly been a concern for decades:

*Specific concerns for the wolf townships are that the Savage wolf pack populations have dropped drastically in recent years ... Adding the wolf townships to the park would complete the habitat and range protection of the Toklat and Savage wolf packs and the wintering caribou herd.*


Since the National Park Service began monitoring wolves in the 1980s, records show that hunting and trapping on adjacent state land has severely reduced or completely eliminated numerous Denali wolf packs. Unlike mortality from natural causes, hunting and trapping tends to takes the alpha individuals. Loss of pack leaders frequently causes disruption and dispersal of entire family groups and results in a steep decline in wolf numbers, reproduction, and opportunities for viewing them. Recent examples of this include the Grant Creek family group in 2012, and the East Fork group in 2015 and 2016. When the most recent buffer was eliminated in 2010, visitors had a 45 percent chance of seeing a wolf along the Denali Park Road, but in 2015 and again in 2016, the odds had dropped to just 5 percent.

**The Board of Game has a history of protecting Denali wolves**

In 1992, the Board of Game formally recognized the value of Denali wolves to the people of Alaska and created a buffer over 800 square miles – far larger than any recently proposed buffer (please see the attached map).

*The wolves that inhabit Denali National Park are a valued resource of the people of Alaska and the United States. ... The creation of Zone 2 lands in the lower Yanert River and Healy Creek drainages ... will adequately protect these wolves from hunting, trapping and control.*

- Findings of the Board of Game, No. 92-64-BOG, paragraph #8

The 1992 buffer was eliminated shortly after it was created for political reasons and then numerous buffers followed from 2000-2010. These buffers were helpful, but not large enough and losses of park wolves continued. NPCA supports proposal #142 because it is a reasonable size (mid-way between previous BOG buffers) and will provide sufficient protection. We appreciate the Park Service’s effort to address this issue, but believe proposal #141 is too small to fully address the issue and doesn’t protect Denali wolves during the winter months.

**Protecting Denali wolves is in the best interest of the state**

The Alaska Department of Fish & Game manages wildlife for a diverse set of purposes including both consumptive and non-consumptive uses. The department’s wolf management report lists human uses for wolves in Interior Alaska to include “hunting, trapping, photography, viewing, listening, and scientific and education purposes.” There are few places in the world where wolves can easily be seen in the wild and Denali National Park is one of those unique places. Alaskans and visitors alike place a high value on watching wildlife, particularly wolves.
wildlife is one of the top reasons visitors say they choose Alaska, and these visitors support a vibrant tourism economy that employs many Alaskans and supports local businesses. In 2015, 560,000 Denali visitors contributed over $500 million dollars to the local gateway economy.

Just as the state protects the bears of McNeil River, protecting some of the most viewed and photographed wolves in the world at Denali is of benefit to the state of Alaska.

Thank you for the opportunity to comment.

Sincerely,

Joan Frankevich
Program Manager

Alaska Regional Office
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February 3, 2017

Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526

Submitted via email to: dfg.bog.comments@alaska.gov

NPCA member comments in support of Proposal #142

Dear members of the Board of Game,

The National Parks Conservation Association (NPCA) is a nonprofit advocacy organization dedicated to protecting and preserving America’s national parks. Recently we sent a message to our members asking for their support of Proposal #142. Our members care deeply about national parks and wildlife and we received an especially large response to this message: 16,267 took action and sent the message below. Additionally, 1,280 of those who responded also added their own personal thoughts and comments. For your convenience, we have summarized the results here.

Over 16,000 NPCA members responded and sent the following letter:

Subject: Denali Wolves Should Be Seen, Not Hunted. Support proposal #142.

Dear Alaska Board of Game,

I value national parks and appreciate the ability to see wildlife in our nation's exceptional natural places like Denali National Park & Preserve. It's a rare opportunity to see a wolf in the wild, and Alaska's national parks are some of the best places to do so. I support proposal #142 so that future generations can continue to see wolves in Denali.

One of the primary reasons people like me choose to visit national parks is to see wildlife in its native habitat. I ask that you please support proposal #142 to protect Denali’s wolves and the opportunity for Americans from across the country to see them in the wild.

Thank you for your consideration.

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Excerpts from some of the 1,280 personal comments added to the above letter:

On a visit to Denali National Park, I had the good fortune of seeing three wolves near a creek. I was able to watch them, from a safe distance, for a while. On the same day, I saw a grizzly sow with her cub. As of that time, I had spent most of my life living in Indiana. Perhaps you will understand when I tell you that this was a special day in my life; a day I shall always cherish.

- Ms. Janet Parsanko
  Billings, MT

Most importantly, I value the Alaskan experience. As a 23-year Alaskan hunter, fisherman, outdoor writer, and wildlife biologist, and one who saw an entire wolf pack with all my bus mates one trip out into the Park, I recognize the value of protecting a few populations so that others can see the wonders of the wild lands of Alaska.

- Mr. Jeff Fair
  Palmer, AK

Wolves also are an important component to the Denali ecosystem. Witness what the introduction of wolves did for Yellowstone Park. Yellowstone had been transformed to a healthy ecosystem. Damage that had occurred due to the imbalance was corrected.

- Ms. Kristine Hutchin
  Eagle River, AK

I was blessed with the opportunity to live and work in Yellowstone National Park this summer. It was an amazing experience to see wolves for the first time in my life. It was very interesting to see the thousands of people who came just to watch and photograph these wolves.

- Ms. Lydia Kennedy
  Vero Beach, FL

Denali is one of the most beautiful places I have ever seen, and its wild creatures are essential to its charm.

- Dr. Marguerite Shuster
  Sierra Madre, CA

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When reflecting on this issue, please weigh the value of tourism dollars to the Alaskan economy. This sustainable income source is largely driven by the icon image of the wolf and the possibility of seeing these majestic creatures.

- Miss Melissa Sanderson  
  Casper, WY

As an Alaskan I would hope you would represent the interests of all citizens in the State.

- Ms. Linda Shaw  
  Juneau

Wolves are an essential part of a healthy eco-system by maintaining the genetic health of the prey species as well as helping to preserve a biologically-sustainable prey population level. Multiple studies within the National Park System and outside of it have well-documented the constructive role of this iconic predator.

Besides the wildlife scientific aspect, one of the primary reasons people like me choose to visit national parks is to see wildlife in its native habitat. My family greatly enjoyed our visit to Yellowstone for that reason alone, which included wolf and grizzly sightings.

I urge you to support proposal #142 to protect Denali's wolves and the opportunity for Americans from across the country to see them in the wild as well as maintaining a healthy Denali eco-system.

- Mr. Don Robinson  
  Chester Springs, PA

My wife and I have spent some time in Denali and truly think of this as one of America's crown jewels. All wildlife is valuable and the wolves need our protection.

- Mr. Mark Bloch  
  Anchorage

I intend to go to Alaska and I would hope to see wolves.

- Ms. Sheila Swigert  
  Staten Island, NY

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“The movement for the conservation of wildlife and the larger movement for the conservation of all our natural resources are essentially democratic in spirit, purpose and method.”
-- Theodore Roosevelt

- Mr. Christopher Lish
San Rafael, CA

Continuing the current policy of allowing hunting and trapping of wolves outside Denali National Park has significantly impacted the wolf population. As a result the chance of being able to see wolves in their natural habitat has also decreased. With the current challenges to Alaska's economy, tourism dollars are increasingly vital to the health of our economy.

- Sandra Ryan
Anchorage

Spent a whole summer in Alaska in 1976. Not once did I see a wolf. My second visit was with my daughter when she was about 6 years old. No wolf sightings and we were camping out, not staying in a hotel. Then when she married she and her husband went to Alaska for their honeymoon. They went to Denali again, no wolf sighting. Trust me, people go to Alaska to see wildlife and the beautiful environment.

Now my daughter has a little girl. I wonder how things will be for her generation. Please do current and future generations a service and support proposal #142.

- Joan Estes
Canyon, Texas

There is much more area available for hunting and trapping if that is what someone desires. Let the estimated half million visitors at least have the hope of seeing a wolf in the wild...the symbol of wilderness.

- Ms. N J Gates
Denali Park

I went to Denali two years ago for the purpose of seeing wolves and did not see one.

- Ms. Diane Weinstein
Issaquah, WA

I have personally been to Denali National Park twice already and have seen wolves from a distance both times. I am hoping sometime in the future to be able to repeat that experience.

- Mrs. Linda Sutherland
Ballwin, MO

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Seeing the Wolves is one of the main reasons we took a tour of Denali park. We were fortunate six years ago to see one.

- Ms. Sue Habecker
  Lebanon, PA

As a fifty-year resident of this wonderful State, I thank you for your consideration.

- Ms. Dianna Ligus
  Anchorage

This desire to see wolves in their native surroundings is #1 on my "Bucket List." That & the uniqueness of your incredible State.

- Linda Gooding
  Cadiz, Ohio

Thank you for considering the viewpoint of NPCA members from across Alaska and across the country.

Sincerely,

Joan Frankevich, Program Manager
on behalf of NPCA members and supporters
I visited Denali Park as a tourist recently, and it is one of the highlights of my life. I had the privilege of seeing a wolf in the wild. The wolf was walking down the main road during the day, and it was an extraordinary stroke of luck to see him. The leader pair of the last remaining wolf pack in Denali National Park had been killed when they were roaming out of the park, and the pack had broken up. The chance of the wolves surviving without their leaders to pass down their considerable knowledge was quite slim. The wolves are a main attraction to tourists, and their loss could impact tourism in the park. Please do all you can to preserve this precious resource that is so quickly disappearing. Thank you, Dana Nearburg
I write in full support of proposal 142. I work as a naturalist and hiking guide in Denali National Park, and have been a lifelong Alaskan. I see wolves as the epitome of a wild and healthy ecosystem. The guests I guide are always asking to see a wolf in Denali, and to them wolves symbolize a breathtakingly natural environment. Even if the data as of today does not claim that hunting and trapping wolves outside the park boundaries impacts the visitor experience inside the park, I still want to help the Alaskan wolf population thrive for the awe inspired in people, and the presence of a thriving natural habitat.
Wolves around Denali Park, Proposal 142

I fully support the proposal to prohibit the killing of wolves who populate Denali Park and its surrounding lands. I understand this proposal is similar to a previous ban which seemed to contribute to an improvement of the wolf population and survival of the Denali Wolf packs, and that support should be renewed.

I have been to Denali on four different occasions with 3-generations of family, a father, a brother, my wife, some Alaska canoe partners, and most recently my grandson. We have stayed for several days inside the park on 3 different occasions, and just outside the park on three of those trips, including one bus trip to Wonder Lake.

The Park is a wilderness that needs to be protected, with the wildlife to remain as an attraction. The Wolves and Bears, and Caribou, and Moose, and Sheep and the rest of the wildlife there all create exciting memories, and all should be part of a natural balance of nature. Allowing human interference with a detrimental impact should be discouraged. Action which supports a dwindling population should be encouraged. Denali Wolves should be protected from hunting and remain a viable part of the park and its future qualities.

When wolves leave the Park for such reasons as following Caribou migrations they become vulnerable to human depredation. It is most appropriate to leave the wolves free and allow them to remain a part of the wilderness environment that the Denali Park represents.
Submitted By
William Nichols
Submitted On
2/1/2017 9:40:08 AM
Affiliation

Phone
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Email
labradortea@yahoo.com
Address
63 East St.
Littleton, New Hampshire 03561

My first siting of a wild wolf was on a trip to Camp Denali not far from the Illeson Visitors Center. It was a most memorable experience for me and as I tell others of this event creating a desire for others to visit this wonderfully wild place. Excited reports to the population back home = more tourists = tourists bring money to AK = tourism is a clean industry.

Another concern of mine is the wildlife crossing from protected Park land into state land where trapping & hunting jeopardises their well being.

I trust that my feelings for the support of Proposal 142 to the Region III hearing will become part of the record.

Respectfully, William Nichols, 2/1/17
A few years ago I had the opportunity to spend several days in Denali Park. Because of the wildlife I saw it remains the trip of my lifetime, and I’m nearly 80. Among the Park’s many wonders are the wolves. Since they don’t appreciate boundaries we might draw on a map, they are bound to sometimes stray outside the protection of the park. So, I strongly urge you to adopt proposal 142 and protect the wolves from human predation in the areas designated.

Thank you.

Francis H Noedel

Bainbridge Island, WA
Dear Sirs,

I am writing to urge you to reinstate protection of wolf populations in the Stampede Road area and to the east of the Park entrance. I visit Alaska and Denali National Park every few years and feel strongly that the presence of wolves in the park is not only vital for the balance of nature, but that seeing a wolf in the wild, is also a source of great pleasure to the park visitors. It is a shame that a handful of hunters and trappers are allowed to kill the Denali wolves when they stray outside of the park thereby depriving so many of the chance to see one in the park. I hope you will decide in favor of the many who come so far to witness the beauty of Alaska and its wildlife. I am sure you realize that these visitors also spend a lot of money and create a lot of jobs in your state.

Best Regards,

John Nordstrom
Numerous studies demonstrate that wildlife watchers far outnumber hunters and trappers and bring in many times more revenue than hunting and trapping. Especially in this time of economic hardship for Alaska, it only makes sense to support a buffer area for Denali. As an Alaskan for almost 50 years I’ve been fortunate to visit Denali and see wildlife including wolves and bears several times. But for tourists, photographers, and videographers, seeing wildlife, especially the larger ungulates and carnivores is a big deal. Our wildlife ranks as one of Alaska’s biggest draws, perhaps the biggest.

With bear baiting now allowed, the number of carnivores that can be viewed from the road in Denali, especially wolves, has dropped. It is humiliating for Alaskan’s when a trapper brags to a National Geographic photographer that he spoiled wildlife viewing for thousands of tourists. Many of us count on tourism for a living. Do the right thing and pass this or the previous proposal for a Denali buffer zone. Wildlife watchers, including those who wish to view and photograph carnivores, should have the chance of their lifetime to view these marvelous creatures.

Thank you for considering my comments.
We fell in love with Alaska on a vacation in 2014. We stayed at the North Face Lodge in backcountry Denali and appreciated the unique opportunity to view wildlife in their natural environment. I am writing to support Proposal 142. We believe it makes sense to preclude hunting and trapping of wolves on distinct areas of state land adjacent to Denali National Park and Preserve, game management units 20A and 20C.

Wolves—which are internationally important to tourism as well as science—are vulnerable to hunting and trapping when they cross the park boundary onto state land. Intact, diverse animal populations are important to the regional and state economy. Revenues from tourism to Denali National Park are of greater value to the State of Alaska than the hunting and trapping licenses sold for the take of wolves on adjacent state lands.

We understand that the responsibility of the Alaska Board of Game includes conservation of the wilderness and wildlife in this region and hope that you will recognize the importance of Proposal 142 to fulfilling that responsibility.

Thank you,
Deborah Oestreicher and Victor Magar
Submitted By
Susan Olsen
Submitted On
2/1/2017 5:09:31 PM
Affiliation
interested citizen who cares for wildlife
Phone
907-277-9968
Email
soeh@alaska.net
Address
8601 Sultana Drive
Anchorage, Alaska 99516

I urge your support of Proposal 142 which requests the BOG to restrict hunting and trapping of wolves on state lands adjacent to Denail NP & P. The reasons for support are many. First, the BOG has a responsibility to manage Alaska’s wildlife for the benefit of the animals themselves as well as the public at large. And, the public is not just made up of hunters and trappers of wolves, but the vast, vast majority do not hunt or trap and wish to have the opportunity to observe wildlife in its natural habitat. Secondly, these wolves do not threaten subsistence resources so predator control is not involved. Thirdly, the economic benefit of wolf viewing in the Park far exceeds any economic benefit received by the very hunters and trappers who sell wolf pelts and I am not aware of any requirement in Alaska statutes which mandates BOG to preserve the hunting and trapping lifestyle at the cost of the wildlife itself. Fourthly, there is no question that wolves which den in the Park do wander onto the state lands in question; that the oldest studied pack has been decimated in the last few years and only by establishing a buffer zone on such state lands does the wolf population stand a chance to be revived.

Thank you for cosidering these comments.
Support Proposal 142

Hello,

I urge you to protect the Denali wolves as, we are planning a trip to the area and would like the ability to see these incredible creatures. A no hunting/trapping buffer would help the wolf populations and increase the enjoyment of our trip (and future trips).

Thank you for your time.

Mark Olson
I SUPPORT PROPOSAL 142 TO ESTABLISH A NO HUNTING/TRAPPING BUFFER ADJACENT TO DENALI NATIONAL PARK! SAVE OUR WOLVES ☮! THEY DESERVE PROTECTION NOT DESTRUCTION!
Please support Proposal 142.

Wolves are an important part of the American landscape. A buffer area is needed to protect them.

I've visited Alaska and loved it, more than anything for its friendly people and its beautiful wildlife. I want to come back again, and a chance to see a wolf is a dream. Since the chances of seeing a wolf have fallen so far since 2010, this buffer is essential.
I have been fortunate to travel the world and see many amazing sights. The one that stands out the most in my travels is a family of wolves in Denali National Park. The family's interaction with the pups, the sub adults and the alpha's was something I will never forget. These wildlife sightings bring such joy to the Park visitors, it is a shame that most visitors will not have the opportunity to view these wolf families.

Please support Proposal 142.

Thank you,

Sincerely,

Gloria Oswald
Submitted By
Sylvia & Marius Panzarella
Submitted On
2/3/2017 12:34:38 AM
Affiliation

Phone
907-334-9291
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Address
7022 Tanaina Dr.
Anchorage, Alaska 99502

SUPPORT PROPOSAL 142

We strongly urge the Board of Game to establish a no hunting/trapping zone or buffer next to Denali Ntl. Park. If ethics do not inspire you to act then tourist dollars lost to poor planning by this Board should. Many experienced and long respected biologists have led to these conclusions and have been mocked by some of the trappers you seem to be protecting. Remember the quotation "Pride goeth before a fall". Be that person who stands up to support Proposal 142. Don't let your pride or someone else's stop you.

Happy Trails,
Sylvia & Marius Panzarella
In support of Proposal 142, I ask you to please make the Stampede corridor and Nenana canyon safe for wolves. It isn't right to allow the destruction of any wolves based in Denali that make use of adjacent areas, and especially this particular pack, which as you know has been studied since 1939. Please do the right thing and give these wolves the protection they deserve, thereby giving park visitors a chance to see them. Thank you.
Numerous wildlife management decisions are based on providing opportunities for hunters, while the importance of wildlife viewing is frequently overlooked or underestimated. We both have graduate degrees in Wildlife Management and understand the pressures of trying to please people with vastly different viewpoints about wolves and other wild animals.

We have worked seasonally in Alaska for 31 years in the tourist industry. At one time we lived just outside of Denali National Park, and for a number of years had jobs within its boundaries. We currently work seasonally in Southeast Alaska. On the special occasions when we have seen a wolf, it has taken our breath away to watch such a magnificent symbol of wildness pass through our lives.

Most people on our planet will never see a wolf, but Alaska is one of the remaining locations where that is still a possibility. The state is highly dependent on tourist dollars. According to The Alaska Resource Development Council, direct visitor spending in Alaska is $2.42 billion. Many of these visitors, as well as state residents, would love to see a wolf. We encourage you to do whatever you can to increase the chances for this opportunity. Supporting Proposal 142 at your Region III meeting later this month is a good step in that direction.

Sincerely,

Gretchen and Robert Pederson
i strongly support prop 142... i am a frequent visitor to Denali National Park. i save money every year specifically to visit the park and take the chance to hopefully see and photograph the wolves there. with each year i have been less fortunate to see them and it really saddens me. please do anything you can do to ensure the habitat in and around Denali for future generations to come..
I SUPPORT PROPOSAL 142 TO ESTABLISH A NO HUNTING/TRAPPING BUFFER ADJACENT TO DENALI NATIONAL PARK!

I don't care what state one is from, the majority of visitors come to see the beautiful wolves. They spend a lot of money for that opportunity. No wolves - or news that the state routinely allows wolves to be killed adjacent to the park for lack of a very limited buffer area - are black eyes for Alaska tourism. I think Alaska needs to realize the true value of this beautiful iconic animal.
I fully agree with and encourage the Board of Game to adopt the DCC-AWA Proposal 142 regarding the closure of the Stampede Townships and Nenana Canyon. I regard the NPS Proposal 141 as too limited. Having visited Denali Park a number of times, driving al to Kantishna and back, I have seen first hand how the wolf population in the park has significantly diminished. The facts and evidence linked to the Stampede Townships and Nenana Canyon hunting/trapping and the decline of the wolf population in the park are credible, clear and convincing. I the Board of Game's past and current position on this matter is the primary cause for this decline. The Alaska Constitution applies to all of the residents of the state, not just the hunters, it is time the Board of Game recognizes that fact.
For three summers, I worked in Denali National Park and witnessed the transformation that occurred when people saw their first wild wolf. People were thrilled to see these iconic animals in the wild and many had waited and saved their whole lives to travel to Alaska and witness these incredible animals in their native habitat.

I support proposal #142 to protect Denali’s wolves and create a protective safe zone.

I worked in environmental education for years, and I know how important it is for people to have experiences with wild places and see magnificent animals in the wild. Time in nature is also proven to provide significant health benefits.

Many tourists travel to Alaska specifically to see wolves and other charismatic megafauna, and proposal #142 will help interior Alaska’s tourism economy thrive. At a time when Alaska’s economy is facing a downturn, this is especially important.

Thank you for your consideration.
I urge you to approve Proposal 142, the creation of areas of no hunting and trapping of wolves on distinct areas adjacent to Denali National Park. The economic benefits of preserving this unique population of wolves for conservation and tourism far outweigh the value to a few who hunt and trap these wolves for their own profit. Most tourists (and Alaskans such as me) visit Denali specifically to see wolves, along with the other mammals and birds in the park. The wolves do not recognize the park boundaries, and to continue to hunt and trap them so close to the park will only lead to their complete elimination. Please preserve these valuable resources for all of us.

Thank you.

Susan M. Pope
oppose to Proposal 142

As two visitors of Camp Denali from far away (Germany) I am very much interested in the subject wolves to be seen further along in this region. And I do think it's important having an intact, diverse animal population to the regional and state economy. It is of greater benefit to the State of Alaska having the revenues from tourism to Denali National Park than the hunting and trapping licenses sold for the take of wolves on adjacent state lands.

And please remember as the State Board of Game it is your responsibility and authority to conserve the wilderness and wildlife in this region not only for us but for the future generations as well.

Carola Preuss and Dr. Klaus Ruge, Biologist
I am writing to voice my support for Proposal 142 which protects both my livelihood as an Alaskan and my values. The economic, ecologic and spiritual advantages of protecting wolves on GMU 20 are clear. Wolves do not adhere to park boundaries and as such, should be protected in lands that surround park boundaries as well. The economic importance of wolves - that is - the tourism dollars specifically tied to the possibility of wolf sightings in and around Denali National Park at significant, and support my livelihood as a guide specifically. Additionally, wolves are an integral part of a healthy, dynamic and intact ecosystem and thus their protections is essential. Lastly, the presence of wolves reminds us of what it means to be human, to be a part of this great and wild land we call Alaska. I trust the board will prioritize Alaska’s economy, ecosystem and all Alaskans by protecting wolves in GMU 20 by pasing Proposal 142.
To whom it may concern:

We need to protect the stampede corridor in order to protect Denali Park's wolves. These wolves are at risk from both hunting and trapping, when they take forays onto state lands at the northeast boundaries of the park. These wolves are internationally important for tourism and scientific study. It is the absolute responsibility and authority of the Alaska Board of Game to provide conservation on state lands in this region.

As a guide and bus driver in Denali Park I have the pleasure of observing the wildlife every summer. I can tell you that over the past 5 years I have seen very few wolves. Every guest on my bus asks the same question "do you think we will see wolves?" and every summer I have to explain why their populations have been going down with each passing year. People come from all over the world to see these animals. Please take this opportunity to protect our wolves.

Thanks you.

Marianne
Submitted By  
Eileen Quinlan  
Submitted On  
1/31/2017 4:30:42 PM  
Affiliation  
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To the Members of the Alaska Fish and Game Board:  

Please be aware of importance of wildlife diversity including wolves ~!!!  

There is a vulnerability of wolves to hunting and trapping when they cross the park boundary onto state land.  

Please keep in mind the international importance of Denali’s wolves to tourism and science. The greater benefit to the State of Alaska are the revenues from tourism to Denali National Park than the hunting and trapping licenses sold for the take of wolves on adjacent state lands.  

Thank you for your time and attention!  

Eileen Quinlan  

-it is your Alaska Board of Game”s responsibility and authority to conserve the wilderness and wildlife in this region.
To The Alaska Board of Game,

I have only lived in the Denali area since 2008 but have come to recognize how important the Park and the wolves that spend time in the park are to not only the visitors that come from all over the world, but to the many seasonal and permanent employees of the area that make a living from the tourism industry. Wolves do not know the boundaries that we have established yet scientific data does show the likelihood of the presence of the most visible wolf packs to both Alaskans and visitors to our state. It follows, that there is an economic interest, indeed perhaps a greater interest to the state as a whole to set aside lands that are not open to hunting and trapping to provide this experience for both Outside and Alaskan tourists. In the past several years, hunting and trapping have had a profound impact on the viewability of wolves in Denali National Park, as these wolves have spent time outside the protected areas of the park in the winter and spring, when pregnant females especially are at risk of being taken. Though fears arise about extending protections, it should be noted that these protections existed previously, and worked for all parties—hunters, trappers, and park visitors. It is the responsibility of the Board of Game to not only provide hunting and trapping opportunities, but also conservation, especially of such well studied packs as those that spend time in the park. Thank you for considering my comments in your deliberation.
I am a resident of the Denali Borough, and live outside of Healy on the Stampede Road. I am writing to encourage your discussion and approval of proposals 141 or 142, related to a closure of wolf hunting and/or trapping in the Stampede Townships. I also encourage you to oppose proposal 72, related to predator control throughout the region, specifically in Subunits 20A and 20C.

Tourism is a vital part of our local economy. Tourists from around Alaska, the nation, and around the world visit this area. A substantial part of this draw is to view wildlife. The income from bed taxes that the tourism economy provides our local government is the bedrock of our Borough’s financial status, and a critical aspect of our local economy. Tourism income has a larger influence on our local economy than any other industry. This tourism is largely dependent on the protection of an intact ecosystem, which Proposals 141 and 142 seek to protect. Research by the National Park Service has directly addressed concerns that the Board of Game raised when the previous closure was eliminated. Will the Board of Game respond to this scientific research?

While I understand that there is reluctance by the Board of Game to even consider proposals to close or limit wolf hunting and/or trapping (as evidenced by previous actions), I also understand that it is wolf viewing opportunities, in an intact ecosystem, that supports our local economy and way of life. I encourage the Board of Game to step away from the political aspects of this issue, and consider the science and non-consumptive allocation issues that these proposals focus on.

I recognize that many in state management positions fear “giving” anything more to the federal government. However, I currently see the National Park Service attempting to protect local interests more aggressively than the state is. It is the federal government that provides funding for our local economy (based on tourism income, bed taxes, directly related to Denali National Park). It is also the federal government that provides a bulk of the scientific research that exists on local wolf populations. While the state does little to monitor wildlife populations in this area, the National Park Service provides extensive reporting on their research. This research shows that hunting and trapping of wolves near the boundary of the National Park, particularly during the breeding season, directly impacts the viewing of wolves and pack dispersal. This evidence is what the state asked for when the Board of Game refused to renew or reconsider a wolf trapping and hunting closure on Stampede when the last closure expired. This research from the National Park Service, more extensive than anything the state has produced, also makes clear that the fall wolf population density has been below what the state itself has set for wolf density in recent years (see the NPS research at https://www.nps.gov/dena/learn/nature/upload/Denali-wolf-population-508-compliant.pdf, in comparison to the state Wolf management report of survey-inventory activities, 1 July 2008–30 June 2011 at http://www.adfg.alaska.gov/index.cfm?adfg=librarypublications.wildlifepublicationsdetails&pubidentifier=1145, the latest summary of state management objectives).

The above reasons I have provided in support of resolutions 141 and 142 also support my reasons for opposing Proposal 72, related to expanded opportunities for predator harvest in this same area.

Will the Board of Game consider science and non-consumptive uses, or will you pass the buck once again and refuse to even discuss this issue? I hope the former.
AS A WILDLIFE PHOTOGRAPHER I SUPPORT PROPOSAL 142 TO ESTABLISH A NO HUNTING/TRAPPING BUFFER ADJACENT TO DENALI NATIONAL PARK! I WOULD LIKE TO RETURN TO ALASKA AND DENALI AND THE WOLVES ARE A BIG ATTRACTION AND DRAWING CARD.
Alaska Board of Game:

I am asking you to support Proposal 142 that would establish a no hunting or trapping buffer adjacent to Denali National Park.

Thank you,
Dane Reyner

I could go on and on about the horror of legalized animal cruelty, but it is obvious that you don't care.
In order to support a healthy ecosystem in Denali Park it is vital that you act to protect the wolves of the park by passing 142. Visitors from all over the world come to the park to witness the wildlife. It will be a great disappointment to visitors if the ecosystem is allowed to deteriorate due to lack of action by the state of Alaska.
For some reason, unknown to me, the presence of wolves in Denali National Park is highly unappreciated and undervalued by a very small group of hunters and trappers in the area.

A great part of the local economy is based on tourism and one of the reasons people visit Denali National Park is to see and appreciate these very renowned wolves that have been in the Park since its inception.

Unfortunately, animals know nothing of boundaries and when they stray across the border, it appears guns and traps are ready for them. Why is the annihilation of animals such a priority in the minds of a few people who hunt and trap. Alaska has the chance to avoid the history of the lower 48 where animal populations were literally extirpated and had to be eventually reintroduced.

Why not give the wolves in this International Biosphere and chance to be admired and appreciated. There are plenty of other places to hunt and trap. Locals need to open their eyes to the value of these animals for enjoyment, appreciation and realization that their welfare is dependent largely on tourism and wolves are a part of the big picture of the DNP region.

Wolves are part of the intact ecosystem for which DNP is famous. They keep balance in other animal populations and provide opportunity for internationally important research that is valuable to wildlife biologists around the world.

Fish and Game has a moral responsibility to stop the carnage of these animals that stray across the very convoluted border in the Healy area and give them a chance to live and propagate. For hunters and trappers, I say find another area to shoot and trap. How about a little appreciation for wildlife. You do not have to hunt and trap every moving creature in the environment. They all have a place in a balanced ecosystem.

I urge you to support a safe haven for these very admired animals and take your guns and traps to other areas where tourism and scientific research are not a focus and let the Park be a safe haven for tourism and appreciation for this very rare ecosystem that is being destroyed by the wonton destruction of the wolf population.

Jerri Roberts
Please vote in favor of proposal 142 to establish a no hunting/trapping buffer next to Denali National Park. I have lots of family and friends who travel long distances to visit Alaska because of their interest in viewing wildlife. Wolves are an especial favorite, and Denali National Park used to be one of the most reliable places for them to see these creatures. Many tourists share the same interest. But in recent years, their likelihood of seeing wolves has decreased dramatically. The wolves that traverse the Corridor and Nenana areas are the same wolves which most often den and/or hunt near the Park Road - the wolves most easily seen by visitors. The percentage of visitors lucky enough to see a wolf plummeted from nearly half in 2010 to about 4 percent in 2015. Please reestablish this buffer zone to ensure that visitors to our state continue to be enthusiastic about us as a wildlife viewing destination. As oil revenues dry up, we need to actively support a robust tourism economy. Taking this step would be a big move in the right direction. Thank you.

The proposal was written and submitted jointly by AWA and the Denali Citizens Council.
Submitted By
Lydia Rogers
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1/31/2017 5:32:59 PM
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We are writing in support of creating a no wolf-take zone in the portion of GMUD that is adjacent to Denali National Park. Our visit to Denali National Park about five years ago remains the trip we remember the most vividly and fondly. A significant part of that experience relates to being in a place where wolves can lead their lives successfully. A stable wolf population affords the public the chance in a life time to view wolves, the iconic symbol of wildness, in their natural habitat. Maintaining a healthy wolf population is also the key to sustaining the many people who directly and indirectly receive renumeration related to this kind of tourism. Please enthusiastically support this proposal. Sincerely, Burt Adelman and Lydia Rogers
I have been a visitor to Denali Park since 1982. I have cherished the opportunity to back pack, hike, bicycle and travel through the park since that date. I grew up in Los Angeles, and thanks to my parents love of the wild outdoors, I had the good fortune to visit most of the major National Parks in the western US. Because of our visits to the wild lands of the west, I chose to move to Alaska, and lived there from 1976 through 1996 when I moved to New Mexico. My wife and I still visit the park, and our cabin adjacent to Camp Denali. I am very clear that one of the strong reasons people come from around the world to visit Denali is to experience nature and wild lands and wildlife unimpacted by the human species. Wild lands without its total collection of wild life is no longer wild, and no longer special compared to the majority of the planet now suffering from human impact. I have seen first hand the impact of hunting adjacent to the park, and the significant reduction in wolf packs and size result in significantly less wolf sightings inside the park.

The wolf is an iconic species, for all too long vilified by our culture. Until we can accept all of nature’s critters as co-inhabitants of this planet, and live with them in peace, can we be peaceful ourselves. For people to watch and understand the wolf, its habits and activities is to learn how to understand the world we live in and how we too can live in balance.

Proposal 142 is essential to support the health of the wolf populations inside Denali specifically and to reduce the impact of hunting and trapping adjacent to the park. There is now strong scientific data clearly stating the devastation impact hunting has adjacent to National Parks, both in Alaska and the lower 48.

The role of the Board of Game in my mind is to first and foremost maintain significant populations of all game in Alaska. The first guiding principal of the Board is to "Provide for the greatest long-term opportunities for people to use and enjoy Alaska’s fish, wildlife, and habitat resources”. It is clear to me and to scientific research that the largest number of people who use and enjoy Alaska’s wolves are visitors to Alaska’s national parks. Alaska without wolves, bears and whales is an Alaska many people will no longer value to visit.

In the words of a family visiting Denali National Park many years ago said to me "when I live in the city I only think about living in the city, when I am here I think about what it is like to live on a planet". This perspective has now become critical for humans if we are going to be able to maintain this planet as our home.

Carl Rosenberg
I oppose Proposal 142. Wolves do not respect human-drawn boundaries, and are susceptible to hunting and trapping when they cross the park boundary onto state land.

As a former naturalist guide in Denali, I understand the international importance of the Delta pack to tourism as well as to science. The rare presence of intact, diverse animal populations is invaluable to the regional and state economy. Hunting and trapping licenses sold for the take of wolves on adjacent state lands do not bring in as much revenue as the entire eco-tourism industry of the area.

It is the responsibility and authority of this governing body to conserve the wilderness and wildlife in this region.

Thanks for your time.
Wolves are an intrinsic part of your eco-system and are what draw tourists to your area. From 97 in number back in 2002, they are down in number and in danger of disappearing entirely. This is horrible for those of us who love wildlife - and have visited Alaska because of this - but bad for you as more and more of us refuse to visit your state because of the actions you are taking. I will not support a state/region that mistreats its ecology, its people and animals. My family has already stopped visiting your state until the Board takes a more progressive attitude towards wolves and realizes that they are a necessary part in keeping your entire ecosystem in balance. Killing them will just jeopardize the nature balance with other species and create even more problems. When will people learn to leave nature take its course. Killing is not the answer! Leave the areas around the park alone and let wolves roam there freely.

 Hunters have enough ground elsewhere to pursue their activities. Do not let them lead wolves, a beautiful animal, to extinction.

Sincerely,

Diane S.
As the Bus Dispatcher for many years at the Eielson Visitor Center in Denali National Park, I commuted almost daily 13 miles between the Toklat Road Camp and Eielson, most often by bicycle. During this time, the Grant Creek pack began denning about a mile from Toklat, in a heavily used wilderness corridor just below the Park Road. They were marvelous. If I didn’t see something amazing, I heard about it from the guests coming into the Visitor Center. There were literally thousands of people witnessing stalking, chasing, hunting, feasting and howling on a daily basis. One young female pup in particular began learning to forage for her own food by digging up the overpopulation of ground squirrels who were (and still are) excavating the cinder block foundations around the Toklat Road Camp. On more than one occasion I’d come outside to get my bike, and she would be busy digging under a log trying to get her breakfast. I’d say, “Good morning,” and ride away. She’d watch a second, then go back to getting breakfast. A co-worker once awoke to several wolves on the picnic table outside his front door, howling. We all fell in love with the little buggers. That female pup grew up to inherit the position of alpha-female of the Grant Creek pack.

One summer, then First Lady Laura Bush and her daughters came to visit Denali National Park. Camp Denali bought a fancy new van, and everyone was making a big fuss. While riding back to Toklat from Eielson one afternoon, the van passed me going in the same direction. Then it stopped to view wildlife and I passed it. This happened a couple times, and to be honest, it was really fun riding my dilapidated bicycle, waving back to the President’s wife and kids each time. Then, at the Stoney Creek bridge, another group joined our caravan, just behind the First Lady’s van, and just in front of me. It was the new alpha-female and her entire brood of baby Spring Pups! So there we all were, First Lady and her brood, the alpha-female and her brood, and me bringing up the rear of Denali’s most popular wolf pack ever… waving and smiling.

A couple years later, the alpha-female was killed. The alpha-female’s hide had been destroyed by wolverines. Her hide was useless. She was killed for nothing.

to think that simply killing wolves is beneficial, as it allows for larger moose and caribou populations. Is that what we call modern Big Game Hunting? If the Cleveland Browns decided to simply murder players from all the other NFL teams, would they earn the Lombardi Trophy at last? By killing the competition, it is no longer Big Game Hunting in the Wilderness, it’s ranching, it’s farming, it’s an English pheasant shoot. Might as well gun down dairy cows in a field.

The Grant Creek pack is gone. Wolf sightings in Denali are rarer than ever, the wolves avoid the road and people. Thousands of excited visitors are now noticeably less excited. And every year we hear about another local wolf being killed in what used to be a safe haven. Laura Bush’s wolves are dead.
Wolf Haven International supports proposal 142 to establish a no hunting or trapping buffer adjacent to Denali National Park. The wolves that frequent the Corridor/Nenana/Park Road area are an important scientific resource. They are the subjects of some of the most-famous, longest-running scientific studies of wolf packs in the country. Hunting activities which ultimately result in the loss of entire packs abruptly and prematurely end decades of research. We respectfully ask that you pass and implement proposal 142 which will continue to contribute to the important body of science relating to wolf pack family dynamics.
I support Proposal 142 for establishing protected habitat for wolves.
Dear Board,

I am writing to express my support for proposal 142 which allows for a buffer of wolf protection from hunting and trapping outside of Denali National Park. I am a hunter myself and generally support game and fur bearer management using hunting and trapping as management tools. However, I also a viewer and appreciator of wildlife and recognize Denali National Park as one of the few remaining areas in the world with an intact ecology, functioning with a complete composition of large mammalian predator and prey species. Wolves are absolutely vital to that functioning ecology.

Furthermore, the value of viewable wolf packs should not be underrated for both an economic incentive for visitors to come to Denali and for the sheer experiential quality of seeing a fully functioning pack of large carnivores. Personally, as a former naturalist / guide for Camp Denali, I can say that following the activities of a highly viewable pack of wolves throughout the season in Denali is at the top of my list of valued and inspiring experiences in nature. I'm sure many other visitors of the park could say the same. It is rare to be able to see wolves in the wild, even where they exist. Denali is arguably the best place to view wolves in North America. It's certainly the best place I've ever been to see them, including Yellowstone National Park. These wolves are now few and are much more valuable, on every level, alive than their pelts would be after harvest. This should not be viewed as taking away the rights of hunters or trappers but as an opportunity to protect a national treasure.

I hope this helps to influence the crucial decision set before you. Please extend further protection for a very vulnerable population of wolves by adopting proposal 142. Thank you for your consideration in this matter.

Sincerely,

Art Schaub
Reference - IN SUPPORT of proposal 142 - To establish a NO HUNTING/TRAPPING BUFFER ADJACENT TO DENALI NATIONAL PARK. The Board has the responsibility and ability to manage the wildlife habitat to meet the goal of a healthy ecosystem which includes all wildlife including the top apex predator i.e) the wolf. The wolves that frequent the Corridor Nenana/ Park Road are some of the most famous longest running scientific studies of wolf families in the US. The continuous interference and decimation of these wolves is not only a loss to the US but also to world. People have travelled to Denali to view these wonderful wolves which now are so scarce that it no longer justifies eco tourism. There are many reasons to maintaining a healthy wolf population and provide the required protection in establish the bugfer zones required. The huge scientific knowledge over so many years that is in jeopardy due to the continuous wolf killings, The ecotourism attraction that brings much money will also be affected. The enjoyment of so many people who take their holidays to places like Denali to see wolves, because of the immense joy of this experience that remains life long. These are things that money cannot buy. The sheer joy and pleasure that nature and wildlife bring to people is in measurable. I ask that you use your authority and compassion to protect these wolves for the whole world to enjoy, scinetists, photographers, tourists etc. These are priceless things that you are lucky enough to have at your doorstep and I think it is incumbent on you to ensure a healthy population is maintained and provided full protection as the wolves move out of the park to follow prey. Please provide the adequate and total establishment of the buffer zone. Regards. Eva Schorer
I support proposal 142 to establish a no hunting/trapping buffer adjacent to Denali National Park. The board has the responsibility to manage wildlife conservation purposes. These wolves that frequent the Corridor/ Nenana/ Park Road are an extremely important scientific resource to some of the most famous and longest running studies of wolf packs in the country. These hunting activities will ultimately result in the loss of entire packs and prematurely end the decades of scientific research. Also, visitors to Denali want to see wolves and spend much of their income on the experience. This will result in losses for Alaskan tourism and present an unproven look on Alaska's tourism industry. As documented by the National Parks Service in 2015 today only 4% of visitors will see a wolf alongside Park Road and before the buffer was scrapped in 2010 nearly 50% saw a wolf. Please consider these and many additional points to establish a no hunting and trapping buffer adjacent to Denali National Park.

Regards,

Jim Schorer
My husband and I had the pleasure of taking a long awaited trip to Denali and stayed at the North Face Lodge. We will never forget our experience and tell many people to also go and visit. The wildlife is a vital part of making this experience memorable.

Seeing Wolves was one of our best memories. Please protect their habitat and make it possible for my grandchildren to see this precious wilderness with wolves. Cynthia Scott
Please approve proposal 142. The impact of a handful of trappers and hunters along the NE border of Denali Park is unjustifiable.
Dear Board of Game,

I am a former Alaska resident, having lived for 23 years in Fairbanks and Anchorage. Going back to my earliest days in Alaska in 1974, I have visited Denali National Park and Preserve many times, often with my family and often with out of state guests. Although there may be other parts of the state with higher wildlife populations, Denali is the premier destination where large numbers of people can see a wide variety of native wildlife, including many large mammals. Historically, there was at least a reasonable possibility of seeing wolves. The Denali experience—including wolves and other large mammals—is simply priceless and far exceeds in value that of any wolves taken by sport hunters or trappers. For average folks, Denali is one of the great places on the planet, and maintaining that experience is in the best interests of Alaska’s economy.

Hence, I encourage your support for of measure 142 to establish a no-wolf-take zone in a small portion of GMU 20, subunits 20A and 20C, adjacent to Denali National Park. The proposed boundaries coincide approximately with the Denali National Park wolf population area, as delineated by telemetry locations.

This is a great opportunity to set aside state-federal conflicts over wildlife management and take simple action to help maintain one of the great, accessible wildlife spectacles in the world. Thank you for your consideration.
Please reconsider the protection of the wolves of Denali and deny the hunting and trapping of these fiercely wild animals outside of the park. We pay good money to have a slim chance of seeing the wolves in the wild. You will find that by protecting them in the areas outside the park, you will make more money from tourism than from the licences for trapping and killing. Alaska is the supreme place of wilderness and wilderness and needs your protection. Shouldn't there be a sanctuary for these superior animals to call their own? I would like my grandchildren to be able to see wild animals outside of a zoo. Please preserve your wonderful heritage and stop this procedure to allow hunting and trapping.
February 3, 2017

Alaska Board of Game,

I recommend that the Alaska Board of Game adopt Proposal 142 for the reasons stated in the proposal and those reasons highlighted below:

The Board should consider the significant decrease in wolf population in Denali National Park from a reported total of 97 in spring 2002, decreased to 49 in spring 2015. A 50% decrease in only 13 years.

The Board should realize that this proposal is one of the easier fixes to maintain a localized wolf population in Alaska, because it utilizes the existing protections in large area of Denali National Park and Preserve and therefore only needs to add restrictions in a relatively small buffer zone on lands in GMU 20 to accomplish the needed preservation of the Park wolf population. This will be easier than protecting other Alaskan wolf populations that don't have the initial protections of a large national park.

As an employee driving bus and guiding in the park from 1977 to 1992, and as an owner of a residence in Healy and inholdings in Kantishna within Denali National Park and Preserve, I have been observing wolves in the Park since 1977. I can state that wolf sittings were rare in 1970s and 1980s (reported as 5%), but increased significantly in 1990s and 2000s as the wolf populations near the Park Road increased. However regrettfully my personal sittings and the recorded sittings have significantly decreased in 2010s since the population has decreased due to pressure from hunting and trapping outside the Park boundary on lands in GMU 20.

I have also personally witnessed wolves that have traveled over 10 miles from denning sites each night to hunt in the summer, and single wolves that have traveled over 60 miles from denning sites to hunt alone all summer before returning to meet back with the pack for the fall. The Proposal 142 also cites wolf studies that document wolves traveling similar distances outside the Park to the north and east into lands in GMU 20 to hunt in the winter. These observations and reports support the fact that these wolf populations will travel significant distances from their Park denning sites to hunt and therefore need the extra protections in the proposed buffer zones to maintain these Park wolf populations.

I therefore strongly recommend that Alaska Board of Game adopt Proposal 142 as an effective and necessary measure to protect the current and future wolf populations in Denali National Park that are a significant tourist attraction and help support the local and state economy.

Respectfully submitted,

Paul Shearer
Support Proposal 142

I ask the Alaska Board of Game’s members to support Proposal 142, which would (re)establish a no-hunting/no-trapping buffer on state lands adjacent to Denali National Park in the Stampede Corridor and Nenana Canyon areas.

As members of the BOG are well aware, in 2010 the Board of Game placed a six-year moratorium on any Denali wolf-buffer proposals. With that moratorium now ended, it’s time to reinstate a buffer. (Many of us Alaskans who support the buffer would argue it’s long overdue.)

Again as you know, in winter and spring some wolves that primarily reside within Denali leave the protection of the park and travel through adjacent state lands in pursuit of prey. While on that state land they are (legally) targeted by hunters and trappers. Since the buffer was removed in 2010, several wolves have been killed in the areas named above, including some animals critical to the success of packs (“alpha” and breeding wolves, both male and female) that primarily reside within the national park. Though a number of factors contribute to the ups and downs of wolf numbers in Denali National Park (as elsewhere), there’s little doubt that hunting and trapping on state lands adjacent to the national park have contributed to the recent declines of Denali’s wolves, and also the disruption of packs that had been among the park’s most visible. Whatever your personal beliefs about wolves (and the federal government), you must realize that many people—including substantial numbers of Alaskans—place great value on the wolves that inhabit Denali and would much prefer to have them alive than dead. For many years since the late 1980s, Denali has been among the best places for people to watch wild wolves. But that’s no longer true, in large part because of key wolves killed on state lands adjacent to the park.

The Alaska BOG and Department of Fish and Game often like to say that wildlife conservation is the board’s primary concern and objective. This is a place where the BOG can help to conserve wildlife—specifically wolves—that have great value to many people as wild, living beings. The proposed buffer area is one of the very few places managed by the state—McNeil River being another—where the protection of individual animals can make a huge difference and where the BOG can make a decision that benefits wildlife watchers and others—many of them Alaskans—who place great value on the ability to share wild landscapes with living animals, not to kill them. Thanks for considering my comments,

Bill Sherwonit, Anchorage
Submitted By
Roz Shirack
Submitted On
2/1/2017 12:13:45 PM
Affiliation
individual
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5033998615
Email
rozshirack7@gmail.com
Address
1645 Church St. SE
Salem, Oregon 97302

When visiting Denali National Park last June I learned of the large decline in the Alaska wolf population, including packs in and near Denali National Park. I am asking you to ban hunting of wolves on state land near the Park boundaries. It is a shame that wolves that wander out of Park boundaries can be killed, especially when hunters specifically bait and draw the wolves out of the National Park, according to a recent program on PBS.

I love Alaska and visit to experience and learn about its wildlife, plant life, and geology. I would think that live wolves provide more value and benefit to the State, in terms of tourism dollars and other wildlife values, than does hunting.

I have seen and heard wolves in Yellowstone NP, but alas, that was not possible during a week spent in the interior of Denali NP.

Thank you for exercising your responsibility to protect Alaska's wildlife by banning wolf hunting on state lands.
Submitted By
Martha Siebe
Submitted On
2/2/2017 9:42:13 PM
Affiliation

Phone
907-346-3329
Email
pixie@alaska.net
Address
8700 Solar Drive
Anchorage, Alaska 99507

I SUPPORT PROPOSAL 142 TO ESTABLISH A NO HUNTING/TRAPPING BUFFER ADJACENT TO DENALI NATIONAL PARK! This includes the Stampede Corridor and Nenana Canyon areas. The wolves of this area are a special population in that they are the most likely to be seen by Denali National Park visitors. They have also been studied extensively. The value of these wolves to Alaska Tourism exceeds the value of a wolf pelt many thousands of times over. I understand that the chance of one wolf being seen in 2015 was 4% or less. I regularly follow the website YellowstoneReports.com. There have only been a handful of days this year when wolves (sometimes several packs) have not be available for Yellowstone Park visitors to view. If Alaska wants to boost the visitor dollars coming to the state, having more wolves to view in Denali is one way to do it.

Please protect this small area so that wolf packs can live and interact in a natural way within their ecosystem, and be observed by visitors who have never seen a wolf before, and studied by scientists who can learn the natural cycle of wolf packs. There are way more Alaskan observers, photographers, and non-consumptive users who will benefit from protecting this area, than local consumptive users. Just looking at the map, it is obvious that this area should be included in the no hunting/trapping regulations just as they are in the surrounding National Park.

Thank you for taking a larger/longer look at this issue.
Please support proposal 142, establish a buffer zone for Denai wolves. It is very unfortunate that the right to view wolves has been diminished for Alaskans and visitors alike, due to the policies of the BOG. Wolves need a no trapping buffer, in order to allow the maximum amount of citizens to view these creatures. It makes economical sense.
I am writing in support of the proposal to halt the hunting of wolves on state lands that border Denali. Let's allow the wolf population to rebound....no one is hunting these wolves for subsistence, they are hunting the wolves for sport. I support allowing the wolf population to return to a healthy population number.
Dear Members of the Board of Game... Please stop killing wolves... I live on the Kenai River and at one time was able to see wolves in the wild. No longer... I've been to Denali National Park and have spent 48 days in the park over the last 5 years. Haven't seen a wolf. What is find most repulsive is that 85% of Alaskans do not want to see wolves exterminated just so big game hunters can kill more moose and caribou. You even authorize killing wolves in their dens. How proud are you to kill these pups before they stop feeding on their mom's milk. Look, I was a professional fishing guide for 12 years on the Kenai River and I've been the biggest cheer leader for the State of Alaska during my 35 years of living and practicing law here on the Kenai but the one black eye Alaska has is the way the Board of Game treats wolves and lately bears. Please stop killing wolves especially those that migrate in and out of Denali National Park. Please allow my guests and kids to still see a wolf when they come up to Alaska and see our beautiful land.

Sincerely,

Attorney At Law

Joseph Raymond Skrha
Support Proposal 142

I'm writing to voice my support of proposal 142 for the following reasons:

- Wolves don't know the Denali park border and need a buffer zone to safely exist when they pursue prey.
- Without this buffer, the # of wolves trapped and killed increases. This reduces the chances that the public and tourists' have of spotting a wolf in the park, which is often their primary reason for visiting it or nearby Park Road.
- Hurting the survival of wolves will reduce tourism to the Park and state as well as reverse the dollars and hard work spent to foster an environment for wolves. The wolves that most often visit the Corridor/Nenana/Park Road area are an important scientific resource. Hunting activities will end these wolves' lives and unnaturally end one of the longest-running scientific studies of wolf packs in the country. Similarly, the majority of Alaskans support creation of a buffer to protect wolves in this small but critically important area.
To the Alaska Board of Game

Re: Proposal 142

I am writing to support Proposal 142 providing no-take areas adjacent to Denali National Park and Preserve. Hopefully, this will eventually increase the wolf population in the park. My husband and I spent 4 days and 4 nights in Denali in late July 2016 at the North Face Lodge. We hiked in the park every day. We saw every animal we hoped to see—except one—the wolf. I did find recent wolf scat on one hike (as confirmed by our naturalist guide) but no other evidence of these wonderful animals.

Thank you for your consideration.

Nancy K. Socha
I would like to submit my support for Proposal 142 - the establishment of a no-hunting/trapping zone on the northeast boundary of Denali National Park & Preserve. I have been working in Denali as a tour guide since 1982 and can attest to the appreciation that visitors and locals alike derive from being able to see wolves in their natural habitat. An intact ecosystem is also vital to scientific research. Wolf numbers have declined dramatically since the previous safe zone was rescinded and Bridget Borg’s research indicates there is a direct correlation between the two. Please remember the desires hundreds of thousands of people who come to visit this special place to see wildlife alive as opposed to the few who prefer killing and diminishing this precious resource.

Don Soileau
On my last stay at Camp Denali and North Face Lodge, I have the first time experience of watching a lone wolf running in a large river bed. I watch it from one side to the end until it when out of vision. It was such a powerful sight, and stays with me to this day. Please don't allow hunter or other people to have the opportunity to further reduce our wild wolf population. In other areas of the US, they are beginning to understand the value to humankind of our wildlife and are protect them better, don't go in the opposite direction in Alaska, our one last wilderness frontier.

Thank you for your consideration.

Ron
To Whom It May Concern at the AK Board of Game;

I visited Denali NP last year for the first time. I was really hoping to see a wolf - even if only from a distance - or the sound of howling at night would have been wonderful too. We stayed for a week, from Monday through Friday before moving on our next spot.

Much to my surprise when I got there - I had been told that the wolf population in the park had been cut by approx 2/3 from the previous year (from ~150 to ~50) because a buffer zone around the park had been removed and the wolves were shot or trapped that crossed the lines.

Very disappointing. Needless to say I saw and heard nothing.....and the guides we were gave us close to 0% odds in seeing them. Almost impossible for me to share glowing reviews of my trip on tripadvisor, or any other social media, because of the disappointment in AK in not protecting such a wonderful resource. Upsetting natures balance in Denali to satisfy a few hunters/trappers seems to me to be a study in making a few locals happy and discouraging a world full of tourists from visiting AK to see and experience what they cannot see at home.

AK is a huge state - leave a buffer around the park and let the local wolves thrive as best they can in the little space they are allocated proportionately .....hunters/guides can set up in the yukon or somewhere else for their trophy wolf. Isn't it the responsibility of the AK Board of Game and your authority alone to conserve the wilderness and wildlife in this region? What are you thinking?

Regards,

- Ben Spalding

2901 Meadowbrook Circle South
Allentown, PA 18103-5425

610-703-3652  spalding@cissltld.com
Hi,

Having visited Denali National Park several times with my family, I would like to voice my support for increased protection of wolves through the measures identified in Proposal 142.

To this day, we remember seeing a wolf eating a rabbit on our first trip to the park. They are a critical element of the animal population.

Thank you,

Rob St Andre
Submitted By
Sondra Stanway
Submitted On
2/3/2017 12:11:24 PM
Affiliation
Phone
907 364 2536
Email
spstanway@yahoo.com
Address
2935 Simpson Ave
Juneau, Alaska 99801

To Members of the Board of Game:

I am writing in support of a Denali Wildlife Conservation area on the NE boundary of the park to protect Alaska’s wildlife. Here are my reasons:

1. Animals should not be hunted or trapped near the park. One of the most important goals tourists have on visits to Alaska is for wildlife viewing opportunities.

2. The economic benefits of tourism to the state are high and should be considered.

3. To restore and enhance the valuable wildlife viewing resource of Denali, a durable solution is needed. A Wildlife Conservation area will help with these goals.

Thank you,

Sondra Stanway
Juneau, Alaska
Please set aside a buffer zone to protect wolves access to hunting areas. They deserve your attention. My husband and I have visited Denali 4 times to view wolves. We have met many tourists who were there for the same reason. Of course, we would not travel that far if the wolves were being killed for human recreation. Wolves are synonym with freedom and wildness. Including a buffer zone next to Denali would ensure their safety. Thank you
I am a lifelong Alaskan who has been living in the Denali area for 8 years. I would like to see the state lands around Denali National Park, as outlined in Proposal 142, protected from hunting and trapping.

I believe these wolves hold particular international importance for tourism and unparalleled scientific study and their loss would reflect shamefully on the state of Alaska. I believe visitors to Denali who get a chance to see a wolf are changed beings and should not have to give up this chance to just a few individuals who wish to partake in hunting and trapping activities in these particular areas. Additionally, I believe it is the absolute responsibility and authority of the Alaska Board of Game to provide conservation on state lands in this region.

Thank you for your time and I hope you consider passing proposal 142 to protect the Denali area wolves.
When I visited Denali National park for the second time w few years ago, our group was lucky enough to see a white wolf, identified to us as the female head of a Park pack, trotting along a river and then crossing it on the bridge we were waiting to cross. It was thrilling, and probably the most memorable thing we saw, among so many wonders. We heard later that "our" wolf was killed just outside the park in an area that allowed hunting. There are so few wolves. Is there any good reason they should be allowed to be hunted? Please provide what additional protection you can for them. Then I'll come back to see how they are doing! Thank you so much for your consideration. Elizabeth Sterns
Please consider the following:

- There is a precedent for a no hunting/trapping area in the Stampede Corridor/Nenana Canyon. In 2001-02 the Board acknowledged that the park wolves were a valuable resource for visitors, and set aside areas closed to hunting. The park's wolf population (Spring 2002) was 97 wolves, far more than inhabit the park now.

- The Board has both the authority and the responsibility to manage wildlife for conservation purposes. A majority of Alaskans support creation of a buffer to protect wolves in this small but critically important area.

- The wolves that frequent the Corridor/Nenana/Park Road area are an important scientific resource. They are the subjects of some of the most-famous, longest-running scientific studies of wolf packs in the country. Hunting activities which ultimately result in the loss of entire packs abruptly and prematurely end decades of research.

- Visitors to Denali want to see wolves, and they spend a lot of money for the opportunity. No wolves - or news that the state routinely allows wolves to be killed adjacent to the park for lack of a very limited buffer area - are black eyes for Alaska tourism. The millions of dollars tourism brings to the Denali area and the entire state are now, more than ever, crucial to our economy.

- A mere 4 percent chance that a visitor will spot a wolf along the Park Road (as documented by the National Park Service in 2015) is an abysmally low number. Before the buffer was scrapped in 2010, nearly 50 percent saw a wolf.
To whom it may concern:

I write to express my strong support for Proposal 142, which would reestablish the no-wolf-take buffers adjacent to Denali National Park in the Stampede Road area and east of the Park north and south of the Park Entrance.

I live in Talkeetna, and I have visited Denali National Park many times over the last 45 years, starting in the mid 1970’s when driving into the Park in private vehicles was allowed without a permit in September, all the way to Wonder Lake. I have taken friends and relatives visiting from the lower 48.

Afterward, they usually can’t stop talking about it. The scenic vistas are impressive, but it is the opportunity to see wolves and bears and many other animals in the wild that makes a lasting impression and an experience most will never forget.

In 2010, the protective buffers for the wolves were removed. I have a great interest in, and derive much enjoyment from, observing and photographing wildlife. I am not seeing wolves now like in the past. The last two visits, I saw no wolves. There certainly is a correlation between the removal of the no-take buffers and the decline in wolf sightings in the Park. Correlation does not necessarily reflect causation, but research has shown that hunting and trapping outside the Park have a marked effect on the population of wolves within the Park.

Denali National Park attracts hundreds of thousands of visitors each year from Alaska, Lower 48, and from all over the world. The vast majority of these people come to see the wildlife, and of course, an opportunity to see a wolf, even one wolf, is an exciting, memorable experience.

It is incredible to me that the BOG saw fit to remove the protective buffers in the first place, and even more misguided to not have reinstated them long before this. I just don’t see the justification of diminishing the Denali Park visitor experience for so many, in favor of the handful of hunters or trappers.

I urge you to adopt Proposal 142.

Thank you for your consideration.
I am writing to urge you to support Proposal 142.

I visited Denali National Park, staying at Camp Denali, 4 years ago with my husband and 2 young boys. Bar none, it was the most enjoyable and inspiring vacation we have ever taken, and we are world travelers, having travelled throughout Europe, South Africa, and Central America with our kids.

What made Denali so special is its absolute unspoiled and vast nature, including the wildlife within it. Looking in any direction 300 miles across the Alaskan plane—if that is not good for the soul I don’t know what is. We watched a bear and a wolf sparr over a moose carcass, we watched eagles soar overhead...These are the experiences that made it real. Since then I have sent many friends to visit Alaska as tourists based on my glowing reviews of the experience. We spent nearly 15K on our trip to Alaska and felt that it was well spent tourist dollars. I urge you not to underestimate not only the tourist impact of preserving wild spaces and wildlife, but also the fact that this is a resource that has the potential to NEVER "run out," unlike oil and gas reserves.

I know it is difficult for those in government to look past short term agendas, goals and political gains. But I urge you to make no mistake about what your greatest resource is in your great state—not oil, not gas, but the unspoiled and unique nature of the wild areas of your state.

Thank you,

Betty Suh-Burgmann
While I am sure you wonder how a science teacher from Chicago cares enough to send a note, I do think the note and my thoughts are worth considering. I am made aware of the wolves hunting regulations via a friend who is now an Alaska resident. He is passionate about Alaska. He loves the land, the animals, the snow, the photography and the people. He brought this to his whole network, not to say hunting is wrong, but to say hunting wolves for sport, instead of the feed a family, and hunting wolves in such a way that the population sizes are not healthy needs to be addressed. you cannot maintain any healthy population without appropriate predator numbers, so please be very mindful of the populations in Denali when you regulate the season.
I fully support proposal 142. I have been a long time supporter of restoring buffer zones around Yellowstone National Park to protect wolf numbers during hunting season, and absolutely support this move around Denali. Wolves must have a rightful place in the ecosystem, and they are a huge driving force for ecotourism. An ecosystem is kept in balance by the presence of the apex predators, and we must do all that we can to look at the big picture. Fragmenting a wolf pack by killing any of its members is a cruel act and we must base management on science based information. Thank you for doing the right and humane thing!

Douglass Swanson
Proposal 142. Support

I support Proposal 142. If adopted, it would establish a controlled use area on the north and east sides of the old Denali National Park boundaries. As drafted, Proposal 142 would prohibit the taking of wolves in the controlled use area.

I support amendment of Proposal 142, so that not only would the taking of wolves be prohibited, but, within the controlled use area, there would also be prohibited the baiting of bears, and the taking of lynx, wolverine, river otters, fox, and marten.

I was a member of a BOG subcommittee which was directed to attempt to reach consensus on this issue. That was in 2000-2001, as best I recall. I mention this to make the point that it has been 17 years now that I have closely followed this issue.

I won’t discuss in this letter the decline in sightings of wolves along the Park road, or the decline in the population of wolves in the Park. But I do want to talk about the impact this issue has had on me. Some of you know me, and know that I have been a moderate, informed advocate for conservation and non-consumptive uses.

Let me summarize the impact of this issue on me:

For 17 years, the taking of wolves right along the north boundary of the Park, about 6-10 miles from the Park road, has been the #1 issue that has demonstrated to me that Alaska’s wildlife management is fundamentally flawed; and that the decision-makers, both on the BOG and within the Department, are biased.

For 17 years, I have listened to, read, and considered most of the arguments given as to why 1-3 trappers and hunters should rob hundreds of thousands of people of the opportunity to view wolves. Those arguments are mere excuses. No person can honestly say that the value of trapping and hunting wolves by 1 - 3 people outweighs the value of viewing opportunity for 100,000 - 200,000 people riding Park buses, and otherwise visiting the Park.

I have concluded that Department’s data is unreliable; that it has been organized for advocacy purposes; and the purpose is not to inform. My view is that the BOG and the Department have grievously injured themselves. This issue is Exhibit #1; the “Poster Child” for bias.

I still think that reform of the BOG process and of the Department is possible. But the outright bias needs to stop. There are many thousands of Alaskans who don’t hunt and trap, and who treasure wildlife viewing. I urge you to adopt this proposal, and demonstrate by action that all Alaskans, and our visitors, are valued.

Very truly yours,
Kneeland Taylor
RE: Denali wolves.

It is absurd to me that a population of animals that are so important to the multitude of visitors to the State are not already protected from the exploitation by a few individuals. These animals have no concept of an arbitrary boundary. Trappers can move at will to another area. This nonsense has been going on way too long!
Dear members of the board,

we are very happy having visited Denali National Park and the North Face Lodge in the past. It was a wonderful experience to see the unique harmony between wildlife habitat and a soft tourism that we have not experienced anywhere else. It is still one of our major wishes to repeat this extraordinary tour one day.

During our visit we had the lucky chance to view a grizzly with cubs, doll sheep, caribous, a moose, beavers, a red fox, all the birds and... wolves!

We are disturbed that the population of the wolves is declining in this unique refuge allowing people like us to have the opportunity to observe all these animals in real wildlife.

Therefore we fully support the increased protection of wolves through the measures identified in Proposal 142.

We entreat you insistently to vote for a stable wolf population in Denali National Park.

Sincerely,

Heidi + Manfred Thiesen
Dear Board of Game,

I am writing, as an Alaskan who has lived and worked in the Denali area for 15 years, to voice my comments in support of a wolf buffer zone in the woftownsheips area. I recall when wolves were often seen by visitors in Denali National Park, such as the summer of 2006, but in the past three years I have only seen one wolf each year. Wolves are vulnerable to hunting and trapping, and the boundaries between lands open to trapping and hunting and protected National Park lands are unknown to them. They follow the caribou or moose, which often travel into the former buffer zone.

In addition, I mush dogteams in winter, often in the Stampede area. In the past several years since the buffer was opened to trapping, I have had to avoid the area with the dogs for long stretches of time, and even now will not take young dogs in the area, and absolutly cannot allow a dog to run loose, due to the prevalece of traps, which have even been set right on the main trail. These actions foster no kindness for multiple use of the area between traditional Alaskan activities.

Please, consider re-instating the buffer zone. Listen to Alaskans. Listen to the Grandmothers from Ohio who long to see a wolf in the wild. Don't let the interests of one or two individuals win over the collect beterment of the locals, visitors, larger economy, and wilderness of Alaska.

Jan Tomsen
Denali, Alaska

BS Wildlife Biology, UAF
Dear Board of Game,

I'm writing to ask you to support Proposal 142 at the upcoming meeting in February.

I have lived and worked in and around Denali National Park seasonally since 2003 and year-round since 2008, mainly in the tourism industry which drives our seasonal economy.

Through talking with visitors, it seems people come from all over the world to this area for two primary reasons - see Denali (the mountain) and see wildlife in its natural habitat. Wolves are a big draw, and I have often heard they are the highlight of many visitors trip when they are lucky enough to see them while out on the Park Road.

It is well documented that the wolves seen from the Denali Park Road travel outside the park boundaries into the Stampede area, especially during the winter and breeding season. By closing this small area to trapping, it would inconvenience a few trappers but the benefits would be to the 100's of thousands of visitors to the National Park each year. Again, this buffer was in place from 2000 - 2010 and the trappers still found a way to make a living and the 2016 Bridget Borg study showed it had a positive impact on wolf viewability.

Thank you for your consideration.
Submitted By
Kathleen Toubman
Submitted On
2/2/2017 3:48:25 PM
Affiliation
Phone
207 441-4058
Email
katoubman@msn.com
Address
P.O. Box 262
Rockland, Maine 04841

To Alaskan Board of Game,

I am asking The Board to support Proposal 142 and prohibit the taking of wolves on lands bounded by Denali Park. I have visited Denali Park and other regions of your beautiful state many times (7 visits). Denali is a special place and the wolves are an amazing resource, which is diminishing. Supporting the Denali wolves also supports a healthy ecosystem and the Alaskan tourist visitor market. Thank you for your consideration,

Kathleen Toubman, Rockland Maine
To the Alaska Board of Game:

I am writing to support Proposal 142.

After my first spectacular trip to Alaska in 1996, I convinced others to travel with me to Alaska. My family and I have travelled to Alaska several times in order to see and explore Alaska’s treasured wilderness, including its wild animals. We have hiked, fished, canoed, and enjoyed guided tours. I have stayed inside Denali National Park twice and travelled to many other parts of the state. During our various trips, our family group has totaled over 100 visitor days in Alaska. During one stay inside Denali NP, we saw lots of wildlife with the most memorable being the sighting of a wolf running through the brush as we rode the bus taking us back to town.

The Denali wolves are highly vulnerable to being hunted or trapped when they cross the park boundary. The boundaries are meaningless to them as they try to eke out their existence in a world which threatens their very existence. The proposed buffer zone will certainly lessen one of the known human-caused factors in their population decline.

The Denali wolves are important to international tourism and to science. The state of Alaska gets far more tourism dollars from a robust wolf population as part of an intact and diverse wild animal population than it could possibly get from hunting licenses.

It is your responsibility to conserve the wilderness and wildlife of Alaska. I urge you to use your authority to do so by approving Proposal 142.

Sincerely,

Bruce L. Tow
I am writing to support Proposal 142.

My family has travelled to Alaska several times in order to see and explore Alaska’s spectacular wilderness, including its wild animals. We have hiked, fished, canoed, and enjoyed guided tours. We have stayed inside Denali National Park and elsewhere in the state. During our various trips, our family group has totaled over 100 visitor days in Alaska. During one stay inside Denali NP, we saw lots of wildlife with the most memorable being the sighting of a wolf running through the brush as we rode the bus taking us back to town. It created a lasting memory capping that fantastic trip.

The Denali wolves are highly vulnerable to being hunted or trapped when they cross the park boundary. The boundaries are meaningless to them as they try to eke out their existence in a world which threatens their very existence. The proposed buffer zone will certainly lessen one of the known human-caused factors in their population decline.

The Denali wolves are important to international tourism and to science. The state of Alaska gets far more tourism dollars from a robust wolf population as part of an intact and diverse wild animal population than it could possibly get from hunting licenses.

It is your responsibility to conserve the wilderness and wildlife of Alaska. I urge you to use your authority to do so by approving Proposal 142.

Sincerely,

Lois M. Tow
Submitted By
Eric Townsend
Submitted On
2/1/2017 9:58:06 AM
Affiliation
Phone
9787013904
Email
mrmadchemist@gmail.com
Address
6 Parker Street
Rochdale, Massachusetts 01542

Hello,

I would like to voice my support for proposal 142 pertaining to the wolf population in Denali. My wife and I spent our honeymoon at the foothills of the great one and saw an enormous amount of wildlife however we did not see any wolves. Protection for this weakening population is important to conserve their presence for future lovers of the outdoors. I one day hope to bring my children to Denali and would love to cross a wolf sighting off my list!

Thank you, Eric
Dear Board of Game:

Please pass proposal 142 and re-instate the no hunting/no trapping buffer zone in Denali National Park.

It is well past the time for measures taken to preserve the wolf population in this area for research and wildlife observing purposes.

I know you will do the right thing.

Thank you.

Susan Valenti
Regarding PROPOSAL 142: I strongly SUPPORT this proposal and urge the Board to adopt it.

After the Board of Game rescinded the buffers (in 2010) that offered critical protection for Denali National Park wolves that ventured outside the park during winter, wolves were trapped and shot in these areas. This resulted in greatly reduced wolf viewing opportunities for park visitors. Denali is one of the few areas in North America where people can potentially see or hear wild wolves. I support the concept that preserving this opportunity is important to Alaska. The best way to accomplish this is to adopt Proposal 142 and thereby reduce the risk that wolves in the park will be killed.

The background information and data presented in Proposal 142 is accurate, thorough and complete and I need not reiterate it here. I think it presents a compelling case explaining why this proposal should be adopted.

Please carefully consider the numerous comments from those who support this proposal. I hope you will agree that now is the time to ensure that the park’s wolves are adequately protected so that we can once again offer park visitors a reasonable opportunity to interact with this iconic Alaskan animal.
SUPPORT PROPOSAL 142

To the Board of Game:

The Board has both the authority and the responsibility to manage wildlife for conservation purposes. A majority of Alaskans support creation of a buffer to protect wolves in this small but critically important area.

The wolves that frequent the Corridor/Nenana/Park Road area are an important scientific resource. They are the subjects of some of the most-famous, longest-running scientific studies of wolf packs in the country. Hunting activities which ultimately result in the loss of entire packs abruptly and prematurely end decades of research.

Visitors to Denali want to see wolves, and they spend a lot of money for the opportunity. No wolves - or news that the state routinely allows wolves to be killed adjacent to the park for lack of a very limited buffer area - are black eyes for Alaska tourism. The millions of dollars tourism brings to the Denali area and the entire state are now, more than ever, crucial to our economy.

A mere 4 percent chance that a visitor will spot a wolf along the Park Road (as documented by the National Park Service in 2015) is an abysmally low number. Before the buffer was scrapped in 2010, nearly 50 percent saw a wolf.
Submitted By
Rebecca Vitale Mandich
Submitted On
2/3/2017 4:19:06 PM
Affiliation
Phone
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Email
rvmandich@yahoo.com
Address
1527 Waverley St.
Palo Alto, California 94301

Please Protect the Denali wolves they have been hunted terribly and without regard for their families or numbers .. I'm very concerned you are disregarding their welfare

I've been wanting to visit Alaska forever and I will next year .. one of your great tourist attractions is your wildlife please do all you can to protect and allow it to thrive for the people who do not wish to kill it .. but to leave them as we found them... alive!

Thank you
Submitted By
Susan Vogt
Submitted On
2/2/2017 3:57:16 AM
Affiliation

Phone
9073888671
Email
bias@alaska.net
Address
269 Bias Dr. #B
Fairbanks, Alaska 99712

I support proposal 142!

Reinstate the buffer! I am an Alaskan that does not hunt or trap but spend alot of money on wildlife viewing around the state. I am tired of the BOG ignoring, dismissing, ridiculing Alaskans who don't agree with your kill everything policy. We far outnumber hunters and trappers in this state and we should be carry the appropriate weight when it comes to decisions. The history of this board proves the opposite!

REINSTATE THE BUFFER FOR WOLVES!!!!!!!!!!!!!
Support Proposal 142

I support proposal 142 that establishes a no trapping/hunting zone next to Denali National Park. Wolves often leave the park during winter and spring to enter the Stampede Corridor to cross the Parks Highway-Nenana River Canyon area to chase prey for food. This makes the wolves a target for now allowed hunting and trapping. In 2001-2002 the BOG established a protected zone for wolves because they were so popular with tourists who came to view them. Tourism, just to see the wolves, is a very significant economic source for the state. Also, these wolves have been scientifically observed and researched continuously and should remain thriving for ongoing future study. The many tourists who will visit this area will admire your visionary actions to look out for the wolve. Thank you.
February 3, 2017

Slightly revised comments from previous comments already submitted on Feb 1, 2017. Revised portion asks the BOG to reject NPS Proposal 141.

Alaska Board of Game

Proposal 142 Authored by both the Denali Citizens Council and the Alaska Wildlife Alliance

I am writing you to urge you to support Proposal 142 that creates a protected buffer zone for Denali’s wolves that prohibits both the hunting and trapping of wolves within the Wolf Townships and adjacent areas to the east of Denali National Park.

I have been working in the tourism industry within Denali for the past 30 years, taking up to 52 visitors into the park on a daily basis. I can attest to their excitement upon seeing wolves especially from 2003-2011 when Grant Creek was denning within a quarter mile of the park road.

I can also attest to their disappointment, anger, and lack of understanding when they learn that their viewing experience to Denali has been subverted by the actions of the both the BOG and trappers and hunters who target and kill Denali wolves who enter the Wolf Townships and areas east of the park.

The actions of the BOG in removing the previous protective buffer zone in the Wolf Townships in 2010 has directly lead to the deaths of high ranking members of both Grant Creek and East Fork and other family groups with the resulting consequential decline in visitor viewing from a high of 44% in 2010 to 4-6% over the past four years.

This has lead to cascading disruptions within these family groups that have caused den site shifting, changes in territorial use, changes in hunting habits and changes in their use of the park road corridor and has contributed to a reduction of wolves within the Denali eco-system born out by spring count (baseline) census over the past four years within Denali ranging from 52 wolves in 2013 to 49 wolves in 2016. See [https://www.nps.gov/dena/learn/nature/upload/Denali-wolf-population-508-compliant.pdf](https://www.nps.gov/dena/learn/nature/upload/Denali-wolf-population-508-compliant.pdf)

The 2016 spring census was taken prior to the hunter caused death of the East Fork alpha male and the possible death or dispersal of the last member of East Fork: the pregnant alpha female bringing the park wolf population down to 47 wolves.

Historically and currently, both NPS and the State have only considered the overall wolf population and not the individuals and family groups that make up these populations. High ranking individuals are critical to family cohesiveness, pass down necessary hunting, denning, territorial, pup rearing and travel information to younger wolves and are the primary decision makers within these family groups.

Both Drs. Tom Meier and Gordon Haber (both deceased) agreed that it was these high ranking wolves that were more susceptible to trapping/hunting caused losses in the Wolf Townships as opposed to other areas where younger, less experienced wolves are generally more vulnerable.

Due to this vulnerability to high ranking wolves, when they are killed it creates maximum disruption within these family groups within Denali.

Furthermore, current NPS biologist Bridget Borg has concluded that in 25% of the cases where one or the other or both breeding wolves (alpha males/females) are killed it leads to the disintegration of the entire family group.

I would like to add that when family groups do stay together after losing both the alpha male and female (example: East Fork in the February/spring of 2005) that disruptions occur that can continue for years which impact the visitor viewing of Denali’s wolves. This is another fact that NPS and the State refuses to acknowledge and take into consideration for wolf management within Denali National Park and adjacent areas to the park.
When these two wolves were killed, it fundamentally changed the dynamics (see above disruptions) within this family group taking them away from the park road corridor which dramatically reduced visitor viewing of Denali’s longest lived and primary family group——for years. In fact, visitor viewing of this specific family group never recovered after 2005 prior to these deaths and believed disintegration of this family group in the summer of 2016.

This is not the only example as the Headquarters group which was finally trapped out east of the park in 1995 (their territory included the paved section of the park road) resulted in significant declines in visitor viewing along the pavement section for years. Other examples where trapping/hunting caused deaths disruption/disintegration to eastern family groups would be Mt. Margaret, Sanctuary, and other family groups.

As long as Denali’s wolves have to survive the gauntlet of traps, snares and hunters within the Wolf Townships and adjacent to the park, I believe based on the evidence that family group continuity will be disrupted and visitor viewing will remain low and almost non-existent as it currently is.

NPS also has a proposal [https://www.nps.gov/dena/learn/nature/upload/Wolf-Buffer-Proposal-2017.pdf](https://www.nps.gov/dena/learn/nature/upload/Wolf-Buffer-Proposal-2017.pdf) before the BOG which I believe will do nothing to resolve this issue as it is deeply flawed.

Their proposal which only protects wolves in the eastern portion of the Wolf Townships and only for a limited time from February 1st to August 1st from hunting and from February 1st to November 1st from trapping allows for the killing of these critical high ranking and all wolves prior to the breeding season.

In other words, the NPS proposal allows for the killing and disruption of Denali’s wolf family groups prior to the breeding season throwing them into chaos; where they may stay together although, seriously disrupted or they may disintegrate completely.

Furthermore, NPS chronically ignores the critical importance of high ranking (breeding pair) wolves to each specific family group that makes up the park wolf population, especially these eastern family groups that form the foundation of visitor viewing.

Until NPS and the BOG (State) recognize the critical importance of these high ranking wolves to potential family group continuity and the consequent establishment of territory, denning, hunting, pup rearing and travel habits which bring them in close proximity to the park road, and consider this as being essential to wolf conservation within Denali, then there is I believe, a serious and fundamental flaw in their management and a serious void in information that is not being considered.

NPS’s and the State’s present and historical practices which manages for overall numbers seems to imply that individuals and family groups are expendable as long as the population can be re-colonized from outside the park.

This type of management whether by NPS or the State is ludicrous as it ignores the individuals and family groups that actually make up the population. You cannot have a population without individuals and family groups, it is this fact that both NPS and the State need to acknowledge and take into consideration with wolf management within Denali and also on adjacent State lands.

I would encourage the State and NPS to take into equal consideration the holistic and comprehensive approach of managing wolf populations as individuals and family groups that actually make up the overall population. And that these individuals and family groups are not only valuable from a healthy, functioning ecosystem standpoint but from a visitor viewing standpoint as well.

The Alaska Board of Game’s responsibilities are not solely limited to promoting the interests of hunters and trappers but to equally consider the needs of non-consumptive users. In previous years, the BOG through their actions has chosen to sacrifice the viewing and visitor experience of over 500,000 visitors who visit Denali in favor of only a handful of trappers/hunters.

How is it, that a handful of trappers/hunters in the Wolf Townships and areas adjacent to the park is given more consideration and validation than up to 500,000+ Denali visitors, including Alaska residents? How is it that these trappers/hunters are considered more valuable than the millions of dollars that Denali tourists pump into the state’s economy each and every year?

How is it that the Tourism Industry, Alaska’s third largest industry who employs thousands of Alaskan and non-Alaskans alike and who wishes to offer a high quality experience to park visitors, must accept a subverted visitor experience to placate a handful of trappers/hunters within the Wolf Townships and areas adjacent to the park?

How is it that the BOG doesn't recognize the overwhelming economic value of living Denali wolves to hundreds of thousands of visitors each year, versus the minimal and one time economic value of dead wolves to a handful of trappers/hunters?

During a time when the state of Alaska is facing a 3-4 billion dollar budget deficit, when the state is believed to be in recession for the next three years (see [https://www.adn.com/opinions/2017/01/20/economists-say-recession-will-last-three-more-years-followed-by-a-smaller poorer-alaska](https://www.adn.com/opinions/2017/01/20/economists-say-recession-will-last-three-more-years-followed-by-a-smaller-poorer-alaska)) and when it is believed that there will be a net loss of 30,000 Alaskans over the next decade, it would seem only prudent and practical to maximize the economic possibilities of the tourism industry by protecting the Wolf Townships and areas adjacent to Denali National Park for the park wolves.

For the above reasons, I ask the Alaska Board of Game to support the Denali Citizens Council/Alaska Wildlife Alliance Proposal 142

and......reject NPS Proposal 141.
Sincerely
Bill Watkins
PO. Box 147,
Denali Park, Alaska 99755
Watkinsnp@hotmail.com
Hi Folks,

We live in Indiana, but have visited Alaska 35 times since 1981 and hope to return again this summer. We travel all over, but cumulatively, we’ve spent well over a year in just Denali National Park. Why do we keep coming back? Because, we love Alaska. We love the wilderness and wildlife that’s there. We’ve loved viewing the wolves of Denali National Park.

We’ve seen the wolf packs ebb and flow over the years, but we’ve also seen an overall steady decline in their population. I don’t believe the Toklat pack even exists anymore. I hope you folks know how many people from around the world come to Alaska for the wilderness and wildlife.

I know you folks are responsible for the conservation interests on state land and many of you see your primary responsibility to the hunters and fishers of Alaska. However, I ask you to know and realize that what you do also reflects greatly on the conservation of all land and the interests of the entire world. Your have an awesome responsibility. I ask you to look at it broadly, because it effects so much and so many people.

We ask you to please support Proposal 142 at your Region III meeting on February 17-25, 2017. Please do the right thing.

Thank you.

Sincerely,

Bob and Karen Watson
Dear Board of Game,

I'm writing to ask you to support Proposal 142 at the upcoming meeting in February. This proposal offers reasonable, science-based management of the ecosystem surrounding Denali National Park.

I have lived and worked in and around Denali National Park seasonally since 2004 and year-round since 2009, often in some facet of the tourism industry, which drives our economy. For those who visit Denali from the lower 48 or around the world, the opportunity to see a wolf is certainly a draw, and increasingly unique to this area. It is irresponsible and absurd to destroy the very facets of our environment that people pay good money to come here to experience.

But we are all loath to concede to the desires of tourists over our own, so let's focus on science, and food. Denali National Park's wolf population is among the longest-term studied in the world, and from this and other studies, we have learned of the utmost importance predators play in maintaining healthy ecosystems, including prey populations. I'm not a hunter, but I like to eat moose and caribou, and I benefit from the efforts of those who are willing to share with me. They benefit from a hunt that offers an animal big and healthy enough to have some to share. Wolves keep those populations healthy and balanced. It is your job to maintain those populations within the limits of what the ecosystem can actually support longterm.

So, specifically, Proposal 142: This would inconvenience a few trappers who have found ways to profit from the known migration of Denali’s wolves, which has resulted in an unnaturally low wolf population in recent years. The area in question is miniscule in relation to the state lands where hunting and trapping are still allowed, but would have a benefit to the park’s wolf population, and thus our local economy and scientific legacy.

Thank you for your consideration,

Erica Watson
i am a resident of Alaska since 08 in Healy. I had lived in the canyon for 3 yrs of truly pristine beauty in the 70 s. So I'm 71 now. I've only seen one wolf since 08 and oddly enough that was last year when I was cross country skiing in the Denali National Park. Long ago a wonderful silver wolf crossed my path while skiing. I guess we have to ask ourselves what we want for ourselves and our kids and their kids. A good friend who loves Denali hiking is now in Mongolia. National Geographic has shown us the enormous hunting possibilities of the many many many wolves there and the ritual of hunters on horses hunting wolves. But National Geographic also published this one huge wolf with this one fierce looking man who traps wolves in the Stampede area. Please leave some of the wolf families to be. I cannot see why the very few left would be hunting opportunity? This is a major tourist area and almost impossible to get not a few jobs a day like the Eastern Europeans kids do. It's a rich community. So I don't see the sense in hunting a wolf in people's back yards and right next to Denali where these wolf families have been studied.
Support Proposal 142

As an outdoor enthusiast, supporter of wildlands and wildlife, I encourage you to pass this proposal. The main reason for me to visit Denali as a newly retired teacher is to see Denali’s wolves. That is no longer a possibility as the odds of seeing them has been drastically reduced due to hunting and trapping. I will not spend my retirement to travel to Denali if wolves are not protected. Furthermore, so much research has been conducted on Denali’s wolves and that has been lost due to the loss of protected areas for wolves. Please support proposal 142.
Please adopt the provisions of Proposal 142. Wildlife watchers far exceed hunters and trappers, and capitalizing on wildlife tourism promises much greater benefits to the Alaskan economy than killing for fur. The furs obtained largely end up accessorizing the growing Chinese and Russian affluent classes, which hardly seems beneficial to the Alaskan and American citizenry. Further, the arbitrary boundaries over which traveling wolves find themselves in severe peril represent the antithesis of fair chase principles. I value wild places and intact ecosystems. Wolves are an essential component. Please throw those of us who care about wild places and wildlife a bread crumb by adopting the provisions of Proposal 142.
I support the proposal 142, save the wolves in Denali and no trapping in the corridor. I have been in the Denali park several times and have not ever seen a wolf. Please put this back so they are saved. sandy
I strongly support full protection for the wolves and other predators on the borders of Denali. Alaska gets more economic value from tourism than from hunting and trapping; people come from all over the world to view our wildlife. Thousands of people benefit from viewing; only a very few derive any benefit from the killing of these animals. Viewing opportunities have declined dramatically, because of trapping and hunting on the park borders. These predators are also valuable for scientific study. Their value for tourism and for science greatly outweighs their value to a few trappers/hunters.

The BOG really needs to take a more ecological perspective, considering the interactions within the whole ecosystem. It has responsibility for maintaining the biodiversity in this (and other) areas, and should not be serving the demands of a few persons whose killings damage the system at a cost to the rest of us, many of whom take pride in being a citizen of this state where wildlife still could flourish. In short, the BOG should serve all of us, not just a few.
The Wolf Conservation Center Supports Proposal 142

The Wolf Conservation Center is a nonprofit organization that promotes wolf education and conservation, and it is currently supported by more than 3 million people across North America and beyond. In addition to many other educational experiences, we promote educational tourism opportunities throughout the USA and Canada, which enable participants to observe and learn about wolves in their natural habitat. Encouraged by growing interest, we explored trips to Denali National Park for the sole purpose of planning educational wolf watching adventures. Despite difficult economic times, we remain eager to support Alaska’s tourism industry.

It is our understanding that from 2000 until 2010, the State of Alaska prohibited wolf hunting and trapping in two areas bordering the park, the Stampede and Nenana Canyon Closed Areas, in order to protect two of the park’s three most-commonly viewed wolf packs. At the spring 2010 meeting of the Alaska Board of Game, the National Park Service submitted a proposal to extend the eastern boundary of the Stampede Closed Area. Instead, the Board of Game decided to eliminate both closed areas and allow hunting and trapping wolves in all areas bordering the park.

In 2010, Denali National Park and the University of Alaska Fairbanks, with the cooperation of the Alaska Department of Fish and Game, began a study of wolf movements, wolf survival, and wolf viewing opportunities along the Denali Park Road. During the course of the study in 2012, the death of a breeding female from a pack that lived along the Denali Park Road was followed by a drop in wolf sightings. This was one of several instances where the death of an individual wolf, from legal trapping or hunting, sparked widespread media attention and concern in recent years.

Unfortunately, the national reputation of the State of Alaska in terms of its commitment to wildlife tourism was damaged when the Alaska Board of Game rejected a petition urging the Board to enact a wolf buffer (no-trapping/no-hunting) zone on a small parcel of state land along the eastern boundary of Denali National Park in 2012. Sadly, wolf densities for the past three years have been the lowest in Denali since 1987. The number of wolves in Denali has declined from 147 in fall 2007 to only 49 now, and the number of wolf family groups (“packs”) declined from 20 in 2008 to only nine now. Visitor wolf-viewing success has declined from 45 percent in 2010, when the buffer was eliminated by the state, to only 5 percent last year.

More than 530,000 visitors come to Denali each year, about 50,000 of whom are Alaskans. Many cite the opportunity to see wolves as one of their primary objectives for visiting the park. A journey to Alaska requires a substantial financial investment on the part of those visitors. It would be unethical for us to ask our supporters to spend their hard-earned dollars on such an experience when, in all probability, they may not see the very wildlife they expected to see during a “wolf-watching” adventure.

Beyond eco-tourism, it is important to note that a healthy wolf population is more than x-number of wolves inhabiting y-square miles of territory. The notion that we can “harvest” a fixed percentage of an existing wolf population that corresponds to natural mortality rates and still maintain a viable population misses the point. It’s not how many wolves you kill, its about which wolves you kill. Natural losses typically take younger wolves, whereas hunting and trapping take the older, experienced, wolves that are essential to the pack’s sustainability. They know the territory, prey movements, hunting techniques, denning sites, pup rearing and teaching. When a breeding wolf is killed by humans, it sets off a chain of events that leaves the rest of the pack at serious risk of survival.

Denali is one of Alaska’s top tourism attractions, and is responsible for more than $500 million in economic activity each year in Alaska. Wolf viewing rates are an economic indicator in a tourism economy where many of our supporters say the prospects of seeing a wolf is the reason they want to visit Alaska. The state should realize the obvious ecological and economic benefits of restoring and sustaining the wildlife of Denali but has yet to hear the voices of countless wildlife educators and conservationists.

In addition, such practices as wolf bounties and wolf trapping send a clear signal to potential visitors that the locals do not respect the wolf’s place as valuable native wildlife. If, however, the proposed buffer zone were enacted, we believe we could reasonably assure our supporters that all was being done to encourage a positive and rewarding eco-education and tourism experience.

It is clear that the Alaska Board of Game needs to reassess their intent and ask what part of the public their decisions serve. What narrow special interests are pushing for no buffers? Do the majority of Alaskans really go out to hunt and trap wolves? When all the facts are weighed, we believe the perceived need to kill wolves will appropriately dissipate.

Thus, we support the Alaskan people in their recent petition to Alaska’s Governor Walker which asks for three significant adjustments to
the current predator control/Intensive Management (IM) practices which would dramatically reduce the unnecessary killing of Alaska’s wolves and bears. Not only will our organization be able to fulfill its educational mission, but the resulting positive ecological and economic impacts will benefit Alaska’s wild ecosystems, its citizens and its tourism industry.

*Wolf Conservation Center Executive Director, Maggie Howell*
Board of Game,

My name is Ron Yarnell. I own a wilderness guiding business. I have been leading trips in Alaska’s wilderness areas since 1971. Our clients come from all over the world to see the world class wilderness & wildlife found in Alaska.

For the last ten years or so Denali National Park has had a lot of bad press, because of the loss of the popular wolf pack in the Toklat River area. This is a real shame. For visitors, seeing a wolf is one of the greatest experiences of their visit to Alaska.

The unique situation along the Stampede Road has made it difficult to control the hunting & trapping of wolves that stray out of the park. A buffer zone solves this problem.

It is way past time to once again reinstitute this buffer zone.

I urge the Board of Game to approve Proposal #142. It is the right thing to do. This situation has gone on far too long.

Sincerely, Ron Yarnell
I SUPPORT PROPOSAL 142 TO ESTABLISH A NO HUNTING/TRAPPING BUFFER ADJACENT TO DENALI NATIONAL PARK!
I am writing in support of Proposal 142.

Time and again Alaskans have shown their support of wolves and the conservation of their populations. To wit, the many times we have voted against aerial hunts.

The Board has an opportunity to create a no hunting/trapping area in the Stampede Corridor/Nenana Canyon and should do so. We know that wolves travel beyond the borders of Denali National Park, so to not give them a natural buffer means the packs that are protected within the Park are actually at great risk.

Though wolves have an inherent value within a healthy ecosystem we also know that they are of high value to Park visitors, an important economic contributor to the state.

The Board has the authority and, I believe, responsibility to manage wildlife for conservation purposes. We know that without this buffer we will lose even more Denali wolves.

Please do your part to ensure the desire of a majority of Alaskans, which is the creation of a buffer to protect wolves in this small but critically important area, is upheld.

Thank you for the opportunity to provide comment.
To Whom It May Concern, I urge you to support Proposal 142 for the following reasons: There is much we do not understand about wolves still and like so many other species, they form part of complex ecological webs. In addition, the wolf populations of Denali are a major draw for tourists and therefore catalyze significant revenues to the state. In their occupation and migration across territory, wolves are unable to discern the boundaries and borders that humans draw and this makes them extremely vulnerable to predation from humans. Finally, I think it is the responsibility of all human beings to concern and protect the extraordinary wilderness and wildlife that makes Denali what it is. My time there over several weeks was wondrous and I promised myself when I left that I would return again. Thank you for considering my comments when you make your decision.
As a concerned citizen and property owner in the Village View Subdivision, located 8 miles south of the Denali Park Road, I support Proposal 142.

I strongly urge the Alaska Board of Game to exercise its authority and responsibility to support conservation of the remaining wolves in Denali Park. The diminishment in numbers of the Park’s wolf population will continue if trapping near the Park is allowed. It goes without saying that wolves, smart as they are, still can’t recognize the line drawn on a map that signifies the Park boundary. It is the Board of Game’s duty to conserve the remaining wolves by protecting their home territory, and the most easily achieved option is to stop humans from trapping/killing Park wolves.

I sewed furs for many years in the 80’s and 90’s, back when I lived in Nome, Denali and Fairbanks, spending a lot of time in the cold with my dog team. Plenty of my fur mittens, ruffs, and hats kept a lot of other Alaskans warm. I bought a lot of wolf pelts, along with beaver, fox, marten, etc. I mention this only because I am not anti-trapping – rather, I am pro responsible trapping.

But the Denali Park wolves need to be conserved – they not only are a tourist attraction, but also offer opportunities for scientific study in a reasonably reachable and known environment. Once their very limited number has declined to a non-sustainable pack, we could very well lose their precious presence for a very long time, and perhaps forever.
I SUPPORT PROPOSAL 142 TO ESTABLISH A NO HUNTING/TRAPPING BUFFER ADJACENT TO DENALI NATIONAL PARK!

- There is a precedent for a no hunting/trapping area in the Stampede Corridor/Nenana Canyon. In 2001-02 the Board acknowledged that the park wolves were a valuable resource for visitors, and set aside areas closed to hunting. The park's wolf population (Spring 2002) was 97 wolves, far more than inhabit the park now.

- The Board has both the authority and the responsibility to manage wildlife for conservation purposes. A majority of Alaskans support creation of a buffer to protect wolves in this small but critically important area.

- The wolves that frequent the Corridor/Nenana/Park Road area are an important scientific resource. They are the subjects of some of the most-famous, longest-running scientific studies of wolf packs in the country. Hunting activities which ultimately result in the loss of entire packs abruptly and prematurely end decades of research.

- Visitors to Denali want to see wolves, and they spend a lot of money for the opportunity. No wolves - or news that the state routinely allows wolves to be killed adjacent to the park for lack of a very limited buffer area - are black eyes for Alaska tourism. The millions of dollars tourism brings to the Denali area and the entire state are now, more than ever, crucial to our economy.

- A mere 4 percent chance that a visitor will spot a wolf along the Park Road (as documented by the National Park Service in 2015) is an abysmally low number. Before the buffer was scrapped in 2010, nearly 50 percent saw a wolf.
Please give the wolves your protection.
Wolves need protection from hunters, trappers, and others. They are important to balanced wildlife ecology, to healthy wilderness as a keystone species. They are also more important to your economy than hunters and trappers, as a tourism drawn and the image of your state. Hunters and trappers Only harm the wildlife ecology by their remunerative and recreational killing, and by the additive nature of their depredations. It is not the wolves that Jill's Too many ungulates, it is the hunting.
Submitted By
kate johnston
Submitted On
1/29/2017 4:39:52 PM
Affiliation

Please set restrictions on wolf hunting in your beautiful State. I am a former resident. Thank you. Kate Johnston
Are you crazy to allow further hunting of wolves? Your #1 resource is your natural resources...don't go screwing it up like the other 49 states!
Please don't kill the wolves for trying to survive. They are innocent and are only doing what’s been done for generations. You could try relocation of wolves and of their prey. If you kill our wildlife there may not be any left someday and it will be too late to save them. Hunters just want a trophy for their living rooms. Thank you for your time.