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ALASKA BOARD OF GAME
Southeast Region Meeting
Juneau, AK | January 11-15, 2019

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*(These comments can be found on the meeting information webpage:
www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo&date=01-11-2019&meeting=petersburg.)*



Submitted By
Jake Abbott
Submitted On
12/28/2018 12:34:07 PM
Affiliation

~~Members of the board,

I am writing in support of proposal 23 and 28.

I am the author of both of these proposals, and will outline my reasons for submitting them below.

Proposal 23 seeks to expand the RG014 archery only registration hunt area near Juneau. The current boundaries include all drainages south of Little Sheep Creek draining into Gastineau Channel and Taku Inlet, as well as the south side of the Blackerby Ridge area above the 1,000 foot elevation.

This current boundary area is at times confusing, and eliminates a significant amount of area that could be expanded and included in this hunt.

This hunt is already a self-limiting hunt since goats may be only taken with bow and arrow, and thus a bow hunter certification is required. This eliminates a large portion of hunters, and will lead to a hunt that is not heavily pressured.

The Alaska Department of Fish & Game (ADF&G) readily admits that there is a surplus of goats in this expanded area, specifically the Mount Juneau area. I sat through the Juneau-Douglas Advisory Committee meeting and listened to ADF&G's reasoning for opposing this proposal. One of their reasons for opposing it was they were concerned that if this area was opened to hunting, it would adversely affect the goat population in that area and they would possibly not rebound. I found this confusing since they also readily admit that there was a surplus of goats in that area. It has been my experience that ADF&G's point based system of managing goat populations has been extremely successful, and I find it discerning that in this instance, ADF&G seems to be arguing against their own ability to effectively manage an expanded hunt area with that system. Also, ADF&G would still retain the ability to close down by emergency order, specific zones within this expanded hunt area if specific groups of goats were to become adversely affected.

When I read between the lines here, my perception is that the opposition to opening this area comes from the fear that doing so would adversely affect other non-consumptive user groups, and their viewing ability for these goats. I find this argument invalid, since this proposal does not seek to harvest every single goat in the expanded area, rather, just an allowable percentage. After all, isn't the mandate maximum sustainable yield?

I believe that expanding this area will allow for more harvest opportunity, and provide access to a valuable resource that we are lucky to have around the Juneau area. This hunt would literally be out our back door and provide an excellent opportunity to those hunters who do not wish to venture out in their boats during what can be weather-wise on the water, one of the most difficult time periods of the year.

Proposal 28 seeks to clarify, or allow black bear baiting in GMU 1C, the area surrounding Juneau. I am in support of this proposal and would like to see black bear baiting allowed in GMU 1C.

Under current regulations, **5AAC92.044** allows the use of bait to take black bears statewide under the authority of a permit issued by ADF&G. **5AAC92.044(b)(5)** restricts the proximity to certain, roads, residences, campsites, recreation areas, and trails, in which bait stations may be placed.

Under the current regulatory scheme, bear baiting is "technically" legal in GMU 1C, but a hunter cannot legally do so since ADF&G refuses to issue a permit for this area. This decision seems to be arbitrary, and I question whether ADF&G has the authority to just not issue a permit absent an emergency order.

This creates a sort of legal black hole for myself when it comes to this proposal, as what I am seeking to legalize is technically legal, ADF&G just will not issue the permit.

I am seeking an amendment to **5AAC92.044** which will require ADF&G issue a permit to hunters in GMU 1C to take black bears over bait, or to have the board direct ADF&G to issue these permits.

When considering this proposal, I think it is important for the board to consider that this permit is not a "permit hunt," such as a registration hunt permit, but rather, it is a permit to use a certain method & mean. ADF&G not issuing this permit to hunters is akin to the department saying that hunters may not use rifles in a general season deer hunt, as both rifles and baiting are considered methods & means under Alaska regulations, and not hunts.

I also think it is relevant for the board to consider whether or not ADF&G has the authority to limit methods & means used in hunts absent a regulation adopted by the Board of Game, or promulgated under the Administrative Procedure Act (APA). I believe the Alaska Supreme Court ruling in **Estrada v. State** further supports this argument. In this ruling, the Alaska Supreme Court ruled that the administrative creation of a harvest limit on a subsistence permit by ADF&G without going through the APA was unlawful. Similarly to this, the Board of Game under **AS16.05.255(2,3)** has the authority to adopt in compliance with the APA, regulations establishing open and closed seasons,



and methods and means. I believe that ADF&G not issuing a permit under **5AAC92.044** is effectively creating a regulation without the appropriate steps required by the APA. A similar case to this related to Board of Game regulations is ***State v. Tanana Valley Sportsmen's Association***.

In speaking with ADF&G, I have found that the number one concern with issuing bear baiting permits in GMU 1C is public safety, and whether or not allowing this activity to occur will further aggravate the trash bear issue that exists in Juneau. I believe that by the requirements for placement of a bear bait station in **5AAC92.044(b)(5)** this problem will be almost completely alleviated as there are strict requirements for the proximity of bait stations to residences, recreation areas, roadways, and trails. When these requirements are taken into consideration; it becomes clear that the majority of the core Juneau area will be closed to baiting by those requirements alone, further alleviating concerns that this will aggravate bear issues. I also believe that there is no historical, or anecdotal evidence to show that bear baiting will further aggravate the trash bear problem that exists in Juneau. Currently, bear baiting is allowed on the Kenai Peninsula, the Mat-Su valley, and the Fairbanks areas. These areas are also heavily populated, and bear baiting seems to work there. I also think it is worth noting that Juneau is not the only town in Alaska that has issues with trash bears.

Bear hunting in southeast Alaska traditionally occurs in the spring, and is boat based with hunters targeting bears feeding on beaches and estuaries. Bear baiting is already currently allowed in the majority of southeast Alaska, and seems to occur with little to no issues. Allowing this to occur in GMU 1C will provide a method by which archery hunters, and hunters without boats, can selectively and, successfully harvest quality animals. I also believe that allowing this to occur may have an un-intended side effect of actually pulling bears away from the Juneau area by providing a food source outside of the core town.

I also think that it is worth noting that during the Juneau-Douglas Advisory Committee (JDAC) meeting, the JDAC overwhelmingly voted in favor of this proposal with 11 members voting in favor, 1 voting against, and 2 abstaining.

I understand at times that the subject of bear baiting can be a contentious one among user groups. I am just struggling to see why the Juneau area has to be so different from the majority of the state in regards to the legality of this activity. Especially absent any hard evidence to show that bear baiting will create anymore, or any less unintended bear-human interactions.



Submitted By
Thor Stacey
Submitted On
12/28/2018 9:45:57 AM
Affiliation
Alaska Professional Hunters Association

Phone
9077231494
Email
office@alaskaprohunter.org
Address
PO Box 240971
Anchorage, Alaska 99524

December 28th, 2018

Dear Alaska Board of Game Members,

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

Guided Hunt Allocation Benefits Resident Hunters, Visiting Hunters, Guides & Non-hunters

APHA commissioned its first socioeconomic report with the McDowell Group in 2014, titled *"Economic Impacts of Guided Hunting in Alaska."* More recently (2017), APHA partnered with SCL to add to and update McDowell's 2014 seminal work. *"The Economic Importance of Hunters Visiting Alaska; Alaska's Guided Hunting Industry 2015"* provides new information on funding for conservation that our visiting clients contribute to wildlife management. Guiding hunters is primarily an activity that occurs in rural areas of Alaska.

<ul style="list-style-type: none"> 87.2 Million total economic output (2015) 	<ul style="list-style-type: none"> 52.5 Million new dollars to Alaska (2015)
<ul style="list-style-type: none"> More than 50% economic benefits occur in rural areas (2012, 2015) 	<ul style="list-style-type: none"> 1,550 people directly employed, total employment with multipliers; 2,120 (2015)
<ul style="list-style-type: none"> 89% Active Guides are AK Residents (2012) 	<ul style="list-style-type: none"> Visiting hunters (guided & non-guided) purchase 13% of total Alaska hunting licenses (2015)
<ul style="list-style-type: none"> Guided hunters are approx. 3% of total hunters in the field (2015) 	<ul style="list-style-type: none"> Visiting hunters (guided & non-guided) contribute 72% of total revenue to the ADFG wildlife conservation fund (2015)

Significance to Alaskans & Meat Sharing



Guiding hunters in Alaska has its origins in Territorial days. Because of our rich history, guides have deep roots in communities across Alaska, with many guides living in remote communities or "Bush Alaska." APHA worked with McDowell to quantify what some of the benefits Alaskans reap from Guided Hunting. In 2015 30 million new dollars went to Alaska business that were directly attributed to Guided Hunting. This generated another 20 million in economic activity in the support sector. Hunting guides do what they can to share the harvest; 230,000 lbs of well cared for, high quality game meat was shared with their fellow Alaskans in 2015.

Individual Proposal Comments

Below you will find our comments on individual proposals under your consideration for Region I regulatory change. 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 every Region in the state. 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 3- OPPOSE

Conservation Concerns:

Guides in Region I expressed a variety of conservation concerns in opposition to proposal #3. Our members were unanimous that shooting from a boat will result in additional big game animals that are struck and run into the thick forest but are never followed up and recovered by the shooter. After all, nearly all of the hunting areas accessed by boat in Region I are influenced by extreme tidal fluctuations and medium to high energy ocean wave action. Proposal #3 does not require that a hunter, after shooting at an animal, make land fall to determine if they hit the animal or not. We envision a variety of scenarios where hunters will get excited and choose to shoot from a vessel but will not make landfall to follow the animal up. It is also important to consider that Region I offers vessel based hunting opportunities for iconic and valuable species such as brown bear, coastal black bear, moose and mountain goats. APHA is concerned that proposal #3 will unnecessarily increase human caused mortality that will not be accounted for in harvest records. APHA is opposed to proposal #3 based on conservation concerns related to unreported and wasteful human cause mortality.

Proposal 4- Oppose

APHA opposes the wasteful take of wildlife. Our membership felt strongly that deer should not be treated differently than any other wild animal important to subsistence in Alaska. Each year guides carefully handle and preserve hundreds of thousands of pounds of valuable wild meat in Alaska. In a recent report, APHA document that in 2015 alone hunting guides shared 240,000 lbs of meat with their fellow Alaskans. As guides we appreciate and respect the value of wild game. Edible deer meat should be salvaged, well cared for and eaten or shared with the less fortunate.

Proposal 7- OPPOSE

Conservation Concerns:

APHA opposes proposal #7 based on conservation and management concerns. Bear sealing data in most of Region I represents the best available data for managers to base their management decisions on. See department comments on proposals 49 & 50. Last year significant changes were made to Unit 9 brown bear seasons based on sealing and other harvest data. APHA oppose proposal #7



because skull sealing data is the most cost effective and realistic method to estimate harvestable surplus for bears in Region I at this time.

Proposal 8- Take No Action- (reference other comments)

Recommended Action:

APHA recommends tabling and taking no action on *proposal #8* because the proposal is seeking relief from a condition that does not exist. There is no current requirement for non-resident black bear hunters to hunt with a guide in Region I.

Background & Nonresident Black Bear Hunting Options:

During the 2010 Region I Board of Game meeting in Ketchikan the board adopted *proposal #37* “require(ing) a drawing permit for non-resident black bear hunters who did not enlist the services of a registered hunting guide.” (2011, ADFG; Board of Game Direction on Black Bear Guide Allocations and Harvests in South East Alaska, pg. 1)

The resulting hunt structures created multiple avenues for non-residents to hunt black bears in the same units:

1. retain the services of a registered hunting guide and hunt under harvest tag (GMUs 1,2, 3 & 5)
2. apply for a drawing open to all non-residents not hunting with a registered guide (GMUs 1,2 & 3)
3. secure a registration permit in areas managed by draw where hunts are “under subscribed” (GMUs 1,2 & 3)
4. hunt in portions of Region I managed by harvest ticket either with or without a registered guide (GMU 5)

Prop. #8 Would Unfairly Benefit Nonresidents:

Proposal #8 seeks to “equally limit(ing) all nonresident black bear hunters because of conservation concerns.” If the board or the legislature were required to adopt regulations that equally restricted all classes of non-resident hunters they would be conferring an advantage not currently enjoyed by resident hunters. Resident hunters are currently managed through a variety of allocation schemes to include but not limited to: archery only hunts, non-motorized hunts, youth hunts, early and late season hunts for the same species in the same management area, antler or horn restrictions vs. any animal of a given sex. In fact these various allocations are necessary as the Board of Game works towards maximizing the benefit of the resource for the “state and its people.” Proposal #8 seeks to equally limit non-residents and thus imbue a privilege not currently enjoyed by resident hunters.

Prop. #8 Would Degrade the Value of a Limited Black Bear Resource:

Proposal #8 seeks to unwind a well-reasoned decision to allocate between guided and non-guided nonresident hunters. During testimony in Ketchikan during the 2010 Board of Game meeting a strong record was built that guided nonresident black bear hunters had lower rates of conflict in the field, the guide businesses were locally owned and that hunting guides are able to add more value to a black bear hunt than a non-guided commercial service. During that time it was also clear that resident hunters enjoy hunting black bear in Region I. Proposal #37 was passed to ensure that the limited number of guided black bear hunts available to the highly regulated guide industry would remain available in a way allowing for the maximum return for the publicly owned resource. Prop. #8 would undue the good work of the board and degrade the overall value of the guided black bear opportunities in Region I by causing guides to lower their prices to ensure drawing hunt participation. If passed, proposal #8 will have the effect of reducing the total value of black bear hunts in Region I while doing nothing to add value back to the resource or local economies.

AS 16.05.256. Nonresident and Nonresident Alien Permits-



“Whenever it is necessary to restrict the taking of big game so that the opportunity for state residents to take big game can be reasonably satisfied in accordance with sustained yield principles, the Board of Game may, through a permit system, limit the taking of big game by nonresidents and nonresident aliens to accomplish that purpose.”

When the board passed Prop. #37 in 2010 it acted within the broad statutory authority conveyed by AS 16.05.256. The board was clear, the new hunt structure was designed to limit nonresidents and nonresident aliens to benefit resident hunters. As a result, resident hunters still enjoy a “2 bear” annual limit in all of Region I, while nonresidents and nonresident aliens enjoy various restrictions.

Proposal 9- Support with Recommendations

Overview:

APHA supports repealing the requirement for nonresidents not hunting with a guide to draw a tag in the portions of GMU 1 covered in proposal #9. APHA recommends that the department carefully monitor these hunt areas for increased transporter or outfitted nonresident black bear hunting. Hunting guides utilizing 1B, 1C & 1D are strictly limited in the number of black bear hunts they may take by the US Forest Service. If conservation concerns develop from an increase in non-guided commercial hunting, sustainable hunting guide businesses will needlessly suffer as conservation concerns are necessarily addressed.

Conservation:

APHA defers to the department; black bear populations are sustainably harvest in GMU 1B, 1C & 1D. Proposal #9 seems well thought out and unlikely to cause conservation concerns in the near term.

Recommendation:

APHA would like to recommend that a mechanism be put in place to track big game commercial service use in GMU 1B, 1C & 1D and that managers be given the discretion reinstate the current drawing hunt for nonresidents not using a hunting guide in the units. APHA requests that a report on the status of big game commercial services in GMUs 1B, 1C & 1D offering black bear hunts be given to the board during the next Region I meeting in 2021.

Proposal 35- Support

APHA support the additional opportunity provided by proposal #35.

Proposal 42- see comments on proposal #43

Proposal 43- SUPPORT

Conservation:



APHA supports wise use and conservation of our wildlife resources. Proposal #43 represents a necessary update to wolf management and wildlife conservation in unit 2. APHA strongly supports this update to scientific wolf management.

Proposal 49 & 50- Support with Amendment

Suggested Amendments:

- APHA recommends the current “up to” number of nonresident tags not using a guide remain unchanged
- APHA recommends nonresidents within the second degree of kindred, who are hunting with a resident relative, be able to receive an over the counter-harvest-ticket with a one bear baglimit
- APHA commits to working with guides, landowners and the department to make additional harvest opportunity available for “guided nonresidents” as long as the additional harvest meets conservation objectives

Overview:

APHA appreciates and supports past board actions to ensure sustainable harvest of the large coastal black bears in GMUs 2 & 3. APHA is especially appreciative of the collaboration between the board, department, industry and the US Forest Service to achieve the maximum benefit to the public from nonresident black bear hunting as hunting opportunities were necessarily restricted to achieve conservation goals. As an industry, we are proud of our partnership and the area’s guide’s willingness to hold their harvest down on what amounts to a “hand shake” agreement with the board. Proposals 49 & 50 really embody the spirit of stewardship and the long-term successes that are enjoyed from restricting harvest in the short-term.

Conservation:

APHA facilitated multiple teleconferences and discussions with members and non-members who guide in GMUs 2 & 3. While there was some disagreement about whether or not it was the reduction in harvest in 2012 or ongoing intensive management ultimately led to improved numbers of black bear, there was unanimous agreement that bear numbers have improved since 2012. APHA supports increasing harvest in GMUs 2 & 3 based on an improved population of black bears in GMUs 2 & 3.

Allocation:

Hunting guides in SE Alaska are overwhelmingly local, small businesses. Virtually 100% of the registered guides permitted in GMUs 2 & 3 are Alaska residents. According to McDowell, each guided hunt in Alaska brings \$27,000 of economic activity to our economy. However, guides are just one of the commercial uses. Non-guided nonresidents often patronize transporters, lodges (usually licensed transporters) or outfitters. At this time it is estimated by local guides that less than 50% of the Region’s transporters and lodges are Alaskan owned. Further, there is little or no data describing the economic impacts generated by the lower priced transported or outfitted hunts. Even if transporters or lodges are receiving similar prices for their services, they have a lower rate of Alaskan ownership thus a reduced economic benefit to Alaskan communities.

Guides are Alaskan and the hunts they offer are much more valuable to the state than transported or lodge-based trips. Black bears in GMUs 2 & 3 are susceptible to over harvest.

APHA asks that the board give an allocation preference to nonresidents purchasing guided hunts because this is a better return for a finite resource.



Resident Hunters:

APHA has always recognized that resident hunters enjoy black bear hunting in southeast Alaska. We further recognize that the harvest level and conservation challenges that led to the new hunt structures put into place in 2012 were not driven by resident hunter harvest. APHA supports future hunts structures that keep resident seasons and bag limits in place.

Nonresident Relatives:

Hunt structures put into place in 2012 had the unintended consequence of restricting nonresident relatives travelling to Alaska to hunt black bears with their relatives. Nonresident relatives represent a very small segment of the hunting effort, so small that their impact on the bear population is inconsequential. APHA supports nonresidents relatives, within the second degree of kindred, being able to hunt with an over the counter harvest ticket, just like guided nonresidents.

Proposal 52- SUPPORT

APHA supports proposal 52 as a necessary update to harvest reporting requirements for black bears.



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

ATTN: BOG COMMENTS

12/1/18

Alaska Department of Fish and Game
Boards Support Section
PO Box 115526
Juneau, AK 99811

Dear Chairman Spraker and Members of the Board:

I'm writing on behalf of the more than 900 members of the Alaska Trappers Association, especially those who live in Southeast Alaska. We appreciate the opportunity to offer the following comments on proposals for the Southeast region, that you will be considering at your January 2018 meeting in Petersburg.

Proposal 10: With all due respect to the Upper Lynn Canal fish and Game Advisory Committee, The ATA does **not support** this proposal.

- Coyotes are a very resilient species that is difficult if not impossible to over harvest.
- They are not sealed elsewhere in the state.
- We feel the sealing process would just create work for the department and would result in file data that served no productive purpose.

Proposal 11: ATA **supports** this proposal. There is an ample beaver population with relatively low trapping pressure and a depressed market. The existing sealing program would identify any harvest level that might create a concern.

Proposal 12: This proposal addresses a complex issue with numerous tentacles. With all due respect to Southeast trappers, the ATA **defers** to the judgement of the Board.

Proposal 13: ATA is vigorously **opposed** to this proposal.

- It would be a nuisance rule that would be subject to abuse.
- It is too easy for an ill-intentioned person to mess with (ie relocate) the identification tags.
- Diligent law enforcement officers generally know who traps where. If they don't, it is not difficult to find out.
- Such a requirement would be a burden on trappers.
- This is a favorite proposal of the anti-trapping community. It is an old issue that has been debated many times. Nothing has changed.



Proposal 14: ATA is **opposed** to this proposal. ATA recommends that trappers use signs to identify the area where traps are set. However, trapline signage is, and should be, optional. Signage on each set is unnecessary. It would be a substantial burden on trappers who put out hundreds of sets, often in country that no one visits, except the trapper.

Proposal 22: ATA **supports** this well-written proposal. Douglas Island is not isolated in a manner that allows for specific management of its wolves, which can move freely to and from the island. The "management area" designation serves no real purpose.

Proposal 31: This proposal would increase local trapping opportunity without creating conflict. It shows great insight by local trappers. ATA eagerly **supports** it. We **defer** to the judgement of the Board on the definition of "submerged."

Proposal 32: ATA **opposes** this proposal. It appears simply to be a local anti-trapping measure. We are unaware of any issue it is attempting to resolve. Such a closure is unnecessary and would probably be difficult to enforce.

Proposal 38: ATA **supports** this proposal for the same reasons we support Proposal 11.

Proposal 42: ATA **supports** this proposal. The resource can support additional harvest. The current regulation is unnecessarily restrictive.

Proposal 43: ATA **supports** this proposal for the same reasons it supports proposal 42. Monitoring by the Department would identify any resource population issues in the unlikely event that such issues might arise.

Proposal 44: ATA **supports** this proposal. It would offer uniformity to the wolf trapping season and apparently the resource is capable of supporting additional harvest. We object to any efforts by federal agencies to manage natural resources which belong to the State.

Again. The Alaska Trappers Association appreciates the opportunity to participate in the regulatory process.

Sincerely,

A handwritten signature in black ink that reads "Randall L Zarnke".

Randall L Zarnke, president



Submitted By
Robert Armstrong
Submitted On
12/26/2018 11:14:47 AM
Affiliation

Phone
9075866811

Email
bob@discoverysoutheast.org

Address
19200 Williwaw Way
Juneau, Alaska 99801

I oppose: PROPOSAL 23 5 AAC 85.040(a)(1). Hunting seasons and bag limits for goat.

The current closure of this area for goat hunting, in my opinion, has made it one of the best areas to watch goats in Alaska. The goats in this area do not seem to have the fear of humans that they normally do in areas where they are hunted. I believe that allowing this type of hunting would cause them to move away from humans and cause some of the places currently valued for goat watching to decrease considerably. In particular:

1. In the Nugget Falls area at Mendenhall Glacier goats typically move down fairly low for feeding and resting. Lots of tourists and locals visit this area to watch and photograph the goats. In general I have noted that when people bring their dogs along the goats move back up the mountain and show an obvious fear of them. In most instances the presence of humans seems to not bother them. Overall the U.S. Forest Service encourages and educates tourists about the goats and most seem to be really thrilled to see them.
2. The rock peninsula in front of the glacier is a wonderful place to get close to goats. I have often sat in different areas and had goats behaving "normally" with no obvious fear of my presence. This area can be easily accessed in winter by crossing the ice on the lake or later from a trail.
3. Mount Juneau is considered a goat watching place. An interpretive sign near the wharf in Downtown Juneau discusses this and shows where to look. This is also emphasized by Gastineau Guiding at the top of the tram. When I am hiking up there most people I see are looking over at Mount Juneau and talking about the goats. Since there is a trail to the area on Mount Juneau I suspect, if hunting is allowed, when people go up there the goats would vacate the area.
4. Along and near the Mt. Roberts Trail. When the tram first opens goats can often be seen feeding close by which seems to really thrill the tourists and locals. There is a place not far from the Tram in the "Bear Valley" area where goats bed down for the winter.

I believe allowing bow hunting would contribute to goats developing a fear of humans in these areas and decrease the wildlife viewing opportunities considerably.



December 27 Comment on ADF&G Board of Game Proposal #22 for Removal of hunting quota for Douglas Island Wolves, to be considered at the board's January 11-15, 2018 meeting in Petersburg, Alaska

I OPPOSE BOG PROPOSAL #22.

My name is Bruce H. Baker and I reside at 10738 Horizon Drive, Juneau, Alaska 99801. I live on north Douglas Island, have hunted with rifle or camera in the Juneau area for more than 40 years, and OPPOSE Proposal #22 because it would remove the annual 3-wolf harvest quota for Douglas Island. The Douglas Island Management Unit in GMU 1-C was set up years ago to restrict the number of wolves that could be killed on the island to no more than 3 per year. It became a heated public issue when a single Juneau trapper targeted an entire pack on the west side of the island and killed them all. The Game Board at the time recognized that a reasonable number of wolves had a place on the island and that other non-consumptive wildlife interests deserved to be able to appreciate them as well. The goal of the existing regulation has been to guard against an over-harvest of wolves on the island, a risk that is high, given the easy access to the island by water or road.

In making this proposal, Mr. Jesse Ross provides absolutely no definitive scientific data to support his claim that if the existing regulation remains on the books, ". . . wolves will continue to suppress the deer population on Douglas Island and further decrease the sport hunting and wildlife viewing opportunities." He provides no biological data that conclusively demonstrates that public opportunities to harvest or view deer or wolves on Douglas Island are significantly out of balance.

Proposal #22 is a proposed solution to a problem that hasn't been proven to exist. It's a clear case of "If it ain't broke, don't fix it."

/s/ Bruce H. Baker



December 27 Comment on ADF&G Board of Game Proposal #23 for Allowing Archery Hunting of Mountain Goats on Mt. Juneau and Nearby Areas, to be considered at the board's January 11-15, 2018 meeting in Petersburg, Alaska

I OPPOSE BOG PROPOSAL #23.

My name is Bruce H. Baker and I reside at 10738 Horizon Drive, Juneau, Alaska 99801. I have hunted mountain goats with rifle or camera in the Juneau area for more than 40 years. I OPPOSE Proposal #23 because it would open the area including Mt. Juneau, Mt. Roberts, and the entire area from the Mendenhall river/glacier to Taku river/glacier to archery goat hunting (except killing nannies with kids would be prohibited August 1 – November 30). The area is currently closed except for an area around Blackerby Ridge.

The area proposed to be opened to goat hunting is heavily used by Juneau residents and visitors for hiking and mountain goat viewing. For many folks, this is their only opportunity in a lifetime to see goats from a respectable viewing distance and to watch the animals' behavior.

By the late 1980's, mountain goats had been eliminated from Mt. Juneau and its ridges. The main cause was over-hunting. Goats were even shot on Mt. Juneau in plain sight of people in downtown Juneau who were viewing them! After that, I was proud to contribute, along with many other Juneau residents, to help fund the transplant of mountain goats from the Snettisham area to Mt. Juneau. ADF&G cooperated and assisted in this effort. In the years since the re-introduction of mountain goats, they have once again become a popular attraction to Juneau residents and out-of-town visitors, whether they are seeing them from downtown Juneau, or while hiking the extremely popular trails above tree line, one of which is even accessible by cable car. Mountain goats are more valuable as a non-consumptive wildlife resource on the ridges and mountains in the proposal area. In fact, the economic value of viewable mountain goats has increased in the area as tourism has increased.

There are other opportunities for goat hunting in northern southeast Alaska, including areas farther out the Juneau road system.

/s/ Bruce H. Baker



December 27 Comment on ADF&G Board of Game Proposal #28 for Allowing Bear Baiting in Juneau, to be considered at the board's January 11-15, 2018 meeting in Petersburg, Alaska

I OPPOSE BOG PROPOSAL #28.

My name is Bruce H. Baker and I reside at 10738 Horizon Drive, Juneau, Alaska 99801. I have hunted in the Juneau area with rifle or camera for more than 40 years. I OPPOSE Proposal #28 because it would open the Juneau area (1C) to black bear baiting. This practice of baiting has been prohibited in the Juneau sub-unit for more than two decades, as an acknowledgement of the many problems the community has had with bears that have become conditioned to human placed food. Luring bears to bait stations would exacerbate this perennial problem.

Similarly, the purposeful conditioning of bears to human placed food is likely to increase the number of human-bear encounters and result in human safety problems.

In short, bear baiting not only contradicts the principles of fair chase hunting, it is also totally inconsistent with community-wide efforts to encourage the more than 30,000 of us Juneau residents to manage our garbage in a way that does not encourage the conditioning of bears to human placed food.

/s/ Bruce H. Baker



Submitted By
Jos Bakker
Submitted On
12/26/2018 1:19:15 PM
Affiliation

Proposal 13

5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.

Require identification tags for traps and snares in Units 1-5 as follows:

I **strongly SUPPORT** this proposal.

- 1.As a non trapper I would like to see tags on traps so I can contact authorities with the info when I see a problem.
- 2.Troopers can deal with problems much quicker and much more effiently when information is available.

Submitted By
Jos Bakker
Submitted On
12/27/2018 3:48:03 PM
Affiliation

Proposal 22

5AAC 92.530(23). Management areas.

I **strongly oppose** this proposal 22

This regulation was set up to protect wolves on Douglas Island from overharvest after one trapper targeted and killed an entire pack of wolves. Please protect the wolves on Douglas Island.

Wolves have a very important role to play in the ecosystem. When wolves are around prey moves through nature differently. As was seen when wolves were re-introduced in Yellowstone. Deer will move around more, do not stay in open areas very long and are very wary of all creatures(humans as well). One comment on an opinion piece in the Juneau Empire says it all:" I understand the desire to kill the competition, but you should work on becoming a better hunter instead".

This proposal suggests that removal of wolves will improve hunting, which it probably does. It will make it easier again. For wildlife viewing, photography etc. it certainly is fun to see a frolicking deer. But nothing compares to seeing a wolf.

Please protect the wolves of Douglas Island.

And predator management should not be a "one fits all" strategy as suggested. Ecosystems vary widely and should be treated as a such"

I **strongly oppose** this proposal



Submitted By
Jos Bakker
Submitted On
12/27/2018 4:25:47 PM
Affiliation

Proposal 23

5 AAC 85.040(a)(1). Hunting seasons and bag limits for goats.

I **strongly oppose** this proposal 23.

After the population of mountain goats was wiped out through overhunting, it took almost 30 years to rebuild the mountain goat population, somewhat. Finally, they can be seen in several areas around Juneau.

Downtown Juneau: viewing scopes are set up for our million plus spring/summer visitors to view the mountain goats.

The Mendenhall Glacier: viewing scopes are set up to view the mountain goats.

As a former Forest Service volunteer, I had the pleasure to show many visitors the mountain goats on the mountains around the Mendenhall Glacier. Viewing of goats in de winter is a great photographic opportunity as well. Spring is magical as the nannies give birth at lower elevation and can be observed from the Mendenhall Glacier observatory. Or a short hike will bring you just a little closer.

Guided hiking trips on the many trails in Juneau have been seeing mountain goats as well.

A pair of high snow years - 2006 and 2007 – killed as much as 40 percent of the population near the Juneau road system. The population is still recovering.

I **strongly oppose** proposal 23

Submitted By
Jos Bakker
Submitted On
12/27/2018 5:33:13 PM
Affiliation

Proposal 28

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

I **strongly oppose** this proposal 28.

Please do not allow bear baiting in the Juneau area.

The Juneau area is a densely populated area due to its constricted geography and already has a chronic garbage bear problem. Luring bears to bait stations with human food would only increase this problem.

I **strongly oppose** this proposal 28



Gwen Baluss
10236 Heron Way
Juneau, AK 99801

December 22, 2018

ADF&G Boards Support Section
ATTN: Board of Game Comments
P.O. Box 115526 Juneau, AK 99811-5526

Re: Comments on Proposal #23 for Southeast Alaska, winter 2018/2019

Dear Board of Game,

Please consider my opposition to Proposal #23 for Southeast Alaska, winter 2018/2019, 5 AAC 85.040(a)(1). Hunting seasons and bag limits for goat. It would open new areas near Juneau to mountain goat hunting.

I have lived near Juneau for over 20 years. One of my favorite things to do is hike the alpine trails. Seeing goats, sometimes at close range, is often the highlight of a summer hike. I know that many locals share this excitement at seeing goats, as do the tens of thousands of visitors that come and support our economy annually. Any activity that reduces the opportunity for wildlife viewing makes Juneau a less desirable place to live and to visit. It directly jeopardizes some my neighbor's livelihood.

ADF&G would likely set very conservative bag limits due to recent lower goat counts, so a hunt might not directly affect the population in a big way. But hunting could have a huge effect on the goat's behavior. Besides making them less watchable, it could drive them to spend more time in less desirable areas, further from recreational trails. This could hurt the goat population indirectly if the new places had less forage, or places to escape predators.

As someone who does a lot of fishing and does not have to means to get out of town in a boat or plane, I understand hunters' desire for more road-system opportunities. However, I feel that allowing this hunt would be an irresponsible way to manage our shared resources. It would hurt thousands of goat-watchers, for a small benefit of a select group of hunters.

It's important to review some of the history of the area. In the 1980's residents pushed for closing areas around Juneau to hunting because they wanted to be able to see goats near town. There was even a reintroduction effort after goats around Mount Juneau had all but disappeared. The community, I believe, still values goats as much or more as they did back then and wants the chance to see them when they hike, or even when they look up from downtown or the Mendenhall Glacier Visitor Center.

Please do not expand goat hunting near Juneau.

Sincerely,

Gwen Baluss



Submitted By
Steve Behnke
Submitted On
12/23/2018 8:02:14 PM
Affiliation

Phone
9075867890
Email
srbehnke@ak.net
Address
4545 Thane Rd.
Juneau, Alaska 99801

As a 35 year resident of Juneau, and hunter, I urge you to reject proposals 22,23, and 28. These are extreme positions which would undercut the balance between hunting and non-consumptive values that most Juneau residents value.

Proposal 22 would get rid of the Douglas Island wolf quota, which was a carefully crafted compromise between potentially wiping out wolves on the island and banning all wolf hunting there. We don't need to go back to those battles between different public interests. Please leave the compromise in place.

Proposal 23 would expand bow hunting of goats. Again the existing regulations were a hard fought compromise that provides for a balance of hunting and wildlife viewing. I enjoy the chance to see goats up close on Mt. Juneau, Mt. Roberts and other areas near our incredible trail system. These are small, easily accessed populations that provide great wildlife viewing opportunities that don't exist in very many capital cities. Please leave the existing system and compromise in place. If it is changed I expect to see efforts to reduce existing hunting opportunities.

Proposal 28, allowing bear baiting in Juneau, would exacerbate existing problems of bear management. We don't need to be feeding and habituating more bears. And its totally unneeded in a place where black bears are so abundant and easy to hunt.

Please reject these three proposals that fail to reflect community values of balancing hunting and non-consumptive uses.



Submitted By
Darren Belisle
Submitted On
11/20/2018 2:48:58 PM
Affiliation

Phone
907-612-0733
Email
darren.b@aptalaska.com
Address
POP Box 56
Skagway, Alaska 99840

We would like to remove our proposal from consideration. This is proposal 12- 5AAC 84.270

Darren Belisle and Luke Rauscher



Submitted By
Mike Bell
Submitted On
12/28/2018 10:29:14 AM
Affiliation

Phone
907-518-0296

Email
bkcbell@gmail.com

Address
PO Box 171
998 Mitkof Highway
Petersburg, Alaska 99833

I urge the Board to reject Proposals 45 & 46, I do not believe they are sustainable because the bag limit of one deer no longer means anything due to the Federal Designated Hunter Program and State Proxy tags. The Designated Hunter program has gotten way out of control, almost everybody is using it and at least doubling their limit, sometimes much, much more. Until there is a limit put on how many extra tags a hunter may fill I think it would be a very bad idea to extend the deer season into November, I believe you would see a very large harvest but only for a year or two. My family has benefitted greatly for a lot of years from this program but, again, it is being used far too heavily to extend the deer season around Petersburg into the rut when the deer are the most vulnerable and hunters can get their limit one day and be right back the next day with fresh tags. Another thing to consider is the wolf and bear population, from what we have been seeing the last couple years, both populations are on the rise on Mitkof and Kupreanof. This is also going to have an affect on our deer population. Like the folks that are for these proposals I really want to hunt those first couple weeks of November but I'm afraid it wouldn't last and in a few years we would be looking to change it back again. I do agree with Fish and Games recommendation that Proposals 45 & 46 be either rejected or approved together. This will spread out the hunting pressure and be better for all. Thank you, Mike Bell



PROPOSAL COMMENTS

Alaska Board of Game
January 11-15, 2018 Meeting

From: Joel Bennett
15255 Point Louisa Rd
Juneau, AK 99801

December 26, 2018

Dear Board members,

I am a 50-year resident of Juneau, Alaska. I have been an active licensed hunter in the state for this entire period. I am also a professional photographer and recreational user, with a wide practice of wildlife enjoyment that is separate from hunting.

I was a member of the Board of Game from 1977 to 1990, and again in 1997.

PROPOSAL #4, PERMIT TO HARVEST GAME FROM A BOAT IN UNITS 1-5

OPPOSE

I believe that authorizing shooting game from a boat is to be avoided in SE Units. There is ample opportunity for persons of compromised physical ability to shoot deer from the beach in adjacent meadows in SE Alaska. The instability of a boat's shooting surface would result in a greater incidence of wounding, with the difficulty of following up a wounded animal in a timely manner. While it may be appropriate in some parts of the state, SE marine waters have not traditionally been open to this hunting method, and the status quo should be maintained.

PROPOSAL #20, CHANGE BAG LIMIT ON DOUGLAS ISLAND FOR DEER IN UNIT 1C

SUPPORT

If there is uncertainty about deer population numbers due to hunting or other pressures, it is reasonable to either reduce the number of does that can be harvested, or reduce



the overall bag limit. I support both, but at a minimum, a reduction in the harvest of does is justified.

In general, a 4-deer limit per season for deer is an extremely liberal limit. For SE Alaska. Unless harvest reports indicate that this limit is reached by a significant number of hunters, my view is that the bag limit should be adjusted downward, and the bucks-only part of the season should be lengthened in Units that have greater hunting pressure (and other stresses) than others. Douglas Island is one of those areas, with easy access to many favored hunting areas on the road system or by boat. In many years of deer hunting, both on Douglas and Admiralty island., I believe that 2 adult deer satisfy most small family needs for the year – avoiding the problem of wasted meat from freezer burn.

PROPOSAL #22. REMOVE HUNTING QUOTA FOR DOUGLAS ISLAND WOLVES:

OPPOSE

This would eliminate the Douglas Island Management Area in GMU 1-C, removing the annual 3 wolf harvest quota for the island. This Management Area was set up years ago to restrict the number of wolves that could be killed on Douglas Island to no more than 3 a year. It became a public issue when a single Juneau trapper targeted an entire pack of wolves on the west side of the island and removed them all. The Game Board at that time recognized that wolves had a place on the island--- in reasonable numbers, and that other non-consumptive wildlife interests deserved to be able to enjoy them as well. The goal of the Management Area and its quota system was to guard against over harvest of wolves on the island, something that can occur because of easy road and boat access, while allowing continuing harvest.

At the time this Management Area was adopted, the Board felt that this policy was a balanced one, recognizing that the local deer population would fluctuate, primarily in response to the severity of the winters. If wolves became a problem (and that is not supported by the data at this time), the Department quota could be raised, but a specific control on overharvest via a special management area would still be maintained overall. This policy remains sound, given the special nature of Douglas island., and the wide diversity of wildlife users that have an interest in deer and wolves on the island.

PROPOSAL #23: ALLOW ARCHERY HUNTING OF MOUNTAIN GOATS ON MT JUNEAU AND NEARBY AREAS

OPPOSE

This would open up Mount Juneau and Mount Roberts, and the entire Juneau area from Mendenhall river/glacier to Taku river/glacier to archery-only mountain goat hunting (except killing nannies with kids would be prohibited August 1-Nov 30). The area is presently closed except for an area around Blackerby Ridge. As you all know, several



areas in close proximity to the Juneau road and trail system are used by people who enjoy seeing mountain goats in the wild. In fact, it is the only chance that many may ever have.

In the late 1980's, mountain goats were completely depleted from Mount Juneau and its ridges, including Mount Roberts. The primary cause was overhunting. As a result, the area was closed to hunting. Subsequently, a project was initiated by local resident volunteers, with ADFG cooperation and assistance, to transplant goats from the Snettisham area to Mount Juneau. This reestablished the nucleus of a small herd, the descendants of which can be seen in the area in the spring and summer months. This serves a broad public interest, with people being able to observe goats without the pressure and mortality from hunting. Mount Juneau and Mount Roberts rise above the City of Juneau, and goats are often in plain view of thousands of residents and visitors.

There are alternative hunting opportunities in the more remote parts of the Juneau area to accommodate goat hunters. The mountains and drainages northland west of Mendenhall river are open, for example, and accessible from the road system.

This closure should be maintained, particularly to include Mount Juneau and Mount Roberts and its adjacent ridges, in recognition of the recreational and tourism values that would be compromised by goat hunters.

PROPOSAL #28: ALLOW BEAR BAITING IN JUNEAU AREA (1-C)

OPPOSE

This would open the Juneau area (1C) to black bear baiting. Baiting black bears as a hunting method has been prohibited in the Juneau 1-C subunit for over 30 years, in recognition of the many problems caused by bears becoming accustomed to human food, as well as other conflicts. Juneau has a chronic garbage bear problem at the present time. Attracting bears to bait stations with human food will only add to this problem through food conditioning.

The problem of food conditioning bears through improper garbage handling became so acute that a special Black Bear Committee, was formed in Juneau, consisting of members from ADFG, law enforcement, the local refuse company and citizens. The committee was charged with finding ways to alleviate the problem of bears obtaining garbage and human food. Allowing bear baiting in Juneau would work against the positive measures this committee has achieved.

Given the densely populated Juneau area, with its constricted geography between ocean and mountainside, an earlier Board recognized that Juneau 1-C was not appropriate for this activity. An extensive trail system exists in the City and Borough of Juneau, along with many roads and residences throughout the area. The distance restrictions around dwellings, roads and trails that apply to bear bait stations in present



regulations are insufficient to keep food-conditioned bears from travelling into residential and high use public areas around Juneau.

A Proposal to open the Juneau area to bear baiting has not been made in the nearly 30 years since the prohibition was adopted. I believe that the reason for this is that there is insufficient justification for it.

There are many other opportunities for black bear hunting in the alpine areas surrounding Juneau. Bear baiting is fundamentally inappropriate for our area, and will result in unnecessary conflicts.

Finally, given the urban character of Juneau, and the controversial nature of the hunting method, it would be unfair to the City and its residents to adopt a regulation of this type without the Board or the Department holding a public meeting in Juneau and soliciting more widespread public comment.

Sincerely,

A handwritten signature in black ink that reads "Joel Bennett". The signature is fluid and cursive, with a large initial "J".

Joel Bennett



Submitted By
Kristine Benson
Submitted On
12/26/2018 11:13:52 AM
Affiliation

Phone
907-780-7811
Email
kbenson722@gci.net
Address
145 Behrends Ave
Juneau, Alaska 99801

Dear Board of Game members, Southeast Region: Please do NOT approve Proposal 23 regarding opening a large area that is currently closed to goat bow hunters. There are several concerns about this proposal that warrant you disapproving it. The areas proposed for change include several areas that are accessed by many hikers via well known and maintained trails. Also included are areas where viewing goats is one of the important interest points for people who hike the Nugget Falls trail or come to the Forest Service Visitor Center at the glacier.



Submitted By
Rachel K. Bergartt
Submitted On
12/27/2018 4:19:26 PM
Affiliation
Southeast Alaska Resident

Phone
9079575022
Email
dr.rachel.bergartt@gmail.com
Address
9315 VIEW DRIVE
JUNEAU, Alaska 99801

Dear Alaska Board of Game,

I am writing in support of Proposal 14, "Require trappers to post identification signs for traps and snares in Units 1–5."

Trapping and snaring through the use of unmarked trap lines currently presents an unnecessary risk to humans and dogs. This unnecessary risk is easily mitigated by the requirement of signage as described in Proposal 14. The proposed requirements are similar to those currently required for marking Bear Baiting Stations within Alaska and would pose no undue or unique burden on trappers.

As a user of wildlife resources, it is my firm ethical code that we must all bear responsibility for any danger that our consumptive activity places upon our shared community. Hence, trappers should bear responsibility for the danger that their activity poses to other user groups and mitigate that harm by placing signs within 50 yards of a trap set.

Placement of signs will alert other user groups to the potential danger ahead, allowing community members to choose whether to continue into an area where active traps are present. Posting signs delineating traplines will help to reduce the unintended capture of domestic pets and reduce risk to humans, as many hikers, families with children, and dog-walkers would simply choose to recreate elsewhere than along an active trapline. Additionally, posting of signs may actually increase the trapper's chance of successful harvest, as people may choose to avoid this area for recreation and it is common knowledge that target species for trapping tend to avoid areas heavily scented with humans and domestic canines.

Furthermore, placement of signs demonstrates that trappers are actively trying to reduce conflicts with other public resource users and shows the public that those trappers are engaging in ethical and lawful trapping. This action will go a long way toward building public support for trapping. Additionally, some trappers have voluntarily taken the initiative to use signs to mark trails where they are trapping, and this is a good-will gesture that is much appreciated within our community.

In conclusion, I fully support Proposal 14 and encourage you to do the same.

Respectfully,

Rachel K. Bergartt



Submitted By
Rachel K. Bergartt, D.V.M.
Submitted On
12/27/2018 4:19:35 PM
Affiliation
Southeast Alaska Resident

Phone
9079575022
Email
dr.rachel.bergartt@gmail.com
Address
9315 VIEW DRIVE
JUNEAU, Alaska 99801

Dear Alaska Board of Game,

I am writing in support of Proposal 13, "Require identification tags for traps and snares in Units 1–5."

As a 16-year resident licensed Alaskan hunter and fisher, I am required to identify all harvesting gear left unattended in the field (such as crab pots, shrimp pots, sport use ground tackle, bear baiting stations, etc.) or be personally attending the gear (such as fishing rods or hunting with rifles/shotguns). Trapping should be no exception. Reinstating the language requiring traps to be marked serves several key purposes:

- 1) Marking the traps with identification will keep trapping requirements in line with the rest of harvest activity occurring within Southeast Alaska. Marking is not unduly or uniquely burdensome to trappers, and therefore, trappers should identify their traps as required with all other harvest gear.
- 2) Marking the traps with identification will bolster community trust with trappers. When unmarked traps are encountered by a community member, questions immediately arise as to why active traps are unmarked and raise suspicion of the activity, triggering an immediate distrust. Requiring markings on traps will eliminate the mystery as to why active traps are unlabeled when all other harvesting gear in Southeast is required to be marked.
- 3) Marking traps with identification will aid law enforcement, reduce budget constraints and encourage responsible trapping practice. When a trap is found to be set illegally, currently, law enforcement must spend valuable time talking with ADFG sealing officers to try to piece together who owns the trap and who is known to trap in a particular area, if ownership can even be determined at all. In this time of state budget crisis, paying ADFG sealing officials and law enforcement for work to sleuth out ownership is particularly egregious and can be eliminated with a simple marking requirement. Additionally, people who may be otherwise inclined to trap illegally may think harder about that choice when their name is attached to the gear.

The only people that benefit from not requiring marking of traps is those who trap illegally or irresponsibly. This exemption is only protecting those who put the community at risk, all the while profiting personally from this public resource. Alaskans deserve better. Furbearers are a shared resource, and we must all be held accountable to use public resources in a conscientious manner.

Additionally, if trappers are concerned about the public perception of trapping, I would encourage the Alaska Trappers Association to engage in a concerted public outreach effort to educate the non-trapping community about the ethical standards of trappers and not hide behind the shadows of unmarked traps. Trappers alone can change their image - looser regulations for trapping activities only serve to perpetuate the notion that trappers are irresponsible and unconcerned about the communities they reside in.

In conclusion, I fully support Proposal 13 and encourage the Board of Game to do the same.

Respectfully,

Rachel K. Bergartt



Submitted By
Gretchen Bishop
Submitted On
12/23/2018 9:12:40 PM
Affiliation

Sinc Thanks Dear BOG members: I am writing to oppose BOG proposals number 22, and 28. I am concerned about overharvest of wolves if the limit is removed on Douglas Island. I enjoy deer hunting but also like to watch wolves, as do the tourists in our thriving tourism industry. Furthermore wolves keep their prey populations healthy. I am most concerned, however; about the proposal to permit baiting of black bears in the Juneau area. Juneau has made heroic and largely successful efforts to avoid creating garbage bears. This proposal would greatly hamper these efforts and create many garbage bears, resulting in their eventual demise. This would also embolden these bears and endanger the public. Thanks for the opportunity to comment and for your service on this board. Sincerely, Gretchen Bishop



Submitted By
Arthur Bloom
Submitted On
12/24/2018 4:44:48 PM
Affiliation

PROPOSAL #22 Remove hunting quota on Douglas Island

OPPOSED - Easy road and boat access make it possible to completely eliminate wolves on Douglas Island. Previously the BoG recognized the that some number of wolves have a place in the island ecosystem, and that non-consumptive values should be recognized. I agree with this viewpoint and do want to see the restrictions changed.

Submitted By
Arthur Bloom
Submitted On
12/24/2018 4:53:08 PM
Affiliation

PROPOSAL 23: Allow Archery hunting of Mountain Goats

OPPOSED: This area is better used for viewing of goats. The animals have become accustomed to people because of the many hikers and would be less wary. Archery equipment has become so high tech that archery hunting is only marginally less deadly than rifle hunting, especially with animals that are habituated to people.

Submitted By
Arthur Bloom
Submitted On
12/24/2018 4:59:38 PM
Affiliation

Proposal 28: Allow black bear baiting

OPPOSED: I do not believe this is "fair-chase" hunting.

Juneau has had a chronic black bear/garbage/human food problem and allowing bear baiting in a populated area would only add to the problems.



Submitted By
Joyanne Bloom
Submitted On
12/24/2018 8:08:38 AM
Affiliation

Phone
9077233604
Email
joyanneb@gmail.com
Address
883 Basin Rd
Juneau, Alaska 99801

Regarding proposal 28, I urge you not to support bear baiting in the Juneau area. Although I am opposed to baiting anywhere, I would compromise with allowing it in places over 100 miles from population areas. It doesn't belong in and around Juneau where:

we work hard to keep bears from becoming accostomed to planted food in garbage bins in front of our homes,
where we have dogs accompany us into wilderness areas and
where we value our wildlife for our own viewing and that of our visitors.

Submitted By
Joyanne Bloom
Submitted On
12/24/2018 8:15:31 AM
Affiliation
none

Phone
9077233604
Email
joyanneb@gmail.com
Address
883 Basin Rd
Juneau, Alaska 99801

Regarding proposal 23, I, like much of Juneau live at the base of Mt. Juneau and enjoy goat sightings almost daily in the summer. I love to take visitors up Mt. Juneau and walk the ridge so they can see goats up close. There should be no hunting of any kind along those trails and ridges. It took money, effort and a lot of time to get a goat population back up there for all of us to enjoy. It's even a treat to the thousands of visitors who take the tram up Mt. Roberts to look over and spot goats on the Juneau ridge. Lets not reduce their recovering numbers by even one goat. Hunters need to find a place to go where there are not hikers. The two endeavors are not compatable.

Thank you for your consideration.



Submitted By
Catherine Botelho
Submitted On
12/18/2018 9:30:09 AM
Affiliation

I am concerned about the possible expansion of the local mountain goat bow hunting open area under **Proposal #23**. It is my understanding that all ridges between Mendenhall and Taku Rivers would be open for harvest if this regulation was adopted.

In recent years due to the excitement of ice-cave viewing, the foot and ski traffic around and across Mendenhall lake has markedly increased. In winter, it is extraordinary to view the number of people of all ages crossing the lake on foot, on sleds, and on skis watching for the appearance of mountain goats sunning themselves on the precipitous drops beyond Nugget Falls. There is no other place in Juneau that gives this kind of access to wildlife viewing of mountain goats. In the spring, hikers rise early to hit the West Glacier trail to scramble over the peninsula to get to a viewpoint to specifically find a spot to observe mountain goats before everyone else shows up. Anecdotally, the last few spring and summers, fewer viewing opportunities have occurred for friends that have been making these treks multiple times each year for many years. (Population down, too many people?)

The popularity of hiking up Mt. Juneau is partially the draw of viewing mountain goats as well. It is a very accessible trail (as opposed to Blackerby which is much more challenging). When I entertain out-of-town guests, I always have several pairs of binoculars in my car for spotting mountain goats on Mt. Juneau or the ridge as we travel Basin Road. Alpine areas of Mount Roberts to Sheep Creek and West Peak are increasingly high use hiking trails. The great memories of these treks are the wildlife.

We need to protect these wildlife viewing opportunities for the greater number of people. **Keep the current closures. Please do not change the boundaries of the allowable hunting areas.**



Submitted By
Barry Brokken
Submitted On
10/29/2018 8:25:04 AM
Affiliation
Alaska Trappers Association, Juneau Chapter

Phone
907-635-3334
Email
capitalimp@gci.net
Address
2355 O'Day Dr.
Juneau, Alaska 99801

Proposal 31:

As the author of this proposal, most of my ideas and concerns are listed in the body of proposal #31, however, I would like to provide a little in-sight. Perhaps 10 years ago, the trail restrictions listed in the trapping regulations, (1/4 mile setbacks from certain trails), had no provision for the use of elevated sets placed 50 yards or more from trails. I authored a proposal to allow such trapping, and through the BoG process and discussion with the BoG members, we crafted the current regulation.

It has been very successful in allowing younger trappers to participate in marten and ermine trapping, and has had little to no negative effects to other trail users. I would like to apply similar rules and requirements to submerged sets, to allow opportunity for water-oriented furbearers, (though a 5" jawsread might preclude the trapping of otter and beaver, which would run counter to the end-goal of this proposal).

Southeast in general, and Juneau/unit 1C in particular, has a very high population of such furbearers, (i.e. mink, otter, and beaver), but under current regulation, the resource is nearly off-limits to trappers wishing to trap along the road system.

Many of our younger trappers simply don't own or have access to watercraft to trap outlying islands or large river systems, and the current lack of opportunity to pursue the more common furbearers in this area is having a negative effect in recruiting and keeping new trappers interested in the activity.

As you know, the ATA actively tries to recruit and teach new trappers, stressing ethics, responsibility, humane practices, and public out-reach. This proposal would aid in such endeavours.

Thank you,

Sincerely, Barry Brokken.



Submitted By
Odin Brudie
Submitted On
12/27/2018 11:03:24 AM
Affiliation

Phone
907-209-4344

Email
odin@gci.net

Address
512 6th St
Juneau, Alaska 99801

Re: SE Board of Game Meeting Jan 11-15 in Petersburg

Dear Game Board Members,

Regarding Proposal 22 - Remove (Wolf) Hunting Quotas on Douglas Island.

I OPPOSE this proposal. Like a MAJORITY of the backcountry users of Douglas Island, I primarily use the island for NON-HUNTING Recreation, mostly skiing and hiking. **I occasionally hunt on the island.** We are very happy to see and hear the return of wolves to the island. A dozen years ago, wolves had been exterminated from the island by one or two trappers. This must not happen again. Wolves are an essential part of a wild, healthy, and diverse animal population here in Juneau.

Regarding Proposal 23 - Bow Hunting quota for Mountain Goats in the Front-Country area of Juneau.

I strongly oppose the hunting of goats in this area. Mt. Juneau is among our biggest attractions for hikers, both resident and visitors. Seeing Mountain Goats are the HOLY GRAIL for a trip up the Mt. Juneau ridge. Some years, there are precious few goats, some years your chances are good of seeing them. When they are present in good numbers, hikers are in VERY CLOSE PROXIMITY to the goats. Allowing any hunting of goats on the Mt. Juneau Ridge would be irresponsible, unsafe, and a bad precedent.

Thank you for considering my perspective, which I share with many of my Juneau compatriots.

Sincerely,

Odin Brudie
512 6th St.
Juneau, AK 99801
odin@gci.net



From: Richard Caulfield
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: BOG comment: Hunting proposal #22--Hunting wolves on Douglas Island
Date: Wednesday, December 26, 2018 10:28:38 AM

Dear Board of Game:

I've been an avid hunter for all of my 44 years in Alaska. I'm opposed to changing the regulation about hunting quotas for wolves on Douglas Island. There currently are opportunities for hunting and trapping wolves on Douglas, but there needs to be a balance that avoids over harvest. Keeping the current quotas in place is a way to do that. I oppose proposal #22 that seeks to do so, and I urge you to reject that proposal.

Thank you.

Rick Caulfield

--

Rick Caulfield
15205 Point Louisa Road
Juneau, AK 99801

caulfield99801@gmail.com



From: Richard Caulfield
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: BOG comment: proposal #23
Date: Wednesday, December 26, 2018 10:34:59 AM

Dear Board of Game:

I've been an avid hunter in Alaska since I first came here 44 years ago--moose, caribou, deer, bear, and small game.

I oppose proposal #23 about expanded archery hunting of mountain goats near Juneau because there are already

such opportunities and there is a need to balance interests of hunters with non-consumptive uses/viewing of mountain

goats in these often-visited areas. I'm also concerned about safety for many residents and visitors hiking trails near

Juneau when often-times ill-trained bow hunters are seeking to take goats. There are other opportunities for archery

hunting that are located away from these highly-used areas. I oppose proposal #23 and ask you to reject it.

Thank you.

Rick Caulfield

--

Rick Caulfield
15205 Point Louisa Road
Juneau, AK 99801

caulfield99801@gmail.com



From: Richard Caulfield
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: BOG comment: Bear baiting in 1-C (#28)
Date: Wednesday, December 26, 2018 10:43:09 AM

Dear Board of Game:

I've hunted every year of my 44 years in Alaska--moose, caribou, bear, deer, and small game. I've never understood why Alaskans, who have access to such amazing opportunities for fair chase hunting, have to resort to bear baiting. It may be done commonly elsewhere, but it makes no sense here--and especially in areas where we struggle to keep bears from becoming habituated to human food. I've had bears walking through my yard here in Juneau, but thankfully they didn't find food. I don't think it's smart to encourage bears to seek out bait stations when we're trying to avoid bear-human interactions in populated areas. There are plenty of other opportunities for hunters to take a bear without using this practice. I've used those opportunities, and so can they. Please reject proposal #28.

Thank you.

Rick Caulfield

--

Rick Caulfield
15205 Point Louisa Road
Juneau, AK 99801

caulfield99801@gmail.com



Submitted By
Daniel Coleman
Submitted On
12/28/2018 3:42:26 PM
Affiliation

Phone
9074190270
Email
dan@colemans.me
Address
10103 Silver Street
Juneau, Alaska 99801

Dear Board of Game,

I'm writing in opposition of PROPOSAL 19 5 AAC 92.510(6). Areas closed to hunting. Road systems that have access to hunting grounds are few and far between in our area. The public lands that Hecla is proposing to restrict access to are our lands, not mining property. It is not right for them to deny the access of myself, my family, or friends to public lands that should be safely regulated to allow harvesting of game. For years there have been few incidents and no loss of life. We need to try regulation and enforcement of safe hunting practices before limiting access to all hunters. Don't let a few rotten apples ruin the public's access to a valuable road system that puts food on the table of many families.

If Hecla is truly concerned about the safety of their employees I think they should look at incidents of mine and bear safety which have caused more fatalities than hunting.

Sincerely,

Dan Coleman



Submitted By
Brett Collins
Submitted On
12/28/2018 12:36:55 PM
Affiliation

Phone
7185819565
Email
brett.col@gmail.com
Address
1024 Wee Burn Drive
Juneau, Alaska 99801

I'm a hunter, a Juneau resident who lives on North Douglas and a tour guide in the region. I strongly object to proposal's 22, 23, and 28.

Proposal 22. The reality is that little is actually known about the wolf pack on Douglas Island. Data collected is anecdotal, and often reported in by hunters and trappers. Making a decision based on anecdotal data goes against scientific reasoning. Maybe instead of blaming wolves we should look at how it's managed in terms of tags given out. Yes wolves take deer, but so do the many hunters with the easy access that the trails in Douglas provide. While I have heard wolves, and seen sign, I'm yet to see a wolf on Douglas Island. I'd be stoked to see one in the wild, as would many of my friends, both hunters and non-hunters. They also belong here, were here before humans, and what right do we have to control their population just so we can go shoot more deer?

23 The mountain goat population around Juneau is a unique feature to have here. I get to fly with tourists as part of my summer job, and it's a lot of fun pointing goats out to them. I also enjoy being able to go up to the ridges in my own time, and like the fact I may be able to see mountain goats, and get relatively close to them. If it gets opened up to hunting again, considering how easy it is to get up to the ridges in Juneau, the population will dwindle quickly (and people will most likely start blaming wolves!!), and many will miss the awesome opportunity to see these beautiful animals in the wild.

28 Bear baiting in Juneau seems like a terrible idea. We already have a problem with bears being attracted to human food, it doesn't seem prudent to let people bait traps nearer a built up population. I know it's accepted in other parts of Alaska, but perhaps that should also be looked at!

Cheers, Brett Collins



Submitted By
Judy Crondahl
Submitted On
12/23/2018 7:29:01 PM
Affiliation
Resident

Phone
907-586-1464
Email
Crondahl@gmail.com

Address
800 F Street, A-4
Juneau, Alaska 99801

Proposal #22: I am opposed to removing limits on hunting of wolves on Douglas Island. This could decimate an entire population and harm the diversity of the island's ecosystem.

Proposal #23: I am opposed to instituting an archery hunt of mountain goats on Mt. Juneau and Mt. Roberts. I remember when the goats were brought in and since then it has provided a wonderful viewing opportunity for both residents and visitors. The telescopes on the waterfront provide a real thrill when tourists and locals can get a good view of goats.

Proposal #28: I am opposed to bear baiting. This is against everything the city has been trying to do to cut down on the garbage bear problem in the area.



Submitted By
Hanna Davos
Submitted On
12/28/2018 9:37:21 AM
Affiliation

As a lifelong resident of southeast I find it odd that proposal 19 is submitted under the Sitka region instead of Juneau. I am not in favor of Hecla Greens Creek Mine proposing shutting down 1/4 mile swaths of land to hunting. Greens Creek Mine has a safety procedure in place that has served them very well for the past 30 years, with the exception of the incident this summer they have a stellar safety record. i see no need for further encroachment on land that is being leased to them.



December 27, 2018

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

Re: Comments for the 2019 Region 1 BOG Meeting

Thank you for the opportunity to submit written comments relating to the proposals for the Petersburg Board of Game meeting, January 11-15, 2019.

My wife and I have lived in Sitka for the past 45 years. Our 3 children were born and raised in Sitka and all 3 continue to reside and work in Alaska. I have worked as a hunting guide in SE Alaska since 1985 and currently hold a Master Guide license.

Proposal 3

I am opposed to this proposal. I believe that meat salvage requirements for Sitka blacktail deer should be the same as for other big game species that are hunted for food. Although there is not a great deal of meat on the ribs, the rib meat is good quality and not difficult to salvage.

Proposal 4

I am opposed to this proposal. I believe it encourages unethical hunting practices. Allowing hunters to shoot at big game from a boat will result in unnecessary wounding of game animals for two reasons. First, a boat is not a stable shooting platform due to wave action and makes target acquisition more difficult. Second, game animals on a beach often spot the approaching boat at a distance and this, in combination with rocky underwater approaches to many beaches, results in shots being taken at excessive ranges.

The other ethical issue here is that hunters shooting from a boat may not attempt to go ashore and search for the animal if it does not show obvious signs of a hit, and runs off, particularly if the weather is poor and breaking waves on the beach. Wounded animals, even those that are mortally wounded, do not always show obvious signs of being hit before running into cover; this is particularly true of brown bears and black bears. Failing to follow up animals shot from a boat is almost certainly going to happen if this proposal is passed.



Proposal 7

I am opposed to this proposal. SE black bears are a very important and highly sought after big game resource. These bears are regarded as some of the biggest black bears in North America. Eliminating the sealing requirement for a portion of the black bears harvested will result in the loss of valuable information that is needed to make management decisions.

Proposal 8

I am opposed to this proposal. The basis for the proposal is in error. There is no guide requirement for non-resident black bear hunters in SE Alaska. The drawing requirement for unguided nonresident black bear hunters was put into place at the November 2010 Region 1 BOG meeting because prior to this time there was no way to control the unguided nonresident black bear hunting effort in SE. The guided nonresident hunting effort was found to be already effectively controlled through the Forest Service's special use permitting system. However, the 2010 BOG meeting did not establish a requirement for nonresident black bear hunters to hire a guide, nor has there ever been such a requirement.

Proposal 9

I am very cautiously in support of this proposal. The black bear drawing permit hunts in 1B, 1C, and 1D are undersubscribed each year. Also, there are no resource concerns for the black bear populations in these management areas. When the black bear drawing system was established in 2010, there was not an overharvest issue in 1B, 1C, or 1D either; but instead, a concern that if the drawing requirement was just put into place in GMU 2 and GMU3, nonresident hunting effort would move to GMU 1. Since this did not happen, it is reasonable to conclude that a drawing in these management areas is not needed.

However, the non-resident draw system for black bear in SE also resulted in a major reduction in the illegal guiding taking place on transporter vessels since these operators could no longer pre-book large numbers of non-resident hunters. A walk around any one of the hunting/fishing trade shows will confirm that this problem of illegal guiding is still common in areas like Prince William Sound and Kodiak, but is now much less common in SE Alaska. I am concerned that eliminating the draw for unguided nonresident black bear hunters in GMU 1 will allow a foothold for this practice to get reestablished in SE. If this happens, the impact will be felt not only in GMU 1 but in GMU 2&3 as well, due to their close proximity to GMU 1. If the draw will no longer apply to GMU 1, a system should be put in place to closely monitor the transporter activity in the area along with a plan to effectively respond to any significant increase in this activity.

Proposal 49/50

I am opposed to these proposals, as written. When the 2010 black bear draw was established, hunting guides entered into a handshake agreement with the Department of Fish & Game to self-limit their black bear hunting effort to maintain guided harvest at 2007-2009 levels. In general, this meant that each guide would take fewer black bear hunters than allowed by their Forest Service special use permit allocation. Guides have held to this agreement, even though in some cases this has resulted in a permanent reduction in black



bear allocation. The Forest Service “use it or lose it” policy is that if an allocation is not fully used over the course of 5 years, the allocation will be reduced to a lower number because of the non-use. This happened to me a couple of years ago and no doubt happened to other guides, as well.

If the Department feels that the resource can handle additional hunting effort, consideration should be given first to the guided nonresident component because of the reductions that occurred through the handshake agreement.

In addition, the 2010 draw did not anticipate any negative impacts on resident hunters. In fact, in discussions about the drawing system it was an important consideration that resident hunters not be negatively affected. Since that time it has become apparent that some resident black bear hunters have been adversely impacted through the second degree of kindred draw requirement. I would support eliminating the drawing requirement for second degree of kindred nonresident black bear hunters. These hunters would still be required to obtain a registration permit in order to monitor this component of the black bear hunting effort.

Proposal 51/52

I support these proposals. The shorter harvest reporting and sealing requirements for Kuiu Island were put in place years ago when the transporter activity on Kuiu was much higher than it is currently. As I mentioned earlier, the unguided nonresident draw system has significantly reduced this component of the black bear hunting effort. This change, along with a number of enforcement actions against transporters in the region, has helped control black bear harvest on Kuiu Island (and elsewhere) to a level where the shorter reporting and sealing are no longer necessary.

Thank you for the opportunity to comment on these proposals.

Sincerely,

Brad Dennison
Master Guide
Sitka



Submitted By
Chris Done
Submitted On
12/28/2018 12:25:39 PM
Affiliation

Phone
9077890568
Email
donek@gci.net
Address
PO Box 20624
Juneau, Alaska 99802

I strongly support both Proposal #13 and #14. Trap lines, traps, and snare need to be marked / identified because trappers are not the only users of the lands where traps are set. Other users need to be aware of the trap so they can avoid them. Other consumptive users of fish and wildlife are required to identify and take ownership of their gear. Trappers should also.



Submitted By
Ritchie Dorrier
Submitted On
12/27/2018 10:50:42 AM
Affiliation

Phone
907-321-1542
Email
ritchiesonner@gci.net
Address
15255 Point Louisa Rd
Juneau, Alaska 99801

Regarding Proposal #28, compelling the Department to issue black bear baiting permits, I see no sense in this proposal. While I realize this practice may be allowed in other unique areas of the state, it is my opinion the bears are already tempted by human food and waste, and bear baiting would potentially exacerbate the situation. And as a hunter, I feel baiting bears is not in alignment with the ethics of fair chase hunting. Thank you for your consideration of my opposition to Proposal #28.



Submitted By
Danielle L Duncan
Submitted On
12/24/2018 10:28:02 AM
Affiliation

Phone
9074657576
Email
daniellelynn78@gmail.com

Address
3264 MENDENHALL LOOP RD #19,
19
JUNEAU, Alaska 99801

This comment is in regards to PROPOSAL : #22, REMOVE HUNTING QUOTA ON DOUGLAS ISLAND WOLVES: I disagree with the proposal because a three wolf harvest is plenty for Douglas Island and if we harvested more, it would not lead to having more deer, as other wolves would come into the territory. There are more than enough deer around southeast and no need to cull wolves who perform essential ecosystem duties and are just as important as deer. Thanks for your consideration.

Submitted By
Danielle L Duncan
Submitted On
12/24/2018 10:34:56 AM
Affiliation

Phone
9074657576
Email
daniellelynn78@gmail.com

Address
3264 MENDENHALL LOOP RD #19,
19
JUNEAU, Alaska 99801

This is in regards to PROPOSAL #23: ALLOW ARCHERY HUNTING OF MOUNTAIN GOATS ON MT JUNEAU AND NEARBY AREAS. I am firmly against this proposal because there are more than enough mountain goats to be harvested outside of the greater Juneau area. The goats are more valuable for tourism than in a few people's stomachs. The idea that someone would be using a bow and arrow in an area heavily used by recreational hikers and their dogs is unreasonable and dangerous. There had been no hunting of the goats on Mt. Juneau for a long time and I'd like to keep it that way.

This area is better used for viewing and non consumptive enjoyment of goats without the pressure and mortality from hunting. There are alternative hunting opportunities in the more remote parts of the Juneau area to accommodate goat hunters—the mountains and drainages northland west of Mendenhall river are open, for example, and accessible from the road system. The value of goats for viewing for our local population and summer visitors is obvious.

Thanks for your consideration~

Submitted By
Danielle L Duncan
Submitted On
12/24/2018 11:53:02 AM
Affiliation

Phone
9074657576
Email
daniellelynn78@gmail.com

Address
3264 MENDENHALL LOOP RD #19,
19
JUNEAU, Alaska 99801

This comment is in regards to PROPOSAL #28: ALLOW BEAR BAITING IN JUNEAU. I am firmly against this proposal both on moral and safety grounds. Bear baiting is an unfair and inhumane hunting practice that should never be allowed in the Juneau area. It is also dangerous to attract bears when there are many people in the area hiking, etc. I find it appalling to even propose bear baiting in southeast Alaska. Thanks~



Submitted By
Luke Fanning
Submitted On
12/27/2018 8:39:10 PM
Affiliation

I am writing in SUPPORT of proposal #22, which would eliminate the Douglas Island Management Area. Effectively, this would end the 3-wolf annual limit on Douglas Island, and Douglas would be managed under the same plan as the remainder of unit 1C.

I am an avid hunter who lives on Douglas Island. I have hiked and hunted extensively for over 20 years. In recent years, the wolf population on Douglas has increased substantially, and wolf predation is adversely impacting the deer herd. In addition to wolf sightings, we're finding multiple wolf kills in the spring while grouse hunting, and there is more wolf sign on the island than I've ever seen before. In some areas of the island that typically hold large numbers of deer, deer sign has been very sparse, yet there is a high amount of wolf sign—it appears the deer are under a lot of pressure from the wolves. We are also seeing wolves on the beach while fishing during the summer, and the wolf population seems to have grown substantially. The department has already shared in their comments that they have heard numerous similar reports.

While the deer population in neighboring areas is doing very well after several successive mild winters, the Douglas Island deer are not. ADF&G is now seeking to limit the taking of does on the island, citing concern over wolf predation as a driving factor.

The bottom line is that the Douglas Island Management Area is no longer reasonable given the growth in the wolf population and the adverse impact to the deer herd. Proposal #22 should be approved so that the department can manage the Douglas Island wolves consistently with the remainder of area 1C.

Sincerely,

Luke Fanning
Douglas Island, Alaska

Submitted By
Luke Fanning
Submitted On
12/27/2018 8:58:23 PM
Affiliation

I am writing in SUPPORT of proposal #16. Prior 2008, the waterfowl season in SE Alaska ran from September 1 – December 16. This gave hunters the most opportunity to focus on migratory birds. When the season start date was delayed by two weeks in 2008, it effectively triggered a loss of opportunity in the peak season when the early migrating flocks (particularly wigeon, pintail, teal and migrating mallards) are harvested. Once those birds are gone, all opportunity to hunt them is lost.

The bottom line is that the season start date should be brought back to September 1st in order to maximize hunting opportunity during the peak season.

Sincerely,

Luke Fanning



Submitted By
Luke Fanning
Submitted On
12/27/2018 9:05:34 PM
Affiliation

I am writing to OPPOSE proposal #15, which would result in a dramatic loss of hunting opportunity during the early weeks of the waterfowl season in SE Alaska, when the migrating birds are coming through SE Alaska. The proposal seeks a later end to the season in order to increase late-season hunting days primarily for targeting of sea ducks and resident mallards. In many areas of SE Alaska, the other birds (teal, wigeon, pintails, etc) are all gone by then, so this proposal would increase opportunity for some hunters, at the expense of peak season hunting opportunity for the majority during the peak of the migration.

Please do not approve this proposal. Sincerely,

Luke Fanning



Submitted By
Laurie Ferguson Craig
Submitted On
12/27/2018 7:56:40 AM
Affiliation
none

Phone
907-789-2768
Email
lauriecraig@gmail.com
Address
PO Box 33306
Juneau, Alaska 99803

I oppose Proposal #22 regarding wolf trapping and hunting on Douglas Island. I am a longtime Juneau resident (49 years) and I recall the uproar over the extermination of the Douglas wolf pack by one trapper many years ago. Our wildlife approaches have changed over the years to strongly favor non-consumptive uses. We appreciate the value of predators in the balance of nature in Alaska which represents one of the few remaining American places where wildlife can be viewed in a truly natural setting. I oppose the removal of the current regulation.

Submitted By
Laurie Ferguson Craig
Submitted On
12/27/2018 8:15:54 AM
Affiliation
none

Phone
907-789-2768
Email
lauriecraig@gmail.com
Address
PO Box 33306
Juneau, Alaska 99803

I oppose Proposal #23 regarding opening certain areas around Juneau to archery hunting of mountain goats. Within this area are very popular mountain goat viewing sites. Mt Bullard, adjacent to Mendenhall Glacier and within sight of the visitor center and its more than half million visitors, is home to a population that are viewable year round by half a million viewers. Hunting activity is easily viewed from the center's windows and, in particular, when wildlife watchers use the spotting scopes provided by the Forest Service. As testimony to this phenomenon of easy visibility, one day from inside the visitor center we watched a mother bear kill the first baby goat born on the mountain. It was a National Geographic moment that distressed some visitors and children. I would not want to observe a hunter do the same thing in front of visitors, or carry a carcass through the parking lot. I am a retired naturalist with 14 years' experience serving guests at the Mendenhall Glacier Visitor Center. The watchable wildlife value of these animals far exceeds the value of a consumptive user who has alternative places to harvest a goat. The same appreciation of wild goat viewing applies to Mt Juneau. The opportunity to teach and learn about wild animals in their natural setting far outweigh the taking of these animals by bow or other hunters. Additionally, local hikers are using more trails with access to high country where mountain goats are commonly seen. In keeping with greater ideals of outdoor fitness and health, we would not want to endanger the public or negatively impact their hiking experiences. For these reasons I object to Proposal #23.



Submitted By
Laurie Ferguson Craig
Submitted On
12/27/2018 8:25:18 AM
Affiliation
none

Phone
907-789-2768

Email
lauriecraig@gmail.com

Address
PO Box 33306
Juneau, Alaska 99803

I strongly oppose Proposal #28 which would allow bear baiting. As a long time Juneau resident (since 1969) I have observed bears and the public's attitude about them shift significantly from fear to tolerance and appreciation. Allowing bait stations would undermine and contradict these new attitudes of co-existence. Baiting bears directly conflicts with public education efforts to control human food attraction for bears. One high-profile case in Juneau convicted a person for feeding bears. The bears' behavior, when the feeding was discontinued, negatively affected many other residents' potential safety when the bears sought human food on neighboring properties. Bears learn very quickly that human food sources are easy and accessible. Trash control continues to be a problem in Juneau. We want to keep people safe and bears wild, and preventing food conditioned bears is essential to that effort. Reject Proposal #28 about bear baiting, please.



Dear Ted and Nate,

During a recent HCC meeting, the SE BOG schedule and GMU 2 proposals came up. This letter is a result of that discussion from me, not the HCC. However, please note that there have been no opinions expressed from within the HCC differing from what I am about to present other than deer allocation which has not been discussed.

As you both know, the 1989 and 1991 anti-wolf harvest ballot initiatives hit our state hard relative to maintaining healthy, sustainable wildlife populations. From my world, the impact on the Upper Kuskokwim, Alaska Range as a whole, Talkeetna's, Wrangell's and the Chugach were hit hard with subsequent depressed ungulate populations, many of which have never fully recovered. For those of us who have keen observation ability and who spend significant time in the woods, this situation was emphasized by significant increases in wolf populations easily seen by actual sightings, tracks, dens and reduced rodent and ungulate populations.

Please note that this is exactly where POW is currently. Nearly every one of my employees who hunt, camp or spend regular time in the field have seen significant increase in the POW wolf population. Even to the point that many hunters are seeing wolves in packs, pairs or individuals in nearly every outing. They are not seeing deer and very few have the harvest they would like to have to provide the food they are used to for their families. This is not a Hollis local reflection. It is an Island wide reflection.

Note that I have seen as many live wolves while living here in this rain forest environment for going on two years as I have seen in the past 35 years total. Every game trail in every preferred deer habitat has something in common currently; "heavy wolf sign". Also, please note that I have not see a deer in over a month but wolf howling's and sightings are common.

One of my employees who spends as much time as possible with his wife and children out hiking, hunting, fishing, camping, wood cutting etc. had three different instances this past summer and fall where packs of wolves negatively impacted their excursions by surrounding them in the woods, howling, barking etc., in my mind to lure their dogs away from them. Each of these incidents were in differing locals. One of my geologists while doing surface recon just above the mine had wolves run up and bark at him in the forest. Calling deer here is a common hunting practice. Calling deer here now has just as much chance of luring wolves as it does deer.



The following are my reflections and suggestions for your consideration. The only reason you are receiving this letter is that there is a problem here and without affirmative action, it will not get better by itself. Please note that I am not actively hunting here on POW. Have brought my good Wildlife Technologies call down to try and harvest a wolf or two but each year the wolf season is closed by emergency order before I have a chance to get out and enjoy trying.

1. As much as I want to believe in the DNA based wolf population density/extrapolation estimates, there has to be failure in that process somewhere. There are too many wolves for it to be correct. If it were me, I would go back to the lady who developed the DNA identification process used here, confer carefully with her, and carefully review every part of the population extrapolation aspect from the beginning to learn where the failure has occurred. My personal thoughts are that the DNA work may be valid where it occurs, but using it for island wide extrapolation is not effective. I know that certain AB's would differ on this comment but I am not at all comfortable with the density estimation.
2. Here we are yet once again with hunters dividing into various user groups all competing for what is left of declining ungulates. This is a statement in itself for POW where the recent winters have been mild and the habitat is prime for ungulates, and the hunter effort is not growing.
3. The illegal harvest/unreported wolf harvest works against everyone's best interest and those involved need to be fully prosecuted. However, the citizens who resort to this activity statewide in most cases have one thing in common: "the management system is not working".
4. For the past three years, the wolf harvest objective has been met within a few weeks or even days of the season opening. This itself should shed some light on the situation.
5. There should be no doe harvest allowed until things turn around.
6. There could be a reduction in deer harvest opportunity say from four deer to three for the next BOG cycle or something similar to help support the following recommendation.
7. I would look seriously at increasing the wolf harvest objective by 2 to 3 times for the next BOG cycle. Then reconciling encouraged predator and prey science and inventory data to help



8. To the amount you feel comfortable with, consider conferring these types of actions for support from the FSB during the BOG meeting to help bring various user groups together.

9. Please consider that prior to the 1989 and 1991 ballot initiatives we had a one brown/grizzly bear harvest limit every four years nearly statewide. This was because we had healthy and, in many cases, growing numbers of ungulates. Once the result of the ballot initiatives surfaced and the ungulate populations were dropping rapidly, the level of bears became a concern on what was left of the ungulates. Thus, the need to harvest more bears.

10. The BOG actions taken over the past recent years regarding black bear conservation and harvest on POW have worked, but have probably contributed to an increased number of black bears. You should look carefully at where you can increase some additional harvest opportunity without spiraling back to where the situation was six or seven years ago.

11. There is opportunity for you to consider the above within several of the SE GMU 2 proposals, especially the ADF&G proposal #43 which I believe was well written.

Regardless of the above, wishing you both the Very Best and Thanking You for your Significant Commitments to the State and our Wildlife.

As Always,
Bobby Fithian



Submitted By
Anne Fuller
Submitted On
12/26/2018 12:02:13 PM
Affiliation

Phone
(907)586-4422

Email
fernleafgt@yahoo.com

Address
7943 N Douglas Hwy
Juneau, Alaska 99801

I am writing in opposition to proposal 28 to Issue permits for using bait or scent lures to hunt black bear in Unit 1C Douglas Island is a place where I walk, cycle, hike, and paddle. I use trails and I cross meadows in lots of different conditions. Sometimes I see creatures, more often I see sign.

We don't need bait stations. Hunting can be properly regulated to be safely and efficiently conducted on the island. The prohibition of bear baiting makes sense on this island with all the houses, streets, trails, and roads. The bears should be rambling and finding food on their own.



Submitted By
Jeanette Gann
Submitted On
12/10/2018 10:57:55 AM
Affiliation

I would like to voice my support for PROPOSAL 13 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions. Require identification tags for traps and snares in Units 1–5.

If it's required that all crab pots must have contact information associated with them, it stands to reason that traps on land should do the same, especially if unintended game and /or pets become ensnared in said traps, which they often do.

Thank you for the opportunity to comment.

Jeanette Gann



JOSEPH W. GELDHOF

Attorney at Law

2 Marine Way, Suite # 207
Juneau, Alaska 99801
(907) 723-9901 [Mobile]
Mobile: (907) 723-9901
E-mail: joeg@alaskan.com

VIA HAND DELIVERY

December 26, 2018

Alaska Department of Fish & Game
Board Support Section
Post Office Box 115526
Juneau, Alaska 99811

Re: Alaska Board of Game Proposals # 22, 23 & 28

Members of the Game Board:

I am writing with regard to the above-referenced proposals, all of which will have an obvious impact on wildlife resources in Unit 1-C. As a resident of Juneau, I am concerned the proposals are inconsistent with balanced resource management and detached from actual biological considerations.

PROPOSAL # 22

This proposal would remove the current limit on harvesting wolves on Douglas Island by eliminating the Douglas Island Management Area in GMU 1-C. At present, the Douglas Island Management Area limits the annual wolf harvest quota for the island to three wolves. This limit was set up years ago by the Game Board based on the recognition that wolves had a place on the Douglas Island. Putting a quota on the harvest of wolves on Douglas Island makes sense in order to guard against over harvest of wolves, something that can readily occur because access to areas used by wolves on Douglas Island by road and skiff is easy.

Douglas Island should have some wolves. Not only does a wolf population afford non-consumptive users of our wildlife with an opportunity to see wolves, having at least a small population of wolves on Douglas Island probably keeps coyotes and feral dog populations in check. Remove the wolves and you risk creating a problem with coyotes and dogs running deer or otherwise stressing deer populations in an un-intended and inefficient manner.



I am also concerned the proposal here isn't really based on actual field work or some sort of biological reality. There is no obvious justification for removing the quota on wolf harvest for Douglas Island. Instead, this proposal appears to me to be sort of an *ad hoc* reaction to the fact that the wolves exist and perhaps that deer population on Douglas Island are lower. Absent genuine findings by department biologists that demonstrate the wolf population is obviously excessive and detrimentally impacting deer population and the overall biological well being of Douglas Island, the Board of Game should pass on adopting this proposal.

PROPOSAL # 23

This proposal would open up Mount Juneau and Mount Roberts, and the entire Juneau area from Mendenhall River to Taku River to archery-only mountain goat hunting with some exceptions for the taking of nannies with kids, would be prohibited August 1-Nov 30). Most of this area is presently closed to hunting except for an area around Blackerby Ridge.

I have bow hunted in New York and Michigan and have some apprehension as to the difficulty of hunting by this method. Frankly, even if one could get a clear shot on a goat in the typically rugged and steep inhabited by goats, the likelihood that the goat might run following being shot for a bit and wind up falling hundreds of yards into a remote and difficult to access place is high.

It is also worth considering that the now established resident population of goats in the Mount Juneau and Mount Roberts area was established in the 1980's. The original population of goats in close proximity to Juneau was re-established through the hard work of local residents in coordination with the Department of Fish & Game. The reintroduction of the goat population is an obvious success story and the goats are frequently viewed by Alaska residents and tourists because the goats reside in close proximity to the Juneau road and trail system. From a pure economic perspective, maintaining a viable population of goats on Mt. Juneau that are not hunted and accordingly relatively placid and viewable is smart.

It may make sense for the Game Board to open areas outside of the Mt. Juneau and Mt. Roberts area for goat hunting using bows but any move to allow hunting of goats in an area where they are obviously enjoyed by tourists and locals is exactly the kind of change in the status quo that accelerates dismay about hunting. Modify this overly broad proposal to protect all goats in the Mt. Juneau and Mt. Roberts area.



PROPOSAL # 28

This proposal would open the Juneau area (1C) to black bear baiting at bait stations. This proposal is a dumb idea and deserves to die.

Baiting black bears as a hunting method has been prohibited in the Juneau Game subunit for over 20 years, in part because baiting bears accelerates problems with bears. A baited bear easily converts to a garbage bear and increases the likelihood of a bad human/bear interaction.

I am not advocating for a restriction on hunting black bears in Juneau but the use of bait stations goes against my sense of proper hunting ethics and the historic tradition of hunting by fair chase. Alaskan is not the kind of place where hunters should or need to bait our wildlife in order to harvest a bear or any other species. Bear baiting is a despicable practice and no competent or self-respecting hunter would willingly acknowledge they harvested an animal habituated to bait. Please pass on this proposal that has no basis in biological necessity, proper game management or according to hunting ethics.

Very Truly Yours,

A handwritten signature in black ink, appearing to read "Joe Geldhof", written over a large, faint circular stamp.

Joseph W. Geldhof



From: Catherine Goulait
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Proposed regulation changes Juneau area
Date: Monday, December 24, 2018 2:14:34 AM

To the Board:

My name is Catherine Goulait.

My residence is 5175 Thane Road, Juneau, Alaska, 99801.

My reason writing to you concerns Proposals #22, #23 and #28. I have lived in Juneau for thirty-four years and value the unique environment we have here. Therefore I am opposed to the aforementioned proposals which would change regulations in the Juneau area that have proved efficacious to our special circumstances and our geography. Because of this geography we live in close proximity to our wildlife areas. We have many summer visitors as well as residents who appreciate the unique opportunity of viewing wildlife in their natural habitat with ease. Our commercial establishments benefit greatly from the ability to offer this accessibility to visitors and residents alike.

As to proposal #22 which is the removal of the hunting quota of three wolves a year on Douglas Island the Game Board recognized years ago that wolves had a place on the island in reasonable numbers. The community has an interest in being able to enjoy wildlife sightings and interactions. It has been proven in the past that it is all too easy because of access and road systems on the island to over harvest. This can eliminate viewing and photography opportunities and cause disharmony in the community.

As to proposal #23 archery hunting of mountain goats, the entire area of Juneau had been over hunted and a population had to be reestablished in the early 1980's. Again, visitors to the tram, the visitor's center at Mendenhall Glacier, and the many hiking trails of Juneau enjoy the ability to view these magnificent goats in their natural habitat. As I understand there is already designated area for hunting west of the Mendenhall Glacier. Let us save the areas we live in for viewing and appreciation in non consumptive ways.

As to proposal #28 to allow bear baiting in Juneau. We already live in such close proximity to wildlife that acclimating them to human food sources could quickly become a detriment and nuisance to the citizens of this city. We are very careful with trash and it's disposal here as it is recognized that otherwise problems arise with acclimated bears. Also in the summer we have many visitors who hike the Juneau trails. If the bears come to associate humans with foodstuffs it endangers the human population. This is not even to address the issue of fair hunting practices which should be considered.

Thank you for consideration of the concerns of a long-time resident who loves her community and all the wildlife it encompasses.

Catherine Goulait



Submitted By
Susi Gregg Fowler
Submitted On
12/27/2018 10:21:51 AM
Affiliation

Dear Members of the Board of Game:

I recently heard about Proposal #23, allowing archery hunting of mountain goats on Mt. Juneau and nearby areas. I am a lifelong Juneau area resident. I grew up fishing, hiking and hunting here. And yes, I hunted on Mt. Juneau. In the early 60's it was a great spot for ptarmigan. By the time I was in college, though, I had stopped hunting on Mt. Juneau as had my dad, an avid sport hunter. But Juneau's population had grown. It was still much smaller than it is now, but the change in population seemed to warrant a change in our behavior.

Proposal #23 opens a huge area to bow hunting, and much of that area is currently extensively used for non-hunting activity—and, I believe, for uses that are not compatible with allowing archery hunting. My husband and I regularly watch the mountain goats, both from our home and from the trail. We've shared our binoculars with visitors from tour ships walking along Basin Road. They're ecstatic at the sight of these grand creatures. Our grandson frequents the Mt. Juneau trail and ridges with friends and running team. Our daughter has taken both our grandchildren camping along the ridge where they have experienced incredible, thrilling goat sightings (being mindful of the fact that these are wild creatures). Allowing bow hunting seems an unnecessary risk both in terms of public safety and the risk of losing a very special natural resource.

I ask you not to implement Proposal #23.

I don't understand the purpose of Proposal #23, bear baiting in the Juneau area. Those who have spent time in Juneau know that bears habituated to human food are an ongoing problem for us, a problem that has gotten much worse with our increased population. I can't see any positive benefit to this proposal, particularly given the population density of our community. **I hope you will not implement Proposal #28.**

Regarding Proposal #22, removing a hunting quota on Douglas Island wolves, I am aware that there have been increased wolf sightings and concerns in the Juneau area. Although I have not seen wolves myself in our frequent hikes around the island, people I know have. Some are thrilled and others are alarmed. It would seem to me a more appropriate response to concerns about human/wolf contacts due to increased wolf population would be to reexamine population numbers and determine whether there is a more appropriate number of allowable takes. If the proposal is intended to answer concerns about too many wolves, wouldn't that solution meet the management goal rather than completely removing the hunting quota? **Please do not implement Proposal #22.**

Thank you for considering my comments and for your service on the Board of Game.

Sincerely,

Susi Gregg Fowler

603 West 12th Street

Juneau, Alaska. 99801

(907) 586-3279



Submitted By
Janice Gregg Levy
Submitted On
12/25/2018 10:32:17 AM
Affiliation

Phone
907-586-1427

Email
levyjan@gmail.com

Address
534 5th Street
Juneau, Alaska 99801

I write to oppose Proposal 23, which as I understand it would expand archery hunting of mountain goats in the Juneau area. In the past few years there has been a reestablishment of the mountain goat population, the viewing of which is enjoyed by much of the population of the Juneau area. This wildlife viewing is enjoyed by people of all levels of physical ability. The goats can be seen from time to time from the JDHS parking lot and along Glacier Avenue as one looks up toward the face of Mt. Juneau; in the early spring as one walks or drives along Basin Road; and also by hikers on the Perseverance Trail, Mt. Juneau Trail, and Mt. Roberts Trail, among other mountain hikes in the area. I oppose any expansion of the allowed hunting of this species in the Juneau area. Thank you for your consideration of my comments.



From: Mary Ellen Arvold Dave Haas
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: BOG proposed regulations #22, #23 and #28 comments
Date: Monday, December 24, 2018 3:48:43 PM

My name is Dave Haas. I live at 2590 Fritz Cove Road, Juneau, Alaska and have lived at this address continuously the past 15 years. I am writing to comment on three proposed regulations, #22, #23 and # 28 which will come before the Board of Game next month.

#22) I oppose this proposed regulation. While I am not ultimately happy with the 3 wolves per year limit on harvesting wolves on Douglas Island, I wish that it were none. However, I appreciate the current regulation as a reasonable compromise. I have hunted deer in the Juneau area almost 40 years now and always enjoy seeing or hearing a wolf in the area. I always prefer having a more natural predator/prey balance than one devoid of predators - that is for most other areas of the world, not Alaska which truly represents "wild" in the world. Please don't take the wild out of our Juneau area.

#23) I oppose this proposed regulation. Allowing bow and arrow hunting of mt. goats on Mt. Juneau and nearby areas is simply too close to our population. From where we used to live downtown for 17 years, you could see mt. goats in the Mt. Juneau alpine areas. That means you'd also be able to see bow hunters and injured mt. goats. We don't want this near or in view of from our homes.

#28) I also oppose this proposed regulation. This simply takes the skill and difficulty of taking a prized big game animal out of the hunt. You might as well just hunt from your doorway in an easy chair. These hunters or policy makers should stay on their sofas with their electronic game players and away from our backyards baiting bears into our neighborhoods. This would be a joke of a "hunt".

Please do not approve any of these three proposed regulations as they all weaken quality hunting in Juneau specifically and Alaska in general. They don't deserve to have a place in Alaska.

Dave Haas



Submitted By
Steven Haavig
Submitted On
12/28/2018 1:49:02 PM
Affiliation

PROPOSAL : #22, REMOVE HUNTING QUOTA ON DOUGLAS ISLAND WOLVES

Please do not remove the hunting quota on Douglas Island.

PROPOSAL #23: ALLOW ARCHERY HUNTING OF MOUNTAIN GOATS ON MT JUNEAU AND NEARBY AREAS

I view these goats when I walk the Perseverance and Sheep Creek Trails. So do lots of other users like tourists and guests.

PROPOSAL #28: ALLOW BEAR BAITING IN JUNEAU

DO NOT ALLOW bear baiting in CBJ. My neighbor set up a baiting stand and shot a bear in his back yard 150 yards from Glacier Hwy. I heard the rifle sit from my house!



Submitted By
Gordon Harrison
Submitted On
12/26/2018 11:19:55 AM
Affiliation

I am opposed to Board of Game proposals #22, 23, and 28. With regard to #22, I believe that a viable wolf population on Douglas Island is imperative. With regard to #23, I object to the hunting of goats by archery or any other means near Juneau. These animals are a marvelous natural resource that can be seen by residents and visitors to our city. With regard to # 29, I believe that baiting bears is an unethical hunting tactic, and I especially object to it near Juneau where we have enough problems with bears being attracted to human food sources.



From: Mary Hausler
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: BOG proposal #22 proposal to remove hunting quota on Douglas Island wolves
Date: Friday, December 28, 2018 1:00:51 PM

Dear Board of Game, I am a long time Douglas Island resident who frequently hikes, snowshoes, and skis on Douglas Island on and off trails. I am vehemently opposed to this proposal to remove the annual 3 wolf quota on Douglas Island. The current regulation was put in place after a strong public reaction when a Juneau trapper targeted and killed an entire pack on the island. It was recognized at the time that wolves are an integral part of this ecosystem. It was also evident that many Juneau residents including those who are deer hunters or who have many friends and family members who hunt on the island enjoy knowing there are wolves on the island, and seeing their scat and tracks, and occasionally being blessed with a glimpse of a wolf. We're more than willing to share the deer with the wolves who were here before us. Part of what makes this place special is their presence.

Sincerely,

Mary Hausler
3240 Nowell Ave
Juneau, AK

From: Mary Hausler
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: BOG proposal #23 to allow archery hunting of Mt. Goats on Mt Juneau and nearby areas
Date: Friday, December 28, 2018 1:44:24 PM

Dear BOG,

I am writing to express my opposition to this proposal. As a long time Juneau resident and frequent hiker in the valleys and on the ridge tops covered by this proposal, I have often had the pleasure of seeing Mt. Goats. Sometimes they are tiny white dots off in the distance, but other times I have sat for hours observing goats at close proximity as they go about their business. In the Spring I can often see them from my living room or deck. The area covered by the proposal contains some of the most heavily used hiking trails and routes in the Juneau. They are important to both locals and tourists. Allowing hunting in this area would likely decrease the number of goats, and make the ones that remain more skittish, and inaccessible to wildlife viewers. There are other areas with goats that are on the Juneau road system that don't get as much use by hikers and Juneau visitors and are available to hunters.

Thanks for your consideration,

Mary Hausler
3240 Nowell Ave
Juneau, AK



From: Mary Hausler
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: BOG proposal # 28 Bear Baiting
Date: Friday, December 28, 2018 2:00:20 PM

Dear BOG,

I strongly oppose the proposal(#28) to allow bear baiting in the Juneau area (1C). This seems to me a particularly ill advised proposal. Juneau already has a garbage bear problem where too many residents don't do an adequate job of keeping human and pet food out of the reach of bears, and the bears suffer the consequences. This proposal would allow hunters to purposely lure in bears with human food so they can shoot them. How is this any different from the person who puts out food to lure in bears because they like to have them around? The second person hopefully gets fined because what they are doing is illegal, and dangerous, particularly to the bears. Why would we allow hunters to add to the problem of garbage bears with this same irresponsible behavior? It's a bad proposal that ought to be voted down.

Sincerely,

Mary Hausler
3240 Nowell Ave
Juneau, AK



From: Dave Hunsaker
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: BOG proposals 22, 23, and 28
Date: Thursday, December 27, 2018 3:10:21 PM

Dear Alaska Board of Game:

As a 45 year resident of Southeast Alaska, I wish to object strenuously to proposals 22, 23, and 28. These seem to be from some wrong-headed source who knows nothing about the management of game in this part of Alaska.

#22: We recall the time a single Juneau trapper targeted and killed every wolf in a pack on Douglas Island. This is the reason for the 3 wolf limit currently in place. These are fascinating creatures and deserve to live alongside other prey and predators and not to be wiped out so that mediocre hunters have a better chance of bagging a deer without competition.

#23: The goats that are being proposed to hunt on Mt. Juneau are MUCH more valuable to our economy and wilderness pleasure live rather than hunted by a select few. I remember when they were helicoptered in to try to reinstate them on that mountain after having been hunted to the point of extinction previously. The population is not so robust that they can take hunting at this point in time. For many visitors and residents of Juneau these goats are the only ones that they will ever see in the wild in their lifetimes. Please leave them be.

#28: Baiting black bears in the Juneau area is cowardly and despicable. Don't allow this to happen.

It is discouraging to see proposals such as these set forward by members of the board who clearly know nothing about wildlife or hunting in southeast Alaska.

thank you,

Dave Hunsaker
20139 Cohen Dr.
Juneau 99801
(907) 789-3486



Submitted By
Ric Iannolino
Submitted On
12/23/2018 6:16:27 PM
Affiliation

Phone
9079574059
Email
ricpaddles.alaska@yahoo.com
Address
PO Box 210883
Auke Bay, Alaska 99821

I have lived in Juneau for 40 years. I am a licensed hunter and active sportsman. I am familiar with the history of each of these proposals.

I OPPOSE each of the following 3 proposals #22, #23 and #28 all of them relate to the Juneau area.

Please recognize special circumstances that apply to the Juneau area. The 3 proposals concerning the immediate Juneau vicinity (Unit 1-C) are bad public wildlife policy and in no way justified. The proposals are #22, #23 and #28.

PROPOSAL: #22, REMOVE HUNTING QUOTA ON DOUGLAS ISLAND WOLVES

By Jesse Ross

This would eliminate the Douglas Island Management Area in GMU 1-C, removing the annual 3-wolf harvest quota for the island. This Management Area was set up years ago to restrict the number of wolves that could be killed on Douglas Island to no more than 3 a year. **A single Juneau trapper targeted an entire pack on the west side of the island and killed them all.** The public was outraged, charter companies complained because their clients no longer would be able to view wolves so close to Juneau while on board. The Game Board recognized the values and enjoyment to local residents and visitors that wolves provided as an important part of Douglas Island. The goal regulation is to guard against the over harvesting of wolves on the island, that is a very real possibility because of easy road and boat access.

PROPOSAL #23: ALLOW ARCHERY HUNTING OF MOUNTAIN GOATS ON MT JUNEAU AND NEARBY AREAS

By Jake Abbott

In the late 1980's, mountain goats were completely gone from Mount Juneau and Mount Roberts. The primary cause was overhunting. Goats on Mount Juneau were even shot in plain view of the city residents and visitors who were viewing them. A friend of mine shot a goat in the late 1970's when he returned home from his hunting trip he received 7 calls from people who watched the goat he shot fall off a cliff. He did not realize so many people each morning had watched the goat over coffee before work. The area was closed to hunting. A program was initiated by local residents with the cooperation of Alaska Department of Fish and Game to transplant goats to Mount Juneau. These animals are viewable for the enjoyment of locals and visitors in the spring and summer months

There is alternative hunting in the Juneau area to accommodate goat hunters; the mountains northwest of Mendenhall River are open and accessible by road.

PROPOSAL #28: ALLOW BEAR BAITING IN JUNEAU

By Jake Abbott

Baiting black bears has been prohibited in the Juneau Game area for over 20 years, in recognition of the problems caused by bears attraction to human food that resulted in a chronic garbage bear problem. The present Board of Game needs to understand that the Juneau is a densely populated along a narrow strip coast. I encourage the Board to strongly reject Juneau GMU 1-C from areas open to bear baiting.



Alaska Dept. of Fish and Game
Boards Support Section
Southeast BOG Meeting
Fax: 907-465-6094

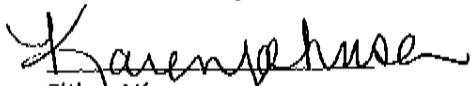
Board of Game members:

This comment is in support of **Proposal 16**, which would return the opening day of the Southeast Alaska waterfowl season to September 1st. Our family always participated in the waterfowl season during the first week of September and we strongly support changing the season back to the September 1 – December 16 time period.

Proposal 15 asks to extend the waterfowl season into January. We **strongly oppose Proposal 15** as this proposal would further delay the start of the waterfowl season until sometime in October.

Thank you for your time.

Sincerely,

 Sitka, AK	→ Karen Johnson
 Sitka, AK	Marty Johnson
 Sitka, AK	Chris Lilliohof
 Sitka, AK	Kevin Johnson
 Sitka, AK	Bob Widmayer
 Sitka, AK	Chatham Connor
 Sitka, AK	Spencer Shute



Alaska Dept. of Fish and Game
Boards Support Section
Southeast BOG Meeting
Fax: 907-465-6094

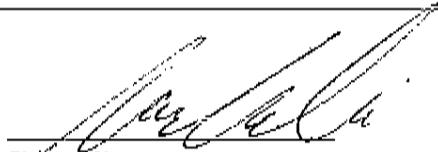
Board of Game members:

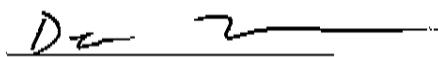
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Thank you for your time.

Sincerely,


Sitka, AK Reid Sanocki


Sitka, AK Devan Johnson


Sitka, AK Mike Johnson


Sitka, AK Josh Johnson

Sitka, AK

Sitka, AK

Sitka, AK



Submitted By
Bob King
Submitted On
12/26/2018 1:40:31 PM
Affiliation

Phone
907-957-2355
Email
fishorian@gmail.com
Address
419 Kennedy Street
Juneau, Alaska 99801

I oppose proposals #23 and 28, to allow bow hunting for goats on Mount Juneau, Roberts and other nearby mountains, and bear baiting in the Juneau area. I enjoy seeing the goats from my home in downtown Juneau and when I hike up Perseverance. I know they are enjoyed by many other local hikers and visitors even if they only view them from the scopes on the cruise ship docks. Let bow hunters find their goats further out of town. As for bear-baiting, there's no sport in that. It only attracts more trash bears to downtown Juneau, already a problem. Please reject these proposals. Thank you.



From: mary lou
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Comments on Alaska Board of Game proposals #22, #23 and #28
Date: Monday, December 24, 2018 2:17:37 PM

#22 REMOVE HUNTING QUOTA ON DOUGLAS ISLAND WOLVES: Could information be found on how many deer are killed by wolves each year? And when there were more deer on the Island, how many deer were killed by hunters each year? Before this proposal is passed more information should be known to be able to make good rules for managing both wolf and deer populations.

#23 ALLOW ARCHERY HUNTING OF MOUNTAIN GOATS ON MT JUNEAU AND NEARBY AREAS: Viewing wild goats is a harmless and valuable attraction for both local people and tourists. Viewing wild goats on Mt. Juneau from the streets in downtown Juneau is a rare and exciting thing that very few people in world will have the opportunity to see. The Board should not allow any hunting of goats close to where people live in the Juneau area or along Gastineau Channel.

#28 ALLOW BEAR BAITING IN JUNEAU: Bear baiting is not fair chase hunting and is not a good way to treat bears. In the Juneau area with a large number of people living close together because of the constricted geography, bear baiting could cause bear conflicts that can be dangerous. Because we also have many trails and many people using them, having conflicts with baited bears along these trails would be dangerous. Please do not allow bear baiting in the Juneau area.

Juneau Resident
Mary Lou King



From: Daniel F Kirkwood
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Comments on proposals #22/23 and 28
Date: Monday, December 24, 2018 7:01:46 AM

Dan Kirkwood
Juneau, AK

Dear Board of Game Members,
I am a licensed resident hunter. I love hunting to provide outstanding food for the table and rewarding outdoor experiences.

Proposal #20 Support

As a frequent Douglas hunter, I recognize the increased pressure that Douglas deer faced as busier schedules and increased gas prices encourage many of us to hunt closer to home. Limiting our harvest of does seems like the responsible step to helping the deer. Allowing one doe seems reasonable. Hopefully it will force me to up my hunting!

Proposal #22 Oppose

Part of what makes hunting in Alaska special is that the land is still wild. If we remove the predators that helped shape our prey, we might as well also put out salt licks and run some fences to improve our chances as well. Then I might as well just go buy some beef.

As a hunter, I enjoy seeing wolves and wolf tracks. It's a rare but thrilling Alaskan sight. I support reasonable, data based quotas for all species that ensures that others get a chance to enjoy our natural heritage, which is hunting truly wild game.

I grew up in Pennsylvania and have hunted deer in Maryland and Virginia. For me, our game in Alaska is more valuable because of the challenge and risk of hunting alongside other predators.

Proposal #23 Oppose

I would support opening up more archery opportunities for mountain goats on the road system. However, I feel like opening hunts on Mount Juneau, Mount Roberts or Thunder Mountain where goats are accustomed to close human presence would not qualify as fair chase. This would also impact my other use of them: enjoying watching them close to town to inform my hunting in other places.

When I had an office downtown, I would observe the Mt. Juneau goats with my spotting scope and binoculars during long conference calls. I would watch their behaviors and note their movements. I often take my spotting scope up Granite Creek or Thunder Mountain to observe goats, bears and other wildlife during the spring grouse hunting season. Having such awesome beasts close to town is a mark of what makes Juneau great. I would hate to see that population disperse due to hunting pressure.

I support limited bow opportunities for goats on the road system, but only with consideration given to ensuring that we can enjoy watching them as well.

28 Oppose



GMU 1-C is too densely populated to allow for responsible bear baiting. The likelihood of this creating conflicts with other land users and creating problem bears with other human attractants seems too high. The Board of Game has helped Juneau address its chronic human/bear conflict by prohibiting baiting. Please continue to stick to that excellent course of action.

--

Daniel F. Kirkwood

dfkirkwood@gmail.com



Submitted By
Gladi Kulp
Submitted On
12/24/2018 10:07:47 AM
Affiliation
Juneau resident

Phone
907-723-0460
Email
gladikulp@yahoo.com
Address
640 Hemlock St.
Juneau, Alaska 99801

December 24, 2018

Open letter to The Board of Game for the January 11-15th scheduled Meeting:

I have lived and worked in Juneau since 1985. While I am not a hunter, many of my friends are and I do enjoy cooking and eating wild game. I also enjoy watching wildlife and believe that a balance must be maintained so that animals are protected and not villianized.

I thank the Board for holding its scheduled meeting in Southeast Alaska and the opportunity to give my personal input on three key proposals in Unit 1-C that will directly impact our area.

Proposal #22:

I oppose proposal #22 because wolves are an integral part of our archipelago including Douglas Island. They have shown no negative impact on the local deer or domestic animal populations and provide the balance needed to maintain a distribution of healthy animals. To have an opportunity to see or hear a wolf on Douglas or anywhere, is a true Alaskan experience enjoyed by many – locals and visitors. To trap all the tiny population of the Douglas wolves is to eliminate the sense of true wilderness Douglas can provide for all users. Also, it's good animal conservation.

Proposal #23:

I oppose proposal #23 because I remember when there were no mountain goats on our ridges around Juneau. They were hunted out years ago. I remember the intense local effort, funded by energy and personal money, to reintroduce the goats to the ridges that they once inhabited. The herd has done well over the past 20 years. To walk Perseverance trail or hike the ridges or even look up from your porch or office window and see goats naturally positioned high on the ridges is a special opportunity especially as it is so close to town. Just the tourists who appreciate the experience makes it all worthwhile. The area is better served for viewing and non-consumptive uses. The opportunity to hunt goats is offered in numerous and more remote drainages accessed on the road system.

Proposal #28:

I oppose baiting Black Bears in the Juneau area for hunting. It is just not smart. The last thing we want to do is to habituate our local black



bears to human food. I have had a bear in my kitchen. I opened my front door this year greeted by a black bear.

One was eating on my deck one evening this year from the bird feeder for lack of berries and salmon. We have a chronic bear garbage problem in Juneau and the community works hard at trying to keep them on natural foods and not our garbage. Once they are habituated to garbage, their chances of being destroyed are greater and to be hunted with bait only compounds the issue and is frankly, poor hunting ethics in this part of Alaska.

Thank you for considering my views.

Gladi Kulp

640 Hemlock St.

Juneau, AK 99801



Submitted By
Stephan Lee
Submitted On
10/10/2018 7:48:22 AM
Affiliation

I support proposal 16. Significant numbers of sandhill cranes migrate through Gustavus prior to Sept 16. Also significant numbers of green winged teal and pintails migrate through the mendenhall refuge prior to Sept 16. The fall migration is over by Dec 16 and only fishy tasting mallards and seaducks teremain on the mendenhall wetlands with a wily local Vancouver goose population. Not many hunters use the area after the fall migration after the first week of November.



From: Steve Lewis and/or Rachel Myron
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Comments in Opposition to Proposals 22,23, and 28--
Date: Wednesday, December 26, 2018 11:05:33 AM

Gentlefolk:

I am opposed to several of the proposed regulation changes that will be discussed at the Petersburg meeting of the Board of Game.

Proposal 22 suggests that removing quotas on hunting wolves on Douglas Island. This is an ill conceived idea----with the easy access to most of Douglas Island, wolves could quickly be eliminated from the island-something that has already occurred in the past and something that the quotas were designed to protect against. ADF&G has proposed a slight change in deer harvest levels on Douglas Island as study of wolf and deer numbers continue. This is a much more sensible reaction to potentially higher populations of wolves on the Island.

Proposal 23 would allow archery hunting of goats closer to town on Mt Juneau and Mt. Roberts. These areas are better preserved as places for the public in general to observe goats while continuing to allow hunters to harvest goats in areas more distant from commonly accessible trails.

Proposal 28 suggests allowing baiting of black bears. This is an absurd proposal. It declares that since this is legal in the Mat Su area, that it should be legal in Juneau. Bosh. Baiting black bears will increase the garbage bear problem in Juneau and is an unethical means of hunting to boot. Not only should you reject this proposal, but you should consider eliminating baiting of black bears throughout the state.

Thank you for considering these comments.

Sincerely,

Steve Lewis,
Tenakee Springs, AK



Submitted By
Marina H Lindsey
Submitted On
12/9/2018 3:44:15 PM
Affiliation

Phone
9077231116

Email
marinahlindsey@gmail.com

Address
3431 Greenwood Ave
Juneau, Alaska 99801

Dear Board of Game,

I am writing in support of PROPOSAL 13: 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions. I have been a recreational fisherman in Southeast Alaska for decades and agree that trappers should have to put labels on their gear, just as recreational and commercial fisherman have to label their gear. Without proper labeling, Alaska State Troopers have a reduced capability of enforcing trapping regulations and seasons, and ADF&G cannot follow up on inquiries from the public about traps and snares. Without a visible name or identification number, individuals including other trappers and users of the forest like hikers and hunters, cannot let a trapper know (through ADF&G) if there are targeted or non-targeted animals alive, dead or injured in the traps/snares.

If people are trapping legally and ethically, I see no reason why they would have any issue with labeling their traps with their names or permanent identification numbers. I certainly have no problem labeling my shrimp and crab pots, and because of having my contact information on my crab pots, have had lost gear returned to me.

Thank you for considering the reinstatement of the fur trap tag requirement language. It is fair and reasonable requirement.

Sincerely,

Marina Lindsey



Submitted By
Brian Lynch
Submitted On
12/15/2018 11:13:09 AM
Affiliation
Self

To: Alaska Board of Game Re: Southeast Region 2019 Meeting Proposal #53

I am in support of Proposal #53 to modify the legal area description within the Petersburg Management Area (PMA) from "at least 1/2 mile from an airport property"... to "at least 100 yards from an airport property." As one of the archers who drafted the existing PMA proposal in the early 2000's, I am in complete agreement with proposers rationale for the proposed change and his historical summary of the reasoning for the establishment of the PMA. I believe the change would help to reduce the deer population in and near the city of Petersburg and, in turn, reduce the numbrs of deer being killed or injured by motor vehicles as well as reducing the significant damage deer cause to both vegetable and flower gardens within the city.

I urge the Board of Game to approve and pass Proposal #53

-Brian Lynch



Submitted By
Jennifer MacDougall
Submitted On
12/28/2018 4:31:05 PM
Affiliation

Phone
907-957-7042

Email
MacDougall.jen@gmail.com

Address
2192 Lawson Creek Rd, Apt A
Douglas, Alaska 99824

I am writing to support the proposal 14 that requires trappers to post trapline signs. I often hike trails around Juneau with my two dogs, and I am concerned that trappers can set traps on public land without warning the public. Traps are dangerous to dogs (as well as non-target wildlife) and signs announcing trapline presence should be required to give hikers proper warning. Thank you.



Submitted By
Keegan
Submitted On
12/28/2018 10:13:18 AM
Affiliation
Coastal Alaska Adventures

Phone
McCarthy
Email
akpointer@hotmail.com
Address
9803 Nine Mile Creek Rd
Juneau, Alaska 99801

Dear Board of Game and it's Members.

I am a lifelong resident of SE Alaska, as well as a Master Hunting Guide and owner and operator of Coastal Alaska Adventures. We offer guided bear and deer hunts in units 1-4. As a guide, commercial fisherman and tour operator I spend well over half the year on the waters and lands of SE Alaska. I am immersed in the area, as well as see and hear a lot of what happens here.

Please accept these written comments on the following proposals-

Proposal 3- Salvage of deer rib meat

I was raised and firmly believe that if you harvest an animal you consume the meat, all the edible meat. Having harvested deer in SE Alaska since 1984 I have never discarded the rib meat. It is easy to remove from the bone and makes excellent burger or sausage. We even often pressure cook them a bit on the bone and barbeque, they are excellent. Allowing hunters to not salvage edible meat simply because it's too much work seems like we would be headed down the wrong path as hunters. Sitka Black Tail deer is the best venison in the world, let's not make a precedent of wasting usable meat.

Proposal 4- Allow the harvest of game from a boat in Units 1-5

I believe this may be the most important proposal we address during this process. I will start by saying I am adamantly opposed to it. As stated I spend the majority of the year on the water, a great deal of this during hunting seasons. I have personally witnessed many vessels "running beaches" and gunning for deer. First and foremost it is not an ethical way to hunt nor does it in anyway represent one of the things I believe Alaska stands for- Fair chase.

Our State has a responsibility to maintain an ethical stance on this. Shooting any animal from a vessel based on saltwater is not ethical. We have first-hand experience of this, in 2017 we had a permit issued to attempt to harvest a brown bear from a vessel for a disabled hunter. After over 10 seperate stalks and attempts to get the vessel stable enough it was deemed not doable by me, my guides and the hunter. No shots were fired as the risk of wounding was too high. We ended up doing the smart thing and took more time and got our hunter out on the beach. Yes, it took some more work, but hunting is not always supposed to be easy. Do we want to make it easier to wound animals? That is truly what this is about. Just last deer season I found 3 deer in the timber that had been wounded by beach hunters in Seymour Canal, an area with a high abundance of "boat hunters". We witness them often shooting from boats, and later we find the results. We also find a few bears each year that have been wounded by hunters, to increase this is not acceptable.

We do not need to allow people to shoot from boats to be more successful. Opportunity abounds for hunters to safely and successfully harvest animals in SE Alaska from the ground. Simply making it easier for lazy hunters does not make sense. The perception of hunters nationwide is already at an all time low, lets not make us look like slobs that need to take pot shots at animals on a beach. Keep the pride in Alaska's hunting heritage of fair chase and ethical.

Proposal 8 and 9-

- Rescind the guide requirement for nonresidents hunting black bear in the Southeast Region
- Change the nonresident black bear permit hunts for Units 1B, 1C, and 1D to general season hunts

In the early 2000's to about 2010 we saw a massive increase in black bear harvest in SE Alaska. A true conservation issue existed and was addressed by those concerned and brought to the BOG. Regulations were developed through extensive meetings with the BOG, ADFG and USFS to create the system that is currently in place allowing for hunters that use a guide to not have to draw a tag for black bears in Units 1-3. If a non-resident hunter chooses to hunt black bear without a guide they must apply for a draw. This was done to put a limit on the number of non-resident hunters who harvest black bears in SE Alaska without a guide. The alternative was a region wide draw system for black bears, something we all hoped to avoid. This current system as adopted gives excellent, and well-regulated opportunity for all hunters, with nothing but positive benefit to the RESIDENT hunter.

Guides already face tight restrictions on the numbers we can harvest, and as part of this agreement guides across the region agreed to



take 20% less hunters than what we are even allocated to help alleviate conservation issues. The goal was simply to regulate the number of bears harvested. Without this system the unguided segment of black bear hunters in SE Alaska was not regulated, harvest was high and hunting pressure unacceptable. To those not involved in the original development of this, it was not done in haste, or in an unfair manner. It was done solely to keep hunting opportunity available in SE Alaska for residents first, and second the nonresident sector.

A few key things to remember-

- This in no way effected the resident hunter
- Guides did not receive any additional hunting allocation, in fact resulted in reduction
- Harvest levels have decreased in many areas
- Wounding loss was at an all-time high with nonresident unguided hunters
- The hunting experience in SE Alaska was severely impacted by overabundance of hunters

As a guide, and someone who is in the field consistently I can tell you a few things. Prior to the implementation of this regulation the black bear hunting pressure was unmanageable. It would not be uncommon to see up to 10 Unguided NON-RESIDENT hunters on one boat in a bay hunting black bears. What resident hunters may not realize is that these unguided hunters were decimating bear populations. Sow harvest was high, wounding rates off the charts. They were not only impacting our businesses and way of life, as a resident hunter I knew they were limiting the resident opportunity. Most residents do not spend the time in the field a guide does, they do not see what is really happening out there, we do. We keep tabs on everything happening in our units. To watch a conservation issue develop, grow and go unaddressed is unacceptable. But, there are other issues at hand as well, social issues. The unregulated non-resident hunters through sheer numbers were destroying opportunity for the resident hunter, if not through harvest numbers then by limiting areas for people to hunt.

We have now witnessed the success of this regulation, but it is not time to stop. We are slowly starting to see higher bear numbers, but still not the number of quality mature males we would see in the past. The good thing is we are seeing more "recruits", subadult male bears, or more important the bears we most need to protect. Increasing harvest at this point in time, risk us moving back to an area where we may see a conservation issue again. From experience, and numbers we saw in the past, the unguided nonresident hunter is less educated on harvesting mature male animals, black bears being very difficult to judge. We do not want to head back down this slippery slope. Bears take time to mature and age, we are on the right track to seeing a quality hunting experience reemerge in SE Alaska.

I implore the Board to take all this into consideration and not approve these proposals, from someone who is in the field every day of the season. We imposed the regulations to keep a quality, ethical and conservation minded experience available in SE Alaska. While I seldom question ADFG and their opinions I must on this. They work hard but they are not in the field, they do not see what we see. Their job is conservation, and that is excellent, but as stated, there is much more to think about here. To simply judge the health of an animal population by hunter success is not always accurate. ADFG has done no formal black bear population estimates to my knowledge in nearly 15+ years. We are in the field daily seeing what is happening. I would propose the inverse of what ADFG sees, hunter success and numbers seem higher because there are **less** hunters in the field. There is less pressure on the resource, bears being human sensitive, are frequenting beaches at higher rates, allowing for fewer hunters in the field to be more successful at harvesting larger mature males. This was one of the purposes of the draw, to make the hunt seem special, more of a rare chance than kill a bear each year. Hunters now may be taking time to think about what they are about to shoot, knowing the tag took effort to get. Keep these things in consideration when reviewing these proposals. We are on the cusp of what we were hoping to accomplish, let's not stop now.

We are rebuilding what can be one of the best black bear hunting opportunities in the world for everyone, to stop short now makes no sense. I hope someday to take my kids out and be able to share with them what SE Alaska was and can be if properly managed and not given away to unregulated non-resident hunters.



Submitted By
James McKnight
Submitted On
12/11/2018 12:53:08 PM
Affiliation
none

Phone
907-500-8174

Email
jmcknight00@yahoo.com

Address
3804 Melrose Street
Juneau, Alaska 99801

Proposal #3: I am in favor of this proposal. The current requirement to salvage rib meat for Sitka Blacktail deer does not make a whole lot of sense from a wanton waste standpoint. The very small amount of actual edible meat on the ribcage does not justify spending the time and energy to salvage it. I would argue the belly flap contains more meat than the rib cage but there is no requirement to salvage it. (even though I do anyway). There are some states that do not require salvaging rib meat from moose, even though moose are many times larger than Sitka Blacktails.



From: KJ METCALF
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Proposals #22, 23, & 28
Date: Thursday, December 27, 2018 11:23:30 AM

I urge the Board of Game to reject proposals 23,24 and 28. I am a 54 year resident of Southeast Alaska - have been a subsistence , as well as a sports hunter. I'm adamantly opposed to these three proposals:

#22 Wolves on Douglas Is (where I live) - we worked hard to have the trapping restricted in order to maintain a viable population of wolves.

#23 Mt goats are more valuable viewing than hunted.

#28 Totally unsafe to habituate bears to food. This runs counter to all forms of camping, remote cabins and urban settings. This has no relation to "fair chase."

K.J. Metcalf
PO box 20221 Juneau 99802



Submitted By
Mark Miller
Submitted On
12/15/2018 4:58:45 PM
Affiliation

I agree that proposal 13 5 AA 92.095 should be enacted to require trappers to identify their traps with their name and contact information. This facilitates resolution of any issues that are almost impossible to settle if contact information is unavailable. It seems only practice to have some means of identifying trap ownership. I would think trappers would identify their traps without being required to do so.

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



Submitted By
MARK J MILLER
Submitted On
12/23/2018 7:44:36 PM
Affiliation

Hi I'm writing to express my opposition to proposals 22, 23, and 28.

I oppose proposal # 22 concerning removal of hunting quota on Douglas Island wolves.

I know there are presently fewer deer on Douglas Island because of the wolves. I also understand that many wolf studies indicate the need for wolves to keep a healthy balance of other animal populations. I traverse Douglas Island quite a lot and I have yet to see a wolf on Douglas Island. I am very much looking forward to that opportunity.

I oppose proposal # 23: Allow archery hunting of mountain goats on Mt Juneau and nearby areas.

When I moved to Juneau in 1974, it was rare or impossible to view mountain goats in the proposed areas. I hike these areas regularly and very much appreciate seeing the goats now, as do many other people I see while hiking. Goat viewing by many, is a much more valuable asset to the Juneau area than the small harvest benefit of a few bow hunters.

I oppose Proposal # 28: Allow bear baiting in Juneau.

It seems counter productive to make a big effort every year to keep bears out of waste human foods and then allow waste human foods to be used as an attractant.

I also think it would be very dangerous for an unsuspecting hiker to approach a bait station and startle a bear. It seems likely the bear would aggressively protect its food supply and put hikers at risk.

Thanks you for your consideration of my comments.

Sincerely, Mark Miller



United States Department of the Interior

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

IN REPLY REFER TO:
10.A. (AKRO-RNR) 20181203

DEC 12 2018

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

Dear Chairman Spraker:

The National Park Service (NPS) appreciates the opportunity to comment on the 53 proposals for the Southeast Region Game Management Units (GMUs) 1-5 being considered by the Alaska Board of Game (BOG). Below are our recommendations on proposals that affect or have the potential to affect NPS areas.

The National Park Service mission and mandates differ from the State of Alaska and other federal agencies, and hunting activities in NPS areas may therefore require different management approaches that are consistent with NPS enabling legislation and the Alaska National Interest Lands Conservation Act (ANILCA).

We recognize and support the State's primary stewardship role in wildlife management. At the same time, we must ensure that federal laws and regulations applicable to national preserves are upheld.

Proposal 3: NPS Recommendation: Oppose

This proposal would remove the salvage of rib meat requirements for Sitka black-tailed deer in Unit 1-5.

Failure to salvage edible meat from harvested ungulates is prohibited under both Alaska Hunting Regulations and Federal Subsistence Management Regulations for the Harvest of Wildlife on Federal Public Lands in Alaska. The NPS opposes exceptions to these provisions.

Proposal 13 and 14: NPS Recommendation: Support

These proposals would require trappers to use identification tags (proposal #13) and signage (proposal #14) near traps and snares.

The NPS supports the intent of these proposals. Identifying owners of specific traps or snares would reduce any confusion or conflicts regarding ownership. In addition, visitor enjoyment and



safety is a high priority for the NPS, and posted signs would alert visitors to trapping or snaring activity and reduce the chances of visitor injury.

Proposal 15: NPS Recommendation: Oppose

This proposal would extend the waterfowl hunting season by 30-60 days, from 31 December to January and February.

The season length for waterfowl hunting is determined annually under the Migratory Bird Treaty Act and may not exceed 107 days. Seasons in GMUs 1-5 are already at the maximum length allowed by the Act. To extend the season would violate federal law.

Thank you for this opportunity to provide comments on these important wildlife regulatory matters. Should you or your staff have any questions, please feel free to contact Mary Hake, Wildlife Biologist and liaison to the Board of Game at 907-644-3576 or me.

Sincerely,

Debora Cooper
Associate Regional Director
National Park Service

Enclosure

- cc: Doug Vincent-Lang, Acting Commissioner, ADF&G
Kristy Tibbles, Executive Director, Alaska Board of Game, ADF&G
Acting Chief, Division of Wildlife, ADF&G
Steve Wackowski, Special Assistant to the Secretary for Alaska
Herbert Frost, Regional Director, NPS
Greg Siekaniec, Regional Director, USFWS
Tom Doolittle, Deputy Assistant Regional Director, USFWS-Office of Subsistence Management
Ben Bobowski, Superintendent, Wrangell-St. Elias National Park and Preserve
Philip Hooge, Superintendent, Glacier Bay National Park and Preserve
Jason Taylor, Regional Chief of Natural Resources, NPS-Alaska Regional Office
Andee Sears, Regional Law Enforcement Specialist, NPS-Alaska Regional Office



BOG Wildlife Proposals for January and March - 2019

Find full proposal descriptions at <http://www.adfg.alaska.gov/index.cfm?adfg=gameboard.proposalbook>

Please review - Deadline for Priority and Comments: October 15, 2018

No.	Species	Park(s)	Proposal Description	GMU	NPS Comment
Southeast Region Wide and Multiple Units 1 - 5					
1	Big game	WRST & GLBA	Allow the use of crossbows in restricted-weapons hunt	1 - 5	WRST: no comment -- best I can tell there are no restricted-weapons hunts in Unit 5 (BAC) GLBA: No comment. There are no restricted weapon hunts in 5A or 5B. (Jim Capra).
2	Deer		Allow the feeding and harvesting year-round on private land	1 - 5	
3	Sitka black-tailed deer	WRST & GLBA	Modify the salvage requirement to make the salvage of rib meat optional	1 - 5	WRST: no comment -- no open season for deer in 5B (Barbara Cellarius) GLBA: Oppose. Deer are barely present in GLBA portion of 5A, but the season is open. Oppose on the basis of leaving edible meat in the field (Jim Capra). AKRO: See pg. 22 of 2018-2019 Alaska Hunting Regulations. All rib meat must be salvaged from all big game species, otherwise it is considered wanton waste. There are no exceptions for smaller animals, and no consideration to time spent processing. This is a potentially slippery slope, and should be opposed (Dave Payer).
4	Game	WRST & GLBA	Allow the harvest from a boat not under power	1 - 5	WRST: no comment -- seems mostly related to deer and no open season for deer in 5B. But I'd defer to law enforcement concerns if Jim or Adam weight in (Barbara Cellarius). GLBA: Support with the clarification that this is fresh waters. (Jim Capra)
5	Moose	WRST & GLBA	Shorten the season to two weeks (from 1 October to 15 October) and allow "any bull" to be legally taken	1 - 5	WRST: no comment. Harvest limit in 5B is currently "one bull" and hunt is managed using a quota which presumably would address conservation concerns. So there doesn't really seem to be a good justification for shortening the season. I still think no comment, but if someone thought we should oppose, part of the justification could be that seasons should be set on a unit by unit basis reflecting local conditions, rather than aligning the season in all of SE AK. (Barbara Cellarius) GLBA: Oppose - Seasons in GMU 5 are limited by quota and management is further guided by area specific data. There is no reason to include GMU 5 in a regionwide proposal (Jim Capra).
6	Black Bear	WRST & GLBA	Remove requirements for residents to salvage hides and instead require salvage of meat season-round	1 - 5	WRST: no comment. Seems like there would be a salvage requirement either way.
7	Black Bear	WRST & GLBA	Eliminate the sealing requirement by resident hunters	1 - 5	WRST: not sure about this one. Sealing provides more information than a harvest ticket might, but I don't know that there is much black bear harvest in 5B. Sealing does not appear to be required for black bears harvested elsewhere in WRST. Leaning toward no comment. (Barbara Cellarius) GLBA: No comment (Jim Capra). From Tania Lewis GLBA Wildlife Biologist: Oppose. Sealing black bears provides opportunity for ADF&G to collect important information on bears' age, size and health for management purposes, as well as color phase and genetic material for research interests. We are currently collaborating with ADF&G to analyze over 270 such black bear samples from GMUs 1C, 1D, 5A and 5B to examine genetic population structure of black bears within the range of the glacier bear. AKRO: Agree with Tania re. value of sealing info but would defer to ADFG, since it is their requirement. No comment (Dave Payer). Oppose (as in the past) resident tag fee exemptions for brown bears as it is just an incentive to kill bears and population densities of bears in our region is relatively low (Kyle Joly).
8	Black Bear	WRST & GLBA	Rescind the guide requirement for nonresident hunting	1 - 5	WRST: no comment. Assuming this requirement exists (I haven't obviously found it in the handy dandy, but maybe it is hiding somewhere), the proposal seems to be an allocation issue. (Barbara Cellarius) GLBA: - No comment. This requirement does not exist in GMU 5 (Jim Capra)
9	Black Bear		Change the nonresident permit hunts to a general season	1B, 1C & 1D	

Oppose



10	Coyote	WRST & GLBA	Require sealing	1 - 5	WRST: could support because requiring sealing would provide information on harvest levels. Although I suspect Unit 5B coyote harvests are limited, so no comment would also be a reasonable position. (Barbara Cellarius) GLBA: - No comment. Harvest is small and reported through the trapper questionnaire (Jim Capra). AKRO: No comment. If further information on harvest intensity is required, harvest tickets would be a simpler way to go. (Dave Payer)
11	Beaver	WRST & GLBA	Extend the trapping season from April 30 to May 15 (15 additional days) with no limit	1 - 5	WRST: no comment. trapping in the WRST preserve, especially by folks who aren't federally qualified, is very limited. (Barbara Cellarius) GLBA: - Support. This was the traditional season length in GMU 5 until a recent change (Jim Capra). AKRO: I would like to know what the justification for the recent change was before supporting this. The proposal has no information. (Dave Payer)
12	Beaver		Modify the trapping season to have no closed season	1	
13	All	WRST & GLBA	Require ID tags for traps and snares	1 - 5	WRST: my recollection is that NPS may have supported this kind of requirement in the past, for enforcement reasons. Maybe check some of the old letters? (I did go back to old letters and couldn't find anything on this, maybe Deb Cooper will remember (M Hake). Would be interested in what Jim suggests. (Barbara Cellarius) GLBA: - Support. For both enforcement and reducing conflicts. Allow trappers to use their name and address or hunting license number or drivers license number on the tag (Jim Capra).
14	All	WRST & GLBA	Require trappers to post ID signs for traps and snares	1 - 5	WRST: my recollection is that NPS may have supported this kind of requirement in the past, for enforcement reasons. Maybe check some of the old letters?. Couldn't find any old letters (M Hake). Would be interested in what Jim suggests (Barbara Cellarius). GLBA: - NO comment. I support the idea, but in practice I have seen too many cases when this was required that it did not happen and the trapper stated the sign fell down or anti-trappers stole it (Jim Capra).
15	Waterfowl	WRST & GLBA	Lengthen hunting season from December 31 to January and February (additional 30-60 days)	1 - 5	WRST: I don't know enough about this one (i.e., whether there are federal migratory bird seasons that overlay the state seasons, but suspect that waterfowl harvest in the winter in 5B would be very limited. So no comment would probably be fine. Also with respect to migratory bird harvest regs/hunting zones, Southeast is Units 1-4, Unit 5 is included in the gulf coast regs. So this proposal might not even apply to Unit 5. (Barbara Cellarius). GLBA: Oppose. Season length is determined annually under the MBTA. Alaska seasons in GMUs 1-5 are already at their maximum length allowed by treaty. To extend the season would require starting later. In GMU 5 the peak migration is approx. Oct. 10. This proposal would possibly delay the season until most of the opportunity is past. (Jim Capra). AKRO: Oppose, for the reasons well articulated by Jim (Dave Payer)
16	Migratory game birds		Shift hunting opportunities two weeks later in the season (from September 1- December 16 to September 16 - December 31)	1 - 4	
Sitka Area - Unit 4					
17	Waterfowl		Reserve waterfowl hunting areas for local hunters	4	
18	Deer		Increase bag limit from 4 to 6 deers in some areas	4	
19	All		Close hunting area around Green Creek Mine road system and mine infrastructure	4	
Unit 1C, 1D and 5 - Juneau, Haines, Skagway and Yakutat Areas					
20	Deer		Change the bag limit on Douglas Island	1C	
21	All		Amend the area that is closed to hunting along Douglas Highway	1C	
22	All		Eliminate the Douglas Island Management Area	1C	



23	Mountain Goat		Expand the archery-only registration permit hunt area	1C	
24	Mountain Goat		Clarify the boundary description for the RG014	1C	
25	Moose	GLBA	Restructure hunt to align with the federal subsistence regulations	5A	GLBA: - Support to reduce confusion and spread out harvest. (Jim Capra)
26	Moose	GLBA	Reauthorize the antlerless season - Nunatak Beach	5A	GLBA: - Support. Recent surveys show that the hunt may be viable again in the near future (Jim Capra). AKRO: No comment/neutral. From the data provided by ADFG in the proposal, its not clear to me that there is any rush to reauthorize the antlerless season. The population declined severely and has apparently been very slow to recover. However, this proposal merely reauthorizes a registration hunt, and permits would only be issued if the population increased to at least 25 animals. I suggest we remain neutral. (Dave Payer)
27	Moose		Reauthorize the antlerless season	1C	
28	Black Bear		Issue permits for using bait or scent	1C	GLBA: Oppose for Unit 1C. This proposal would allow for black bear baiting in Gustavus which is surrounded by National Park lands. Black and brown bears move in and out of the park and Gustavus frequently so essentially this could lead to conditioning of park black and brown bears to anthropogenic food. (Tania Lewis). AKRO: No comment. Baiting is prohibited on NPS lands, but NPS has no control outside boundaries. (Dave Payer)
29	Waterfowl		Shift hunting opportunities two weeks earlier in the season (from September 16- December 31 to September 1 - December 16)	1C	
30	Waterfowl		Create a youth hunt at Mendenhall Wetlands State Game Refuge	1C	
31	Mink, Otter and Beaver		Allow the use of submerged traps in the Juneau closed area	1C	
32	Furbearers		Modify the regulation to close trapping and restrict the use of certain traps near roads and trails within the Skagway Borough	1D	
33	Mountain Goat		Open a drawing hunt on Cleveland Peninsula	1A & 1B	
34	Mountain Goat		Open a registration hunt on Cleveland Peninsula	1A & 1B	
35	Mountain Goat		Change the hunt structure for Revillagigedo Island	1A	
36	Deer		Increase the bag limit along Cleveland Peninsula to four bucks (from 2)	1A	
37	Deer		Reduce the harvest objectives from 700 to 350-400	1A	
38	Beaver		Extend the trapping season (from 2 weeks to 4 weeks)	1A	
39	Deer		Shorten hunting season by one month (August 1 to November 30)	2	
40	Deer		Decrease the nonresident bag limit (from four to two)	2	
41	Deer		Require harvest tickets to be attached at the time of harvest	2	
42	Wolves		Increase the annual harvest (from 20% to 30%)	2	
43	Wolves		Change harvest mgmt. strategy (to within a population range vs. not to exceed 20% of the unitwide, pre-season population estimate)	2	
44	Wolves		Extend the trapping season on state and private lands to align with the starting date for wolf trapping season on federal land.	2	



Unit 1B and 3 - Petersburg and Wrangell Areas

45	Deer		Extend hunting season for residents on Mitkof, Woewodski, & Butterworth Island	3	
46	Deer		Extend hunting season for residents on Kupreanof Island	3	
47	Elk		Change harvest mgmt. strategy (to within a population range vs. not to exceed 20% of the unit wide, preseason population est)	1 - 3	
48	Brown Bear		Change the bag limit (from 1 to 4 bears every regulatory year) and open a fall season (Sept. 15 - Dec. 31)	3	
49	Black Bear		Increase "up to number" for drawing permits (DL029) for nonresident hunters without a guide on Kuiu Island	3	
50	Black Bear		Increase "up to number" for drawing permits (DL030) for unguided nonresident hunters on Kupreanof Island	3	
51	Black Bear		Modify the sealing requirement for nonresident hunters	3	
52	Black Bear		Repeal the shorter harvest reporting and sealing requirements for nonresidents on Kuiu Island	3	
53	---		Modify the hunting area description within the Petersburg Mgmt. Area	3	



Submitted By
John Neary
Submitted On
12/20/2018 5:50:12 PM
Affiliation

Phone
9073218555

Email
john.neary99@gmail.com

Address
17735 Pt. Stephens Rd.
Juneau, Alaska 99801

I oppose proposal 23 that would open up goat hunting on Juneau ridges to archers. Goat hunters deserve to have opportunity to hunt, but not where they may impact local goat populations as ADF&G biologists fear could happen with this proposal.

The ridges above Juneau have been closed for a long time and yet the population of goats has not grown. This is likely related to factors that aren't human-caused, but given these natural pressures it is wise to be cautious about expanding the potential take of goats.

In addition the Juneau ridges are extensively used by hikers and wildlife watchers in the areas proposed for the expanded archery hunt. The Mount Bullard Closure, for example, has existed since 1962 and serves to maximize opportunities for viewing goats from the Visitor Center and lake. Other ridges have infrequent or variable populations of goats that are occasionally sighted by hikers, each sighting is considered a unique and rare event, not at all dependable. We should manage this resource for increased goats, not reductions.

Thanks

John Neary



Submitted By
Nicholas Orr
Submitted On
12/26/2018 3:49:56 PM
Affiliation

I am writing in support of proposal 3. I realize that there are going to be some people that claim the ribs to be their favorite part of the deer. However there are several reasons I believe this proposal should become part of regulation. One, there is minimal meat on the ribs, so making salvage optional wouldn't in much waste. Two, a lot of hunters, especially in the ABC islands, are using large caliber rifles due to brown bear presence, resulting in baseball-sized exit wounds. This means a pretty significant portion of the rib meat is already either missing or contaminated with lead / bone fragments. Three, there is a growing body of evidence indicating that game shot with lead bullets – the most common kind – often has elevated levels of lead in the flesh surrounding the bullet wound. X-rays of harvested game animals have shown that area immediately surrounding where the animal was shot have the highest levels of lead. ADF&G states that the best shot placement on big game is through the heart-lung area, which means hunters using lead bullets are being forced to salvage meat containing significant amounts of lead. A simple internet search of 'lead in game meat' will show many pictures and provide more information on this issue. Four, hunters in the ABC island area have to deal with brown bears and ADF&G advises hunters to "be alert" while field dressing deer. If only one hunter can avoid a bear encounter by not having to salvage the minimal meat on the ribs, it's worth it.

I would like to add that I wrote in the proposal that there is between 2-5lbs of meat on deer ribs total. This is incorrect; I shot a large mature buck in the alpine this year and I was able salvage ~1lb of 'meat' – a large portion of what was salvaged includes gristle, fat and connective tissue. I know this because I weighed the salvaged meat on a scale once I left the field. The heart, the diaphragm (the part of the animal separating the chest cavity from the abdominal cavity), and the flanks (the part of the animal supporting the stomach/intestines) have a comparative amount of meat, yet they are not required to be harvested.

To summarize: (1) there isn't much meat on the ribs and what meat there is often damaged by high caliber rifle bullets; (2) shooting deer in the ribs – as advised by ADF&G – with commonly used lead bullets spreads lead fragments throughout the ribcage; and (3) not having to salvage the minimal meat from the ribs will lessen the chance of having an unpleasant bear encounter.

Submitted By
Nicholas Orr
Submitted On
12/27/2018 9:49:40 AM
Affiliation

I am writing to support the passage of proposal 22. Limiting the take of wolves on Douglas Island for a population that freely moves back and forth between the mainland and the island has the effect of creating a wildlife preserve for wolves. Wildlife preserves generally occur when there is either a biological concern about a population or a significant public interest in viewing wildlife that are easily observable. Wolves on Douglas Island meet neither of these criteria; the ADF&G has stated no concern about the wolf population in Unit 1C and wolves in southeast Alaska are not an easily observable animal due to their reclusive nature and dense forest. I would like to point out that Douglas Island is heavily utilized by Juneau deer hunters as it is the only area with a significant deer population that doesn't require a boat to access. Maintaining a wildlife preserve/sanctuary for wolves on Douglas Island forces hunters without boats (i.e. generally lower income hunters) to suffer the consequences of such a regulation (a reduced deer population). Finally, Alaska has plenty of wildlife preserves / parks – we don't need to go around creating more unnecessarily.

Submitted By
Nicholas Orr
Submitted On
12/27/2018 12:06:17 PM
Affiliation

I am writing to comment in support of Proposal 18. Increasing the bag limit for deer from 4 to 6 deer would essentially increase opportunities for Juneau hunters in the area of Unit 4 around Juneau. Changing the bag limit would likely not impact other communities in Southeast Alaska due to their relatively large distances from Juneau, especially when considering marine weather and the short days in November / December when most of the deer hunting effort takes place. As I stated in the proposal, many Juneau hunters are limited to the area between Pt Arden and Pt Retreat due to consistent unfavorable marine weather in these areas. Finally, I would like to point out that ADF&G stated in their latest Species Management Report that "the division should assist the 2 regulatory entities [Federal Subsistence Board & Alaska Board of Game] in standardizing deer hunting regulations." This proposal would standardize deer regulations in Unit 4.



Submitted By
Nicholas Orr
Submitted On
12/27/2018 1:41:31 PM
Affiliation

I am writing in support of Proposal 4. I personally have never shot a deer on the beach, but I object to Southeast Alaska having different regulations for no discernable reason. Any issues that might pertain from shooting from a boat in Southeast Alaska also pertain to all the other units in Alaska. Southeast should be no exception. I participated in the Juneau Advisory Council discussion on this issue and no one could remember why or when this regulation was passed in the first place. I think some people are against the proposal simply because it is different, from their perspective, from what they are used to. I would add that hunters often complain about the complex nature of hunting regulations. This proposal would be a step towards simplifying the regulations and creating uniformity throughout the state.

Submitted By
Nicholas Orr
Submitted On
12/27/2018 1:55:36 PM
Affiliation

I am writing to comment against Proposal 13. There is currently no regulation in the remainder of the state requiring ID tags for traps and snares and there is no reason to implement this in southeast only.

Submitted By
Nicholas Orr
Submitted On
12/27/2018 2:00:26 PM
Affiliation

I am writing to comment against Proposal 14. There is currently no regulation in the remainder of the state requiring ID signs for traps and snares and there is no reason to implement this in southeast only. Furthermore, there is a small but active percentage of the public that seeks to actively disrupt trapping and signage would serve as an invitation for those people to steal traps and otherwise interfere with lawful trapping.

Submitted By
Nicholas Orr
Submitted On
12/27/2018 2:10:42 PM
Affiliation

I am writing in support of the version of proposal 20 supported by the Juneau Advisory Committee (4 deer, bucks only). The proposal as originally written – 4 deer, only one of which may be a doe – is essentially unenforceable. A hunter would need to be contacted multiple times by AWT in order for them to determine whether a hunter had shot more than one doe. Given the impact that wolves have had on the Douglas Island deer population, this is a necessary step towards rebuilding the population.



Submitted By
Jon Pond
Submitted On
12/24/2018 8:50:28 AM
Affiliation
Juneau Resident

Phone
907 723 9097
Email
jpgk@gci.net
Address
640 Hemlock
Juneau, Alaska 99801

December 24 ,2018

Open letter to The Board of Game for the January 11-15th scheduled Meeting:

My name is Jon Pond. I have lived and worked in Juneau and throughout Alaska for the past thirty-five years. I have enjoyed duck and deer hunting in Southeast Alaska. I have worked as a part time river/fishing guide in Alaska floating many of the rivers in Southwest Alaska and The Brooks Range.

I Appreciate the Board having its scheduled meeting in Southeast Alaska and the opportunity to give my personal input on three key proposals in Unit 1-C that will directly impact our area.

Proposal #22:

I oppose proposal # 22 because wolves are an integral part of our archipelago including Douglas. They have shown no negative impact on the local deer or domestic animal populations and provide the balance needed to maintain a distribution of healthy animals .To have an opportunity to see or hear a wolf on Douglas or anywhere, is a true Alaskan experience enjoyed my many. To trap out (again) the small existing population of the Douglas wolves is to eliminate the sense of true wilderness Douglas can provide for all users. Plus, it's good animal conservation.

Proposal #23:

I oppose proposal #23 because I remember when there were no mountain goats on our ridges around Juneau. They were hunted out years ago. I remember the small local effort funded both in energy and personal monies to reintroduce the goats to the ridges where they naturally belonged for all to see again. The herd has done well over the past 20 years. To walk Perseverance trail or hike the ridges or even look up from your porch or office window and see goats naturally positioned high on the ridges is a special opportunity especially given it is so close to town. Just the tourists who appreciate the splendor make many times over the initial value. The area is better used for viewing and non-consumptive users. Hunting Goats is offered in numerous and more remote drainages accessed on the road system.

Proposal #28:

I oppose baiting Black Bears in the Juneau area for hunting. It is just not smart. The last thing we want to do is to habituate our local black bears to human food. I have had a bear in my kitchen. I opened my front door this year greeted by a black bear.

One was eating on my deck one evening this year from the bird feeder for lack of berries and salmon. We have a chronic bear garbage problem in Juneau and the community works hard at trying to keep them on natural foods and not our garbage. Once they are habituated to garbage, their chances of being destroyed are greater and to be hunted with bait only compounds the issue and is frankly, poor hunting ethics in this part Alaska.

Jon Pond
640 Hemlock St
Juneau, Ak. 99801



Submitted By
Anne Post
Submitted On
12/17/2018 2:27:24 PM
Affiliation

Phone
907-209-5393
Email
ken.annepost@gmail.com
Address
17395 Point Lena Loop Rd
Juneau, Alaska 99801

I oppose Proposal 23 which would open more areas around Juneau to goat hunting. Anecdotal information provided by one hunter that there are enough goats to expand the hunt is not scientifically based nor statistically valid for making this decision. In addition, the goats in the proposed expanded area provide wonderful viewing opportunities for thousands of visitors and locals at the Mendenhall Visitor Center, Mendenhall Recreation Area and from many trails around Juneau. Their experience is enhanced by viewing goats on those surrounding peaks all year round. The current regulations already provide good opportunity for goat hunters.

The author of Proposal 23 also claims that hunters get confused about the hunt boundaries and uses that as a reason to expand the hunt area. ADF&G Proposal 24 clarifies the boundaries for the current goat hunt in Unit 1C and should help alleviate that concern without expanding the area open to goat hunting.

Thank you for the opportunity to comment.

Submitted By
Anne Post
Submitted On
12/28/2018 9:25:38 AM
Affiliation

Phone
9072095393
Email
ken.annepost@gmail.com
Address
17395 Point Lena Loop Rd
Juneau, Alaska 99801

PROPOSAL 14 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.

I support this proposal.

I am not opposed to trapping but I hike frequently with dogs on and off trails in the Juneau area and would greatly appreciate signage that tells me there are traps in the area. Thank you.

Submitted By
Anne Post
Submitted On
12/28/2018 9:14:29 AM
Affiliation

Phone
9072095393
Email
ken.annepost@gmail.com
Address
17395 Point Lena Loop Rd
Juneau, Alaska 99801

I support **PROPOSAL 13 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions**, which would Require identification tags for traps and snares in Units 1–5 .

I am an avid Juneau hiker and would feel much safer if these requirements were enacted.

Thank you for the opportunity to comment. - Anne Post



Submitted By
Kimberly Raum-Suryan
Submitted On
12/26/2018 11:33:05 PM
Affiliation

Phone
907-500-7306

Email
kraumsuryan@gmail.com

Address
10752 Mendenhall Loop Rd.
Juneau, Alaska 99801

PROPOSAL 13

5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.

SUPPORT - Require identification tags for traps and snares in Units 1–5.

I support the recommendation to reinstate trap tag requirements in Unit 1-5 whereby trappers are prohibited from using a trap or snare unless the trap or snare has been individually marked with a permanent metal tag upon which is stamped or permanently etched with a trapper's identification number. This is just good common sense. Crabbers and fishermen have to mark their gear with identification numbers when the gear is left alone and there is no reason that traps or snares left unaccompanied should be any different. By marking traps and snares, the trapper can be contacted if a non-target animal is caught in the trap or snare. Moreover, if the traps or snares are left out when trapping season is closed, troopers can contact the trappers to remove their traps. By being good stewards of Alaska and trapping legally and ethically, all users of public lands can be assured that Alaska is a leader in handling the rights of all Alaskans. Thank you.



Submitted By
Maryann Ray
Submitted On
12/17/2018 7:46:06 PM
Affiliation

Phone
907-4190874
Email
iamsria@gmail.com
Address
9633 Kelly Ct
Juneau, Alaska 99801

Re: PROPOSAL 13 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.

I'm writing to request the reinstatement of the requirement for traps and snares carry a permanent mark identifying their owners. Our wilderness areas are shared by hunters, trappers, hikers, pets, and children. We've had situations where pets and other creatures have been unintentionally trapped, there have been traps misplaced in areas where pets and children play, and working snares have been found out of season.

There is no way to hold people accountable for their traps and snares if they aren't marked and accountability is required to ensure seasonal and other restrictions are properly maintained. Please reinstate the thr requirement for permanent identificatio to be placed on all traps and snares.

Thank you,
Maryann Ray



unapologetically **FOR ALASKAN RESIDENTS**

PO Box 60095, Fairbanks, Alaska 99706 (907) 371-7436
email info@residenthuntersofalaska.org web www.residenthuntersofalaska.org

December 27, 2018

Comments to Alaska Board of Game
Region I Southeast Meeting – Petersburg
January 11-15, 2019

Proposals we support: 8, 9, 31, 40, 49 & 50 (as amended)

Proposals we oppose: 37

Proposal 8 – 5AAC 85.015 Hunting seasons and bag limits for black bear

SUPPORT

This is a RHAK proposal, based on our firm belief that the legislature never intended for the **Board of Game to create new “must be guided” (MBG) species for nonresident U.S. citizens** beyond what is required by AS 16.05.407. **The Board claims that it hasn’t created or added to the MBG species outlined in statute, rather it has created new “must-be-guided species hunts” in specific areas of the state.**

AS 16.05.407 is Alaska’s unique and one-of-a-kind “must be guided” law among all the other 50 states that makes it unlawful for a nonresident U.S. citizen to hunt grizzly/brown bear, Dall sheep, or mountain goat, unless that person hires a licensed big game guide or hunts with a resident relative within 2nd degree of kindred. Note that the statute does not give a preference to the nonresident guided hunter over the nonresident hunting with a resident relative, or vice-versa; both are equal under the law. The rationale for the law is that brown bears are dangerous, and the terrain sheep and goats inhabit is dangerous, and **field judging of legal animals is difficult, thus someone who doesn’t live in the state should be required to hunt with a guide or resident relative.**

When there are conservation concerns for any big game population – as there was with black bears in Units 1-3 in 2010 – and nonresidents are taking the majority of the harvest, the solution is to limit all nonresidents equally to draw only hunts, not to create a new MBG species for that particular hunt and give a preference to guided nonresident hunters. That is a slippery slope that always seems to negatively affect resident hunters.

What the board did in 2010 was to use ADFG data that showed that most of the nonresident black bear **harvest was from “unguided” hunters, but the data did not say anything about the 2DK hunters.** The 2DK hunters who hunted with a resident relative should be considered **“guided.”** The majority of the black bear harvest went to those nonresidents hunting without a guide or a resident relative.

Why then does the board discriminate against the nonresident hunting with a resident relative when they impose a new must-be-guided species hunt? Again, under AS 16.05.407,



the nonresident guided hunter and the nonresident hunting with a resident relative within 2nd degree of kindred are equal. **They are both technically "guided" hunters.** Why does the board choose to negatively affect residents who want the same opportunity to hunt with their nonresident relatives, by giving a preference to only the **"guided" nonresident** hunters hunting with a licensed guide?

At the very least, if the board does not approve our proposal, and certain black bear hunts in SE Alaska units **remain "must-be-guided," we ask to consider allowing nonresidents** hunting with a resident relative within 2nd **degree of kindred to be part of that "guided" pool** of hunters and be given the same general hunt opportunity outside the draw permit requirement.

Proposal 9 – 5AAC 85.015 Hunting seasons and bag limits for black bear

SUPPORT

We support removing the "must-be-guided" (MBG) requirement for nonresident black bear hunters in units 1B, 1C, and 1D, and going to general season hunts for all nonresidents, however we would like to see the MBG requirement removed for the rest of Units 1-3. Alternatively, see our comments on Proposal 8, to recognize that a nonresident hunting with a resident relative within 2nd **degree of kindred also be recognized as a "guided" hunter.**

Proposal 31 – 5AAC 92.550 (1)(F) Areas closed to trapping

SUPPORT

The original intent of the setbacks which prohibited trapping within ¼ mile of these trail areas around Juneau was concern for domestic dogs getting caught in traps. Subsequently **there was allowance to set traps with a jaw spread of 5"** or less as long as they were 50 yards off the trail and elevated at least five feet above the ground/snow.

Since the trapping restrictions took place, there has been an increase in nuisance beavers, which trappers have not been allowed to trap within ¼ mile of the trail. This proposal seeks to allow trapping for beaver and other water species as long as the trap is fully submerged and 50 yards from the trail.

Makes sense, protects domestic pets from getting caught, allows more harvest of nuisance beavers and more opportunity for local trappers.

Proposal 37 – 5AAC 92.108 I identified big game prey populations and objectives

OPPOSE

The Department at this time has not submitted its Analysis & Recommendations on their Proposal 37, which makes it difficult to provide more informed comments. However, based on the proposal, we find it odd that if the Department is concerned about carrying capacity for deer in Unit 1A, and that the Intensive Management harvest objectives of 700 deer will not be reached in future, why not also recommend to lower the population objective, which is currently 15,000 deer?

Both the population and harvest objectives of any identified big game prey population under



IM law should reflect current trends, carrying capacity etc., so we know when to conduct mandatory IM predator control efforts on these identified populations.

Proposal 40 – 5AAC 85.030 Hunting seasons and bag limits for deer

SUPPORT

We agree that nonresident bag limits beyond two deer are not in the best interests of resident deer hunters or the deer population.

Proposal 49 and 50 – 5AAC 85.015 Hunting seasons and bag limits for black bear

SUPPORT as amended

The Department is asking to increase the number of black bear draw-only permits to **nonresidents hunting "without a guide"** for Kuiu and Kupreanof Islands. (See our comments on proposals 8 & 9.) There is no reason to incorporate nonresident hunters who hunt with a resident relative within 2nd **degree of kindred as "unguided" hunters under the current permit system. Why not just change the definition of "guided" to include the nonresident hunters who hunt with a resident relative within 2nd degree of kindred.** That would allow the same unlimited opportunity for that class of nonresident hunter, and allow residents the opportunity to go hunt black bears with their nonresident relatives without having to go through a draw permit process. The 2DK nonresident component should never have been restricted to draw-only hunts as it is the truly unguided nonresident black bear hunters who were taking the majority of the harvest.

Thank you to Board of Game members for your service, and Board Support and Agency staff!

Resident Hunters of Alaska (RHAK)
www.residenthuntersofalaska.org



Submitted By
Jesse Ross
Submitted On
12/9/2018 11:13:27 PM
Affiliation
ATA , local trapper, sportsman

Phone
907 321 3174
Email
ross_jesse@hotmail.com
Address
5980 Lund st
Juneau, Alaska 99801

Proposal 8 I fully support this. i feel as though the guide industry has sneakily tried to hijack the black bear hunts in southeast for non residents. this is an allocation issue between resident and non residents. I love black bear hunting and take 2 most years.. the RHO of AK are spot on when they say, " the legislature never intended the BOG to create a new must be guided species beyond brown bear, sheep and mountain goat without legislative approval" this sets a bad precedence if not dealt with.

Proposal 11 I support this wholeheartedly as a trapper due to late springs, such as Spring 2018 when ice on most beaver ponds didnt melt til around May 1. Hides are still prime, Beaver arent a species of concern

Proposal 13 I am against this proposal, I have had gear stolen with my trap tag on it and it ended up in a closed area and i had to prove to troopers my gear was stolen. this will be abused by anti trappers and doesnt help in enforcement, unless there is a venue for trappers to officially report stolen gear to.

Proposal 14 As a trapper I am opposed to this...might as well put a giant billboard at your traps or snares and advertise, could be unconstitutional, creates litter in the wild, Juneau douglas AC opposed this as well. In Jan 2018 I had 3 trap signs made from recycled political signs stating "active trapping area" " traps ahead", stolen from my trapline in the Juneau area...proving no good can come of this.

Proposal 19 I support this wholeheartedly, needs troopers to sting some people. its a huge safety issue, would be sad to see a hunter or miner killed if nothing is done

Proposal 20 I oppose this, this is a management debacle caused by the Douglas island management plan and the increase of wolves, this wont be needed if the wolves are managed like they are in the rest of the state...see Proposal 22

Proposal 22 I support this...why is the Dept managing wolves in small localized areas?? Need to manage them like the rest of the state does. the Douglas management plan takes away allocation from trappers and hunters and needs to be stricken from regulation.

Proposal 23 I support this as amended by the local AC. Goats arent just for viewing and I am appalled that the sportsman played an integral part in getting them transplanted to the immediate local Juneau area in the 80s yet cannot hunt them.

Proposal 28 I Fully support, Dept states they wont issue a permit for baiting, where is this in regulation, statute??? this could be a great tool for ADFG to lawfully remove problem bears from the Juneau area...Not enough local area bears are being harvested, so they come into town, and get shot by LEOs and placed in dump. Please Allow hunters to do their part. please treat 1c like the rest of the state! This is constitutionally mandated!!!!

Proposal 30 I support as amended...give kids the First Saturday of opening season....

Proposal 31 I support, Local trappers organization can help with education of new trappers to see that problems dont arise. Juneau has THE STRICTEST trapping regulations and setbacks in the state. Lotsa beaver ponds could be trapped, but arent due to this regulation, this would give trappers a little more room. Local AC supports as well.

proposal 32 I oppose this very strongly. Locals on city council are against trapping. This aims to oust trappers, all user groups need to share the trails in this small area. Unconstitutional allocation issue, do elevated sets, but kicking out a user group isnt playing fair

Thank you for your time and efforts in caring for Alaskas game resources!!

Regards,

Jesse Ross



Submitted By
Jesse Ross
Submitted On
12/9/2018 10:07:39 PM
Affiliation

Phone
907 321 3174
Email
ross_jesse@hotmail.com
Address
5980 Lund St
Juneau, Alaska 99801

Proposal 22 Comment in Support

I fully support this proposal. I authored this proposal because as a sportsman I care about healthy game populations of both deer and wolves. This outdated management Plan was created in 2002, (it is 16 years old) after 2 trappers caught 7 wolves on the backside of Douglas island. The media learned about this and concerned citizens went to the Dept. and they ultimately wanted the entire island to be a refuge free from hunters and trappers. The Douglas island management area plan resulted and was a compromise by the dept to all parties. In the last 16 years the wolf population on Douglas and the Juneau area has increased and the deer population has decreased. I find it frustrating as a trapper to see the Dept set an arbitrary number of allowable animals to be harvested (allocation of wolves) in an area where they have zero (0) scientific or biological data estimating the local wolf population., yet rely on anecdotal info from word of mouth and social media sites and general science models to estimate how many wolves are on the island. Yet sightings have increased, deer hunter success has been dismal and the Dept. continues to limit the taking of apex predator in this area. ADFGs deer pellet surveys in the past years showed that when wolves were trapped , the deer population increased. I respect many of the ADFG staff and am friends with several of them, they have a tough job to manage Alaska's resources. I am not against any of them, just this 16 year old poor management plan for Douglas's wildlife. In the 2017, 2018 trapping season after a recent fresh snowfall i found fresh wolf tracks....on the north end of Douglas i found a pack of atleast 7 wolves traveling north, at the south end i counted 6 distinct sets of wolf tracks heading south. Biologists say that the size of the island can only support one pack of wolves. I must disagree with this model, as the wolves can easily travel between the mainland at low tide or swim across the small channel ways. Furthermore , if this Plan is left in place, i feel it would be a travesty to allow Alaskas wolves to be managed in such a way as to only allocate so many animals to be taken in a small area for such a wide ranging predator. I love wolves, they have a place in nature and so do I. I also realize that as a trapper I play an important role in predator management and see wolves for what they are....an apex predator. As you know, wolves are survivors and very tough to trap, the Douglas island management needs to be stricken from regulation so that trappers can do their part in the circle of life, The Juneau Douglas AC supported this proposal as well. Thank you for standing tall for Alaska's Game resources.

Submitted By
Jesse Ross
Submitted On
12/27/2018 10:51:08 AM
Affiliation

Phone
9073213174
Email
ross_jesse@hotmail.com
Address
5980 lund st
Juneau, Alaska 99801

Proposal 22 i support this proposal because it's manages Wildlife for all user groups. Keeping it the way that it was it excludes Trappers and hunters and the deer population has obviously suffered on Douglas because the Wolves know that there are a lot of deer there. Why are we micromanaging an island without data backing up how many wolves are actually there. Furthermore the biologist decided to alter the quota system from five walls to three wolves. Their reasoning was that it was a board of game here and they didn't want to bring unnecessary attention to the issue. This is just plain garbage. That is an unconstitutional move because it puts Trappers and Hunters who would like to harvest a wall and there are plenty of them on the island out of the equation. Adfsd Mission states to manage all resources to maximum sustainable yield for all user groups not just a certain group such as Wildlife viewers.



From: Frank Rue
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Southeast Alaska BOG Proposals
Date: Tuesday, December 25, 2018 5:53:33 AM

My name is Frank Rue, my residence is 7083 Hendrickson Rd, Juneau Alaska 99801.

I have lived and hunted in Alaska since 1977. I am an avid deer hunter and have harvested many deer from Douglas Island, Admiralty Island and Chichigof Island over the years.

I have comments on three of the proposals being considered at the Petersburg BOG meeting scheduled for January 2019.

PROPOSAL : #22, REMOVE HUNTING QUOTA ON DOUGLAS ISLAND WOLVES.

OPPOSE – I hunt deer on Douglas Island. I have enjoyed seeing wolf sign while hiking and skiing on Douglas. I like to know there are wolves on Douglas. I do not support eliminating the Douglas Island Management Area in GMU 1-C and removing the annual 3 wolf harvest quota for the island. I feel that reasonable numbers of wolves have a place on Douglas island, and that the public is well served to know that the island is wild, has wolves and that there is a chance that wolves can be seen and enjoyed by all who venture out into the wilderness. Please keep the 3 wolf harvest quota in place on Douglas Island. It does not need to be changed.

PROPOSAL #23: ALLOW ARCHERY HUNTING OF MOUNTAIN GOATS ON MT JUNEAU AND NEARBY AREAS

OPPOSE – I strongly oppose additional archery hunting of mountain goats on Mount Juneau, Mount Roberts, and the entire Juneau area from Mendenhall river/glacier to Taku river/glacier. My family, and many Juneau residents and visitors, hike the ridges in the new proposed hunting areas. One of our greatest pleasures is to see mountain goats. We are very fortunate to be able to see goats along the Juneau road and trail system. Unlike Alaska's more remote goat areas, our local goats see summer hikers in close proximity and do not run away. The Mount Juneau area goat population is better used for wildlife viewing and non-consumptive enjoyment of goats without additional



pressure from hunting. The value of goats for viewing for thousands of local Alaskans and summer visitors is of greater value than the opportunity for a few people to take a goat. There are other hunting areas around Juneau that are more remote that can accommodate goat hunters. Please do not change or increase the current mountain goat archery areas in Juneau.

PROPOSAL #28: ALLOW BEAR BAITING IN JUNEAU

OPPOSE: I strongly oppose allowing in the Juneau area (1C) any black bear baiting at bait stations. Juneau has bears in all its neighborhoods and, in the past, Juneau has had a very serious problem with bears getting into garbage. Juneau has a strong garbage ordinance with serious fines for those who do not protect their garbage from bears. This ordinance has helped reduce the number of garbage bears and conflicts between bears and humans in Juneau. Allowing bear baiting will undermine Juneau's efforts and cause more bears to become accustomed to human food. Bears conditioned to human food will lead to more bear-human conflicts. Luring bears to bait stations with human food seems like a bad policy in Juneau. I oppose this change.

Thank you for considering my comments.

Sincerely,

Frank Rue

7083 Hendrickson Rd

Juneau, Alaska 99801

frankrue44@gmail.com



From: Sally Rue
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Comments for Southeast AK Board of Game Meeting Jan. 11-15, 2019
Date: Wednesday, December 26, 2018 3:03:25 PM

Dear Board of Game Members,

I am a long-time Alaska resident who has held a sport hunting license since 1977. I have the following comments on proposals that you will address at your upcoming January, 2019 Petersburg meeting.

Proposal #22: REMOVE HUNTING QUOTA ON DOUGLAS ISLAND WOLVES

Oppose

I have hunted on Douglas Island, and I appreciate that people value healthy populations of deer there. However, I also prize the presence of wolves and the occasional opportunity to run across wolves or wolf sign. I remember the thrill of fresh wolf tracks when skiing in the Hilda Creek drainage a couple years ago. That is a memory that I will hold for many years. The current regulations allow for some take of wolves, and still provide adequate deer hunting opportunities in my view. Please do not adopt this proposal.

Proposal #23: ALLOW ARCHERY HUNTING OF MOUNTAIN GOATS ON MT. JUNEAU AND NEARBY AREAS

Oppose

I remember when you could not see any goats on Mt. Juneau, Mt. Roberts, and other nearby ridges. I love that today I can hike up the valleys or on the ridges and have a decent shot at viewing these magnificent animals because a small group was re-introduced by ADF&G with the support of local volunteers. I actually feel a little proprietary when I see goats there, having made a monetary donation to the re-introduction effort back then. I know how much my family, friends, and visitors to Juneau value the opportunity to see wild goats so close to town. I do not believe that allowing archery hunting in this area makes any sense. It might benefit a few bow hunters, but at the expense of thousands of residents and visitors to our region. The value of these goats to non-consumptive users far outweighs the potential value to a few hunters. Even if the population stayed at healthy levels, the goats would disappear from easy viewing. Tourism is a huge benefit to Juneau and Alaska, and viewing wildlife is one of the biggest draws for tourists and their dollars.

I strongly oppose this proposal. Allowing hunting of goats on Mt. Juneau and nearby areas would negatively impact thousands of residents and visitors. There is no valid reason to change the current status.

Proposal #28: ALLOW BEAR BAITING IN JUNEAU

Oppose

I strongly oppose opening the Juneau area (GMU 1C) to black bear baiting at bait stations. Juneau has a longstanding garbage bear problem, and allowing use of human food to bait bears



would only exacerbate the problem. Our community, and we as residents, have gone to great lengths to address it. I remember a year when ADF&G and the Juneau Police Department had to destroy 14 bears because they had been habituated to garbage. That was distressing and felt like a failure of responsibility on the part of Juneauites. The City Assembly enacted ordinances to alleviate the problem, and they have been enforced over the years and have led to a substantial reduction in the problem. Allowing a relatively few people who might wish to 'hunt' using bait stations in Juneau's densely populated area would damage our efforts as a community to avoid habituating bears to human foods and increase the danger of bear-human conflicts.

In addition, as a hunter, I find using baiting stations to be a violation of fair chase ethics.

Thank you for considering my comments.

Sincerely,

Sarah Rue
7083 Hendrickson Rd.
Juneau, AK 99801



Submitted By
Michael Sakarias
Submitted On
12/26/2018 1:23:03 PM
Affiliation

I have lived in Alaska since 1979, in Juneau since 1982 and on Douglas Island since 1997. I have some comments on a few proposals under consideration by the Board.

PROPOSAL : #22, REMOVE HUNTING QUOTA ON DOUGLAS ISLAND WOLVES by Jesse Ross

I strongly oppose this proposal.

I well remember the outrage when a trapper managed to kill all of a wolf pack on West Douglas Island. I was appalled, and still am. I have seen wolves and heard wolves howl on a kayak trip into Endicott Arm. But, after more than 20 years living on North Douglas Island, hiking and kayaking around on North Douglas Island, I have never heard or seen wolves. They do not appear to be numerous. While I think the current regulation is insufficient to allow for what I consider a reasonable number of wolves to reside on Douglas Island, changing to no limit to the wolf hunting quota I view as abhorrent. I request that you vote do reject Proposan #22

PROPOSAL #23: ALLOW ARCHERY HUNTING OF MOUNTAIN GOATS ON MT JUNEAU AND NEARBY AREAS by Jake Abbott

I have lived in Juneau long enough to be around when there were zero mountain goats in at least parts of the hiking accessible mountains around Juneau. I remember the work to reintroduce goats. I have had the thrill of seeing mountain Goats close up on hikes, and of getting to thrill visiting friends with that same experience. If goats must be hunted, let that be in locations not so easily accssible to residents and visitors on the Juneau trail system. Please reject this proposal.

PROPOSAL #28: ALLOW BEAR BAITING IN JUNEAU by Jake Abbott

I nearly gagged when I read this proposal. This person wants to be allowed to bait bears? I do not hunt, any more, and have never hunted bear. But, the desire to bait bears in order to kill them more easily seems a bit depraved, to me. Maybe the next proposal will be for fenced hunting parks, where one can shoot from the comfort of one's car. Please reject this proposal.

Thank you for considering my comments. Respectfully, Michael Sakarias, Juneau Alaska



Submitted By
Katharine Savage
Submitted On
12/20/2018 2:33:20 PM
Affiliation

Phone
907-957-2230
Email
dock_savage@msn.com
Address
421 West 10th St
Juneau, Alaska 99801

To the Members of the Board of Game:

I am writing in favor of Proposal 13, 5 AAC 92.095., Unlawful methods of taking furbearers; exceptions. which would reinstate the requirement for traps to be labeled with identification tags in Units 1-5.

As a veterinarian and wildlife biologist, I am familiar with the concept of humane treatment of animals as well as most trapping methods on a professional level. My husband is from Southeast Alaska and trapped a variety of furbearing mammals throughout his youth, so I am also familiar with trapping on a more personal level. I know trapping can be done in a humane fashion. I also know trapping can be done in an inhumane fashion. The Trappers Code of Ethics, as stated in the ADFG/Alaska Trappers Association Trappers Manual, includes regular checking of traps as well as trapping in the most humane way possible. I believe that requiring trapper accountability through the use of identification tags on traps will foster both of these practices. When trappers do not adhere to the Code of Ethics, the animals suffer, the profession suffers, and the industry suffers. Requiring ID tags on traps is an important added measure of assurance that trappers will be held accountable for their traps and that the Code of Ethics will be followed. Furthermore, it is likely that the ID tags will only be used in cases of irresponsible behavior; if responsible trappers follow the ADFG guidelines of setting traps away from human activity and check their traps regularly, then the identification tags should not require inspection.

Sincerely,
Kate Savage, DVM



Submitted By
Sally Schlichting
Submitted On
12/25/2018 3:11:23 PM
Affiliation
Juneau resident

Phone
9079573488
Email
sally.schlichting@gmail.com
Address
419 Kennedy Street
Juneau, Alaska 99801

I am commenting on three board of game proposals. These are:

PROPOSAL : #22, REMOVE HUNTING QUOTA ON DOUGLAS ISLAND WOLVES

Comment: I am cautiously supportive of a limited quota on wolves on Douglas Island to allow recovery of the deer population for area hunters who enjoy the Douglas Island area as an accessible hunting ground, especially for young and new hunters. However, it goes without saying that wolves are an important part of the ecosystem and I am vehemently opposed to any attempt wipe them out from Douglas as has occurred in the past. I am very concerned that the ADFG does not do any significant monitoring or enforcement, but rather relies solely on "self-reporting" to ensure that hunters aren't illegally taking wolves and hiding the carcasses. I support prosecution and stiff penalties for such violations in order to deter illegal killing. I am a lifelong Juneau resident and though I am a near daily hiker, I have yet to see a wolf and I would love to. These creatures are of value to me as a wildlife species and I want the opportunity to see one to be preserved.

PROPOSAL #23: ALLOW ARCHERY HUNTING OF MOUNTAIN GOATS ON MT JUNEAU AND NEARBY AREAS

Comment: I strongly oppose archery or other hunting of mountain goats anywhere on Mt. Juneau or Mt. Roberts. The population of mountain goats on these two mountains are a huge source of enjoyment and wonder for me, visitors, and countless other Juneau residents and recreators who use the Mt. Roberts, Mt. Juneau, Perseverance, and Granite Creek trails. These trails are heavily used throughout all months of the year, as can be attested to by the camper I encountered coming down Granite Creek in mid-November this year after she spent the night on the Mt. Juneau Ridge; by the many headlamp lights I've seen on any given evening in the winter coming down Mt. Roberts; and by the dozens of hikers and ridge runners weekly accessing the Mt. Juneau ridge throughout the spring, summer and fall months. We all find huge enjoyment in watching the mountain goats, which are a treasure of this area. Having them hunted with so many other users/recreators present puts people at risk but also spoils the experience of recreators. I urge the Board of Game to reject this proposal. I support the taking of mountain goats in other locations in the borough, such as Mt. McGinnis, Stroller White, and Mt. Bullard.

PROPOSAL #28: ALLOW BEAR BAITING IN JUNEAU

Comment: This is simply a ghastly proposal that has no place in the tradition of fair-chase hunting or as a practice by any self-respecting hunter. Bears are already a danger to Juneau residents, children, and pets through improperly stored garbage and baiting will make the situation even worse. I am completely opposed to bear baiting and I urge the board of game to reject this proposal.

Thank you for the opportunity to comment.



From: Lynn Schooler gmail
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Proposal #23 comment
Date: Wednesday, December 26, 2018 4:21:00 PM

I have reviewed the proposal before the board to open Mt. Juneau and the closed area immediately around Juneau to archery hunting for mountain goats and must ask the board to NOT accept this proposal. There are many reasons I ask this. When I first moved down to Southeast from the Kenai Peninsula in the early 80s, there were very, very few goats in that area, and it was extremely unusual to see one. The native goat population in the mountains above Juneau had been nearly eradicated by market hunters in the early years to feed the miners. Goats were only reestablished there by a joint state/private effort, using state and private contributions and state biologists to transplant a few goats up from Misty Fjords. The population grew until now it is common to view goats on the sunny slopes right above downtown and from the trails and housing developments in the valley during certain seasons. (I mention all of this here in part because I know that there is no one from Southeast on the current board, so perhaps not all the board members may be aware of the history of the present herd, or know about the effort and expense it to make goats a common sight around Juneau again.) Now, after thirty years, it's possible for Juneau residents to walk down the streets of town or sit on their decks or go hiking with their kids and have a fair chance of seeing goats during the course of their everyday activities. I can't think of anywhere else in Alaska you can go for a short hike and see goats from a relatively short distance, because the goats that use the mountainsides near the Juneau road system have become so habituated to the presence of hikers and climbers that they often don't do more than just alert a bit and watch as you pass - a fact that brings me to another point. For much of the past 30 years, I have made a large part of my income guiding professional wildlife photographers and film crews around Alaska, and the goats that frequent the areas around Juneau are the ONLY goats in the state that are both accessible enough and sufficiently habituated to give older photographers or photographers with minor mobility issues a reasonable chance. The same applies to a far larger number of people who enjoy watching wildlife. There are also a number of small and medium size businesses in Juneau that take tourists on hikes and climbs around Juneau, and accessible wildlife is always one of the biggest draws for those businesses client base. Over the years, literally thousands of visitors have felt privileged to see these goats, and dozens of jobs are made more possible by this and other Southeast wildlife opportunities. Currently, the closed area is the smaller portion by far of the contemporary goat range accessible from the road system and it seems unreasonable to open it to hunting that would alter the goats patterns and behavior. A much larger area is open than is closed. Given the 'alternate use' of the goats that utilize the slopes visible and accessible from very popular hiking trails, it seems that opening this area up to bow hunting after all these years would make a clash between user groups inevitable. Having a bow hunter take - or perhaps worse,



wound and let escape - a goat as visitors and local hikers watched could easily result in the sort of backlash that can impact small businesses that promote watchable wildlife situations.

I also oppose opening the area to goat hunting for reasons that are more about the aesthetics of the trophy hunting than financial or 'social' issues; Goat hunting has always been one of the true challenges to a hunter's abilities. If someone succeeds in taking a good goat, it is because they earn it, through effort, skill, and perseverance, under conditions that are often uncomfortable, much like getting a good full curl ram. Currently, anyone willing to put in the effort still has a very decent chance of taking a goat in the open areas reachable from the Juneau road system. But they DO have to put in the effort. A friend who took a goat this past autumn did it by hiking up the Sheep creek trail to treeline, then climbing and working his way inland to the hunting area, finding the animal he wanted, then spending hours working his way close enough for a good shot, and dropping the animal cleanly. He had to stay the night on the mountain camping dry with minimum shelter, then spend the next day skinning and caping, and packing the meat out. He worked hard for that goat and had the satisfaction of earning it. With the exception of some hunters from the native communities in northern Southeast like Klukwan, goat hunting is usually not as much about putting food on the table as about the 'trophy' that demonstrates the skill and effort required to get it. Opening up the closed areas reached easily from the road system to the taking of habituated goats would devalue that, plus deprive a large group of alternative users of their own use of this small, specific population of animals.

I would also like to draw a parallel for the board between the Dall Sheep viewing areas in other regions of the State, on the Kenai peninsula, Sheep Mountain Game Protection Area, along Turnagain Arm near Anchorage at Windy Point, and mile post 209 on the Richardson Highway, where visitors and Alaskans alike have enjoyed watching sheep for decades now, without the restrictions imposed on similar activity with national parks land, and the opportunity residents and visitors have for a similar experience with goats on the mountains near the Juneau road system, and emphasize that this is the ONLY place in the state accessible by road rather than boat where this is possible. Opening the area to hunting after three decades of effort to reestablish the herd would change that.

For these reasons, I respectfully ask the board to reject proposal #23.

Lynn Schooler
Amalga Harbor



From: Lynn Schooler gmail
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Comment on Proposal #22
Date: Wednesday, December 26, 2018 3:13:47 PM

Proposal #22 to remove the three wolf take limit per year with the Douglas Island management unit in GMU-1 is unnecessary. The 3 per year limit was enacted by the Board of Game years ago after one trapper eradicated the entire pack that roamed the island and started a public outcry. The limit was enacted by the board because the board acknowledged that there is a place for wolves on the island in numbers that do not significantly effect the deer population or the supply of deer for hunters, largely from the Juneau area, and for use by non-hunter groups like wildlife photographers and 'fans.' Nothing in that has changed. There is absolutely NO reason to think the deer population on Douglas Island is being impacted by the limited number of wolves now roaming the island, or that there is any sound biological or management issue to justify taking more than three. I ask the board to maintain the status quo here, since it has worked perfectly well now for many years to give all the different user groups equal use. Change the rule to do away with that limit, and there will again very likely be a repeat of the large take that resulted in the adoption of the three wolf limit in the first place, with a repeat of the public outcry by the public and other interested user groups. And again, there is no good reason to undo what a previous board worked very hard to accomplish and balance the use of the resource.

Please do not adopt proposal #22. Maintain the status quo and leave the three wolf limit in place.

Respectfully
L. Schooler
Amalga Harbor



Board of Game

December 27, 2018

Via email: dfg.bog.comments@alaska.gov

Proposal 5

The Proposer does not define "taken" in their written support. Let's assume "taken" represents an animal shot and subsequently deemed illegal. Let's assume further the Proposer is stating this is occurring because of the errors in antler restriction judgement.

I believe the number of moose poached may exceed the number of animals taken. I define "poached" as intentional harvest with a disregard to antler restrictions, sex and season. Subsistence attitude, combined with opportunity (the increased population), leads to unreported harvest of all species. I cannot substantiate this claim for Southeast Region but have experienced in other parts of the state how bush rules take priority over state law.

Unit three moose population has increased significantly the past decades. 1991 had 9 moose harvested in Unit 3. Harvest counts for 2016 reported 80, 2017 120, and this year 112.

Richard Lowell was the Petersburg Game biologist until retirement earlier this year. His primary concern with an any bull hunt for Southeast Region is the effect on the age class of the herd.

Predator impact and winter conditions is constantly changing the populations which is generally evidenced by harvest amounts.

Any bull hunts can create an opportunity to overharvest in any certain year. I do not believe Southeast Region has a population that exceeds carry capacity. Part of the historic population increase experienced is the result of disturbed soils from logging that provides forage in a higher volume than an original or old growth forest. In the not so distant future the population may begin to decrease as the result forest recovery.

My concern with any bull hunt in unit three is the risk of the season rapidly evolve to a derby consisting of hunters that are not residents of the unit or SE Alaska for that matter. The appeal of any bull will surely cause the hunt to evolve to a season that may last only a number of days.

Alaska uses draw hunts to provide any bull hunt opportunity in different parts of the state generally as a population management tool and in areas where hunter demand risks overharvest. The current regulations provide for anyone to hunt Southeast Region. A draw hunt will limit individual opportunity and the odds of being successful at receiving a draw permit generally decrease with each year.



Antler restriction policies have proven to be beneficial to herd management throughout the state of Alaska over the past several decades. "If it runs well, do not screw with it" applies here in Southeast Region.

Please do not support Proposal 5.

Respectfully submitted,


Bradley Shaffer

PO Box 6255, Sitka, AK 99835

907-738-3218

Bradleys54@gmail.com



Submitted By
John Sisk
Submitted On
12/27/2018 5:25:54 PM
Affiliation
none -- private citizen

Proposal #22: Removal of Hunting Quota on Douglas Island Wolves. Opposition.

I oppose Proposal 22 for the following reasons. I would like to see Douglas Island managed to maintain both wolves and a healthy deer population that can support a good hunting opportunities and harvest success for local hunters who do not have the means to hunt on other islands. To achieve these goals ADF&G needs to have the flexibility to restrict wolf harvest or liberalize wolf harvest over time based on changes in deer populations and habitat carrying capacity as well as wolf populations. Currently ADF&G has this management flexibility under the existing management regulations, as evidenced by the following language in the current rule: "...if the department determines that a significant deer decline has occurred or is likely to occur, the department will increase the wolf bag limit and harvest cap as necessary to avoid a decline or rebuild the deer population; as part of this determination, the department will attempt to prevent extirpation of wolves and maintain some level of wolf protection on Douglas Island." The current rule gives ADF&G the authority to make exceptions to the 3 wolf annual harvest limit for the right reasons. It also acknowledges that maintaining a wolf population on Douglas Island is an explicit objective of wildlife resource management on the island; this is right and reflects a local interest in wolves that is widely held (by many deer hunters as well as non-hunters) in the Juneau area. This new proposal would eliminate wolf harvest restrictions altogether which is too extreme. Therefore, I oppose Proposal #22.

Submitted By
John Sisk
Submitted On
12/27/2018 5:45:16 PM
Affiliation
self

Comment in Opposition to Proposal #23, Hunting seasons and bag limits for goat.

I oppose Proposal #23. I've lived in Juneau long enough to remember when mountain goats were extirpated from Mount Juneau and adjacent areas. Although that was rifle hunting, bow hunting could have similar impacts to goat populations. At times I've approached very closely to mountain goats in Alaska and in the Rocky Mountains, as a recreationist and as a research assistant; it is not as hard to get within bow range of a goat as people may think -- especially in the area of concern.

I followed ADF&G's efforts to re-establish goats in the area and the eventual establishment of a robust presence of goats. Today a great many of us Juneau residents appreciate seeing those goats from downtown, from surrounding ridges and valleys, and sometimes at quite close distances. Juneau has provided spotting scopes downtown so that tourists can look for goats on Mt. Juneau. At the Mendenhall Glacier tourists watch goats on Mt. Bullard using similar scopes. I have spent countless hours observing mountain goats in the Mendenhall Glacier area, on Mount Juneau and surrounding ridges, and even on the lower side slopes of Perseverance Trail. Viewing goats in the area that would be affected by Proposal 23 is nextremely important to large numbers of local residents as well as tourists. The Board of Game should reject Proposal 23 and keep the area off limits to hunting of mountain goats.

Submitted By
John Sisk
Submitted On
12/27/2018 6:08:58 PM
Affiliation
self

Statement of Opposition to Proposal #28 which would open the Juneau area to bear baiting.

I wish to go on record with the Alaska Board of Game in opposition to Proposal #28. There has been an enormous amount of public input and engagement regarding the management of black bears in the greater Juneau area and there are very good reasons that bear baiting has not been allowed and should not be allowed now. The biggest problem with bear management in this area is habituation of bears to human food and garbage as well as food and attractants provided for bears or left available inadvertently by people. When bears become habituated to people and our related food sources, both people and bears are put in danger. There may be some who believe that the solution to this challenge is to kill more or most of the bears, however that approach has been rejected soundly by Juneau for many many years. Instead, we have strict rules on human behavior and garbage to ensure very low risk of bear habituation or bear -- human contact. This has proved to be a successful management approach. Luring bears to food and scent stations so that they can be shot is at odds with this current successful management approach. It is inconsistent to impose strict limits on Juneau residents' handling of food, garbage and other bear attractants and then allow hunters to use similar attractants to lure bears into easy rifle range. A one mile distance from buildings and roads is not acceptable because the Juneau area is laced with recreational trails and trail-less areas that are used heavily for recreation. The practice of bear baiting near Juneau -- an area best characterized as urban, suburban and recreational -- also runs the risk of attracting (and potentially habituating) brown bears, wolves and other wild animals. This is simply a wrong place to bait bears, period. Therefore I am strongly opposed to Proposal #28.



Sitka Tribe of Alaska

Tribal Government for Sitka, Alaska

December 13, 2018

Sent: Via Fax

Ted Spraker, Chairman
Alaska Board of Game
ADF&G Board Support
P.O. Box 115526
Juneau, AK 99811-5526

RE: Sitka Tribe of Alaska's Comments on the 2018/2019 Game Proposals

Dear Mr. Spraker,

I write on behalf of Sitka Tribe of Alaska (STA), tribal government in Sitka, Alaska for over 4,000 tribal citizens. As a tribal government, STA is responsible for the health, welfare, safety, and culture of its citizens. STA respectfully submits the following comments on the 2018/2019 Southeast Alaska game proposals.

Proposal 1 (Opposed)

STA is opposed to this proposal due to the increased potential of wounding an animal and not being able to recover it. There is also concern the wounded animals can become aggressive and attack the hunter or other members of the public that may encounter the animal.

Proposal 2 (Opposed)

STA is opposed to this proposal because it creates an unfair advantage for the harvest of game by landowners that is not afforded to the rest of the public.

Proposal 3 (Opposed)

STA is opposed to this proposal since it sanctions the wasting of edible meet and violates traditional Native values of full utilization.



Proposal 4 (Opposed)

While STA supports the exemption for hunting from a boat by a person with disabilities (as defined in AS 16.05.940), it is opposed to this proposal out of safety concerns and the increased potential for wounding/loss of the targeted animal due to poor shot placement.

Proposal 13 (Oppose as Written)

STA supports the concept of requiring trappers to mark their traps but not with personal information. Requiring personal information (name, address, etc.) leaves trappers open to personal or public attacks by individuals or organizations opposed to trapping. Requiring traps be marked with the trapper's license or permit number (which can only be cross referenced by the State) would protect the trapper's identity.

Proposal 14 (Opposed)

STA is opposed to the proposed requirement of posting signs near trapping locations. Posting signs near traps is an invitation for antitrapping or animal rights groups harass trappers by interfering with their legally set traps.

Proposal 18 (Opposed)

STA is strongly opposed to the proposed increase in deer harvest limits in Unit 4. All of the communities located within the boundaries of Unit 4 are considered rural under Federal subsistence guidelines, which allows residence of these communities to harvest two additional deer under Federal subsistence regulations (on top of the State harvest limit of four deer). Currently residents of nonrural communities can legally harvest four deer in Unit 4 under State regulations. Increasing the harvest limit to six deer would create competition for the limited resource between rural and nonrural residence and impact the ability of federally qualified subsistence harvesters to meet their needs.

If you have any questions regarding these comments, contact STA's Resource Protection Director Jeff Feldpausch at (907)474-7469 or email jeff.feldpausch@sitkatriben-sn.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kathy Hope Erickson", with a long, sweeping underline.

Kathy Hope Erickson
Council Chair



Submitted By
Mary A Slemmons
Submitted On
12/26/2018 4:51:00 PM
Affiliation

Proposal # 22 - opposed

Submitted By
Mary A Slemmons
Submitted On
12/26/2018 4:55:15 PM
Affiliation

Proposal #23 - opposed

There are other areas nearby for archery hunting. The proposed hunting could eliminate local viewing of mountain goats. Mountain goat population does not need to be contained at this time.

Submitted By
Mary A Slemmons
Submitted On
12/26/2018 4:57:26 PM
Affiliation

Proposal #28 - opposed

Bear baiting could encourage bears to be attracted to food, something we are already struggling with.



From: Jeff
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: SE Game Board comments
Date: Wednesday, December 26, 2018 12:36:19 AM

Dear Alaska Board of Game,

I've been a resident and hunter in SE Alaska for nearly 40 years, live in Juneau and have worked across our State as far north as the Brooks Range.

Having hunted in the Juneau area and Southeast Alaska for over 30 years, I support the fair chase of hunting game in SE Alaska and would like to comment on three upcoming Board of Game Proposals to be heard in Petersburg, January 11-15 on proposed game regulation changes in the Juneau game hunting areas.

The proposals are #22, #23 and #28.

PROPOSAL : #22, REMOVE HUNTING QUOTA ON DOUGLAS ISLAND WOLVES.

OPPOSE – Our family has hunted deer on Douglas and unfortunately, has never had a wolf contact. We have seen wolf sign and this always makes us feel excited to know there are wolves about. We have shot our share of deer on Douglas and feel that having wolves on the island is part of a fair hunt. Knowing there are wolves around adds to the wildness of the experience. We do not support eliminating the Douglas Island Management Area in GMU 1-C and removing the annual 3 wolf harvest quota for the island. Our family feels strongly that reasonable numbers of wolves have a place on Douglas island, and that the public is well served to know that the island is wild, has wolves and that there is a chance that wolves can be seen and enjoyed by all who venture out into the wilderness. Please keep the 3 wolf harvest quota in place on Douglas Island. It works well and does not need to be changed.

PROPOSAL #23: ALLOW ARCHERY HUNTING OF MOUNTAIN GOATS ON MT JUNEAU AND NEARBY AREAS

OPPOSE – We strongly oppose additional archery hunting of mountain goats on Mount Juneau, Mount Roberts, and the entire Juneau area from Mendenhall river/glacier to Taku river/glacier. We lived in downtown Juneau for over 30 years and value being able to look up and see a few of the Mount Juneau goat herd on many days. As locals, we are proud to show the goats to our many visitors, as this is often the first time many SE Alaska visitors have ever seen mountain goats. We are very fortunate to be able to see goats along the Juneau road and trail system. Unlike Alaska's more remote goat areas, our local goats see summer hikers in close



proximity and do not run away. This would not be a fair chase or sporting to allow this habituated population to be hunted. I was part of a group of residents that donated funds to transplant goats back to the Mount Juneau area for viewing! This goat population is better used for wildlife viewing and non-consumptive enjoyment of goats without additional pressure from hunting. The value of goats for viewing for our local population and summer visitors is obvious. There are other hunting areas around Juneau that are more suitable to accommodate goat hunters. Please do not change or increase the current mountain goat archery areas in Juneau.

PROPOSAL #28: ALLOW BEAR BAITING IN JUNEAU

OPPOSE: We strongly oppose allowing in the Juneau area (1C) any black bear baiting at bait stations. Baiting black bears as a hunting method is not fair chase and is unworthy of good sport hunters. It sets up a very unsportsman like example of bear hunting to most hunters and non-hunters alike. Juneau has densely populated neighborhoods and downtown areas. We have bears in all the neighborhoods due in a very limited building areas surrounded by mountains. Allowing bear baiting has the direct possibility of causing bears to become accustomed to human food, more bear-human conflicts, and pushing bears to become garbage bears. Luring bears to bait stations with human food seems like a bad hunting policy for Juneau and has no place in a fair bear hunt. We oppose this change.

Thank you for considering my comments.

Sincerely,

Jeff Sloss
15775 Glacier hwy., Juneau, AK 99801



Submitted By
Nathan J. Soboleff
Submitted On
12/28/2018 1:45:54 PM
Affiliation
resident hunter and trapper

Phone
907-321-5594
Email
sobolefn@hotmail.com
Address
3025 Fritz Cove Road
Juneau, Alaska 99801

Proposal 22 - Elimination of the Douglas Island Management Area in Unit 1C...

I support this proposal.

Beginning around 2002 when a pack of wolves were harvested and the Juneau community got upset and the Douglas Island Management Area was set up. Around 2013 the number of wolves shot up and there were reports of as many as 20+ wolves sighted in one day on the back side of Douglas. Around 2015/2016 three wolves were harvested and the island was emergency ordered closed to trappers. Again the 2018 three wolves were harvested and the island was closed to trapping. This does not align with the plan of closing the island when 5 wolves are harvested. Myself and other trappers made an active effort to trap wolves on our own to reduce the number of wolves on Douglas Island during the 2017/2018 season. During this whole time we did not see any deer on the beaches or deer tracks at a time when you should see many deer tracks. Pellet transects by DWC Biologist Karin McCoy has revealed that deer populations have declined tremendously since 2008 at the North Douglas and Inner Point transects. This is due to the presence of wolves. Neighboring transects on Shelter Island have shown dramatic increases in local deer populations, the difference being no wolves present which have either preyed on deer populations or prevented their numbers from rebounding after large snowfall years 2006-2008. The same goes for Admiralty Island and more areas. This "management plan" has not managed the island for hunters but for wolves and the inability of the Division to manage the wolf population has come at a great cost to 1) hunters and 2) trappers... I have emailed three graphs from Karin McCoy's work publications on SE deer populations and added lines indicating important dates to the deer population on Douglas Island.

Proposal 20 - change of management to only allow the shooting of one doe on Douglas Island...

I do not support this proposal. This proposal is a lazy attempt to increase deer populations when the culprit is the unmanaged presence of wolves. This proposal will hurt hunters with out access to boats, and it will hurt young and new hunters. In order to grow license sales we need hunters to buy licenses and we need to be able to provide hunting opportunities to those without access to boats. Additionally during the tail end of the season when bucks are supposed to drop their antlers new hunters will not be able to distinguish does from bucks resulting in missed game harvests or increase in citations.

VCU 35 North Douglas - Wolves Present

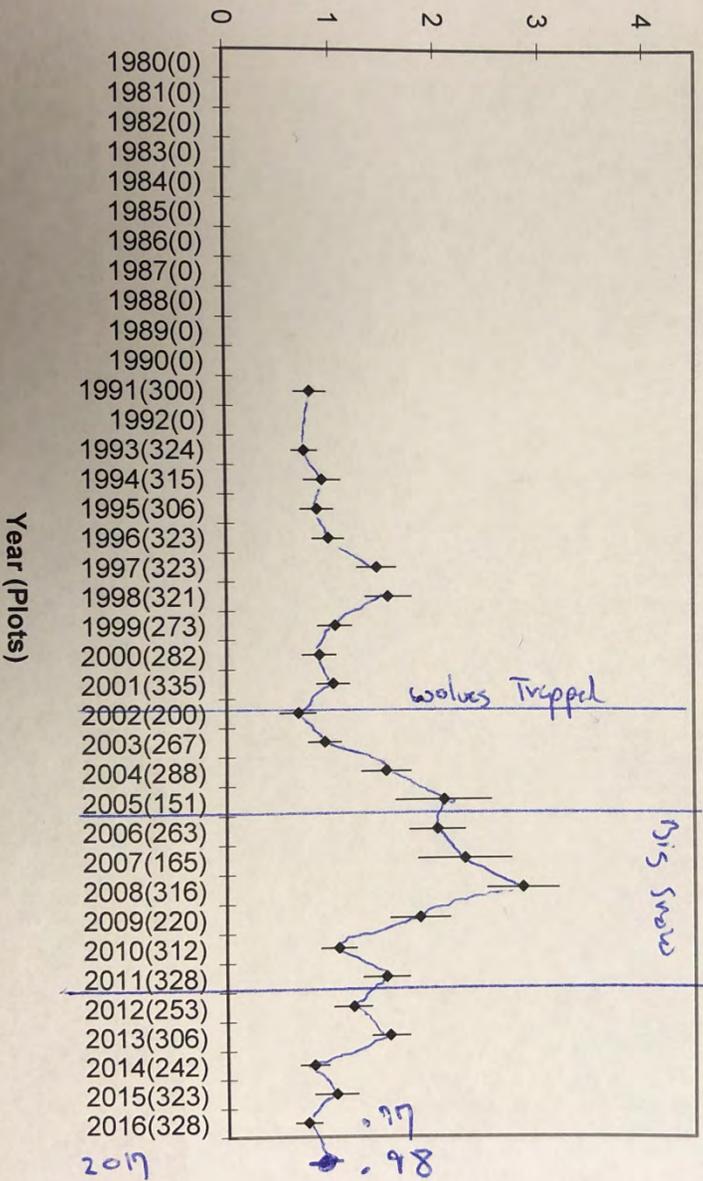
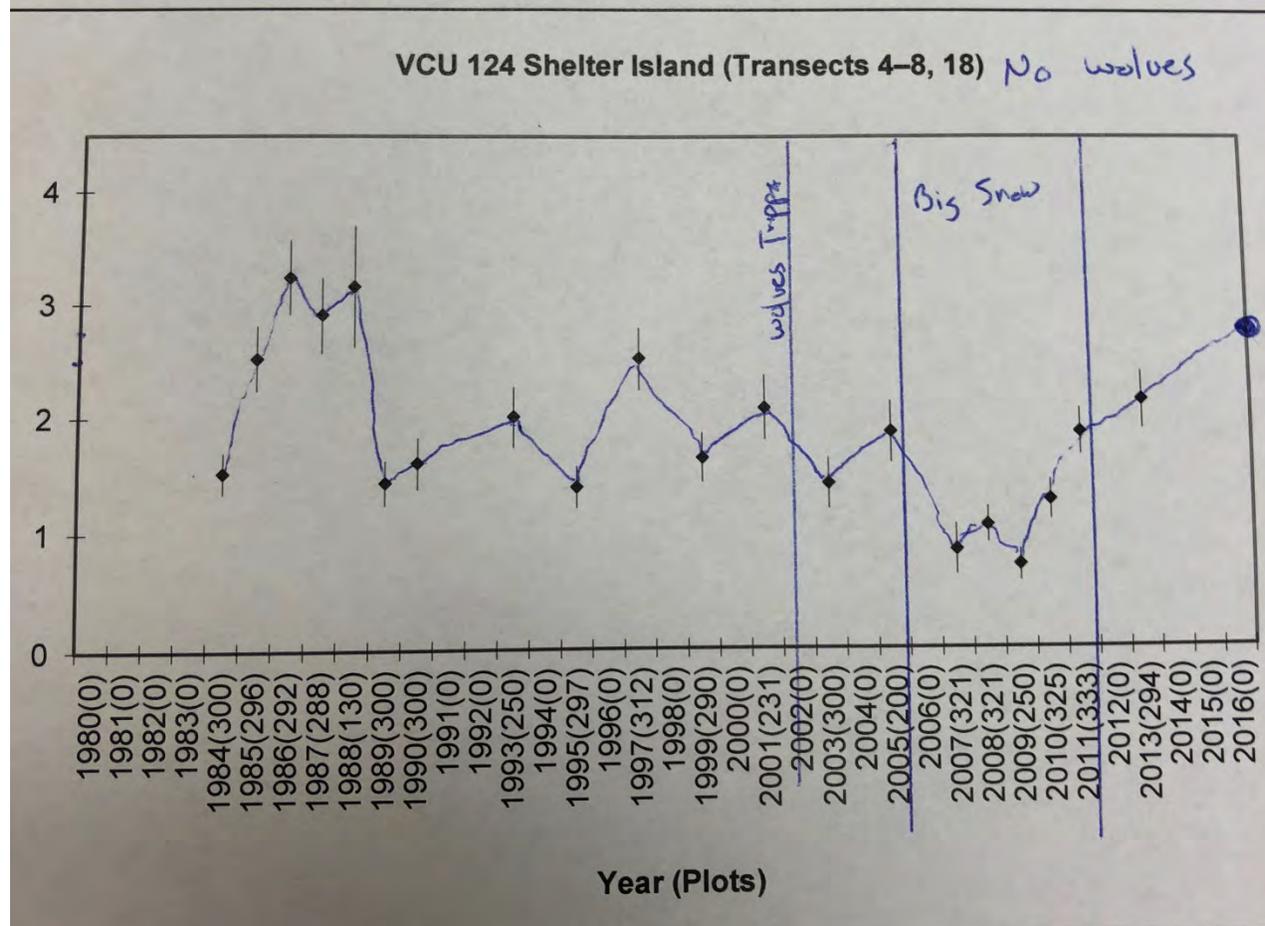


Figure 11. Mean deer pellet-groups per plot, VCU 35, North Douglas, Alaska, 1980-2016.

dropped again in spring 2014. The low was in spring 2015 and spring 2016, however, likely due in part to fewer deer being more widely distributed during those extremely mild

Plots were chosen because they were the most easily accessed and can be completed with a 6-person crew. Because the island is narrow, each transect is relatively short. Surveyors hike one transect and then hike to the nearby start location of the next. The chart below displays pellet-group densities on only these 6 transects. Pellet-group densities for 1980-2016 that include all transects surveyed during intensive sampling may be found in Appendix 1. VCU 124 has not been surveyed since 2013, but the trend then indicated the population was increasing. Given recent mild winters, the population is suspected to be healthy. Number of plots sampled each year varies according to which transects were surveyed. Elevation was reached before encountering snow cover.



15. Mean deer pellet-groups per plot, VCU 124, Shelter Island, Alaska, 1980-2016.



ively milder winters of 2009–2010 and 2010–2011. Deer recover relatively quickly in this area, as indicated by higher counts in spring 2011 and spring 2012, after slightly below-average snowfall winters. It is unclear why the pellet-group counts dropped so significantly in spring 2014 (Fig. 13), given the winter snowfall was average and similar to that of the preceding winter. The even lower pellet-group counts in spring 2016, however, could be due in part to greater dispersal of deer across the landscape during the extremely mild 2015–2016 winter, higher pellet decomposition rates due to milder conditions, or detectability of pellet groups due to early green-up. Reports of wolves observed on Douglas Island increased during the 2015–2016 winter. The presence of wolves can affect populations by reducing numbers or slowing growth, but this has not been documented on Douglas Island. Note that the number of plots sampled each year varies according to which transect was surveyed and what elevation was reached before encountering snow cover.

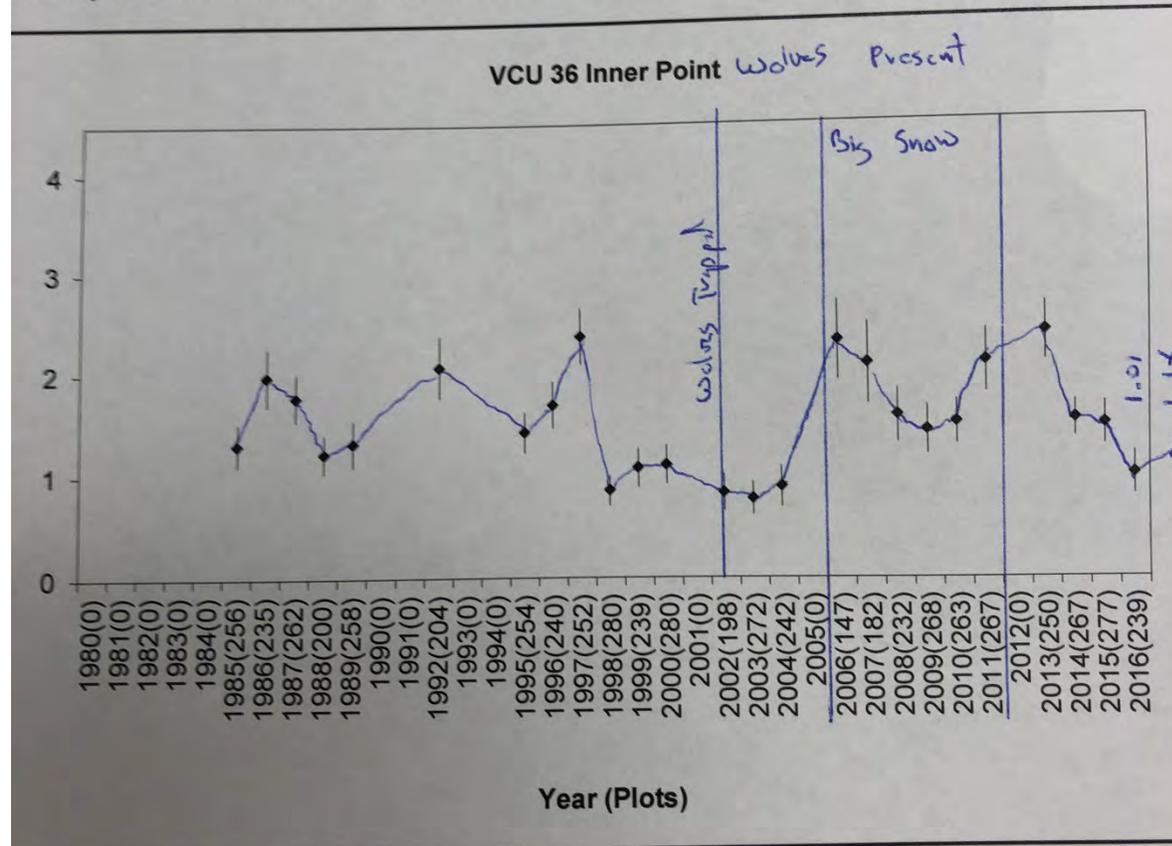


Fig. 13. Mean deer pellet-groups per plot, VCU 36, Inner Point, Douglas Island, 1980–2016.



***Southeast Alaska
Subsistence Regional
Advisory Council***

**Don Hernandez, Chairman
1011 E. Tudor Road, MS121
Anchorage, Alaska 99503**

DEC 10 2018

RAC SE18024.DP

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

Dear Chairman Spraker:

The Southeast Alaska Subsistence Regional Advisory Council (Council) is writing to withdraw its Proposal 42 and endorse Proposal 43, scheduled to be considered by the Alaska Board of Game at its January 11-15, 2019 meeting in Petersburg.

The Council is one of ten regional advisory councils formed under Title VIII of the Alaska National Interests Lands Conservation Act (ANILCA) and chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's charter establish its authority to initiate, review, and evaluate regulations, policies, management plans, and other matters related to subsistence within the Southeast Alaska region. The Council provides a public forum for discussion and recommendations for subsistence fish and wildlife management in the region. The Council also reviews resource management actions that may impact subsistence resources critical to Federally qualified subsistence users, whom the Council represents.

At its February 13-15, 2018 public meeting in Juneau, the Council voted to submit a proposal to the Alaska Board of Game to allow harvest up to 30% for wolves in Unit 2. This became Proposal 42. At the time we formulated Proposal 42, the Council preferred to set a management objective for wolves but did not have sufficient information to suggest a specific management objective. Subsequent to that meeting, Council members worked with staff from the Alaska Department of Fish and Game (ADF&G) to develop what is now Proposal 43.



Chairman Spraker

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At its October 16-18, 2018 public meeting in Sitka, the Council voted to withdraw Proposal 42, and hereby communicates that request to withdraw to the Alaska Board of Game. Based on discussions between the Council Unit 2 wolf working group and ADF&G, as well as discussion on the record as a whole Council, the Council voted unanimously to support Proposal 43. This proposal calls for eliminating the 20 percent harvest guideline currently in the codified regulations and establishing a management objective for wolves in Unit 2.

The Council supports Proposal 43 for the following reasons:

1. The current State regulation unnecessarily restricts management of wolves and subsistence harvests of wolves in Unit 2 by specifying a 20% Management Harvest Guideline. This guideline limits management flexibility and unnecessarily restricts subsistence harvests in times of abundance. The Unit 2 guideline limits are much more restrictive than wolf harvest regulations for other management units in Alaska.
2. The Council has found that setting a joint State and Federal harvest quota for wolves has not been working for the following reasons:
 - a. The harvest guideline for wolves has been set according to wolf population estimates based on DNA sampling. While this methodology may come up with a good defensible population estimate for wolves, the estimate is always out of date. The harvest guideline has always been out of date, requiring managers to set a harvest guideline based on one-year old data.
 - b. In times of abundance, the harvest guideline was below what the Unit 2 wolf population could sustain.
 - c. The harvest guideline has required closing the season by emergency order for five years. This creates uncertainty and hardship for subsistence harvests.
3. Subsistence harvest of wolves in Unit 2 is a harvest activity afforded by Title VIII of ANILCA and should not be unduly restricted. Adoption of the proposed regulation (Proposal 43) will allow the continuation of subsistence harvests and the transmission of knowledge to new trappers.
4. This new management approach incorporates the principals of adaptive wildlife management.
5. The Alaska Department of Fish and Game has worked effectively with the Council and assured the Council that it will incorporate tribal and community information on wolf population management in Unit 2. The Alaska Department of Fish and Game has indicated it will also incorporate reports from hunters and trappers on the size of the wolf population based on their experience in the field. It is the Council's understanding that ADF&G will continue to undertake DNA-based population estimates every 2-4 years. The Alaska Department of Fish and Game will use other methods of wolf population estimation, including traditional ecological knowledge (TEK), hunter/trapper reports,



Chairman Spraker

3

tribal and community reports, as well as den checks, and examination of the age of harvested wolves.

6. The Council agrees that an appropriate population management objective for Unit 2 wolves is 150 wolves. We support reductions in harvest opportunity if the population drops below this point. This management objective is supported by extensive public testimony and ADF&G analysis.

Finally, the Council appreciates the work of the Alaska Department of Fish and Game in addressing wolf management issues in Unit 2. The Council especially appreciates that ADF&G has consulted meaningfully with Prince of Wales wolf harvesters and that it has worked with the Council in developing this new approach to wolf management in this unit.

Thank you for the opportunity for the Council to voice its concerns over this very important issue affecting subsistence users in the Southeast Region. Any questions regarding this letter can be addressed through our Council Coordinator, DeAnna Perry, at 907-586-7918, or dlperry@fs.fed.us.

Sincerely,

Donald Hernandez
Chair

cc: Federal Subsistence Board

Thomas Doolittle, Acting Assistant Regional Director, Office of Subsistence Management
Jennifer Hardin, PhD, Subsistence Policy Coordinator, Office of Subsistence Management
George Pappas, State Subsistence Liaison, Office of Subsistence Management
Carl Johnson, Supervisory Program Analyst, Office of Subsistence Management
Chris McKee, Wildlife Division Supervisor, Office of Subsistence Management
Pippa Kenner, Acting Anthropology Division Supervisor
Office of Subsistence Management
Thomas Whitford, Regional Subsistence Program Leader, U.S. Forest Service
Kristy Tibbles, Executive Director, Alaska Board of Game
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game
Tom Schumacher, Southeast Regional Supervisor, Alaska Department of Fish and Game
Ryan Scott, Assistant Director, Alaska Department of Fish and Game
Interagency Staff Committee
Administrative Record



Submitted By
Larri Spengler
Submitted On
12/23/2018 6:51:14 PM
Affiliation

Phone
9075869768
Email
LSpengler@ak.net
Address
4545 THANE RD
Juneau, Alaska 99801

I urge the Board of Game to reject proposals 22, 23, and 28. All of these would make drastic and undesirable changes to Juneau.

Proposal 22 would repeal the Douglas Island wolf quota. Because of the ease of access by road and boat, the existing quota system was put in place to maintain a balance which will continue a presence of wolves on the island. The quota itself is a balance between too much hunting and a ban on hunting. Leave it in place, please.

Proposal 23 would allow bow hunting of mountain goats throughout the Juneau ridge system. These are all (not only the area by the Mendenhall Glacier Visitor Center) important goat viewing areas, highly valued by locals and attractive to visitors. Please leave the in-place system as it is.

Proposal 28 would allow bear baiting in Juneau. This would work to thwart all the hard and good work the community has done to try to minimize garbage bears, who often wind up having to be killed.

Thus, in summary, please consider the community that would be affected by these three proposals, and please reject them.

Thank you.

Larri Spengler

Submitted By
Larri Spengler
Submitted On
12/20/2018 3:22:12 PM
Affiliation

Phone
9075869768
Email
LSpengler@ak.net
Address
4545 THANE RD
Juneau, Alaska 99801

I oppose proposal # 23, which would open the Juneau ridges to bowhunting of mountain goats.

It is notable that Mount Bullard has been closed to all hunting since 1962, which was a wise management decision given the area's proximity to the Mendenhall Glacier Visitor Center. Wildlife viewing -- including and maybe especially mountain goats -- from the center and the area around it is an integral part of the experience of both locals and visitors. The quality of that viewing should not be jeopardized in any way, and opening the proposed hunt is simply too much of a risk to a valuable national, state, and local asset.

Thank you.

Larri Spengler



Submitted By
Sondra Stanway
Submitted On
12/24/2018 7:43:52 AM
Affiliation

Phone
907 364 2536
Email
spstanway@yahoo.com
Address
2935 Simpson Ave.
Juneau, Alaska 99801

To the Board of Game:

As a resident of Douglas Island, here are my comments on the following proposals:

Proposal no.22: I oppose this proposal. The quota should be kept to a minimum to prevent over harvest of wolves on Douglas Island which can occur because of easy road and boat access.

Proposal no, 23: I oppose this proposal. This area, close to the capital city, should be used for viewing mountain goats by local residents and visitors, not for shooting them.

Proposal no. 28: I oppose this proposal. In our densely populated capital area, luring bears to bait stations will increase our bear/people conflicts, already a major problem around the city. Furthermore, baiting bears is simply not sportsmanlike.

Thank you.



Submitted By
Pauline N Strong
Submitted On
12/27/2018 4:55:05 PM
Affiliation

Phone
9077236213
Email
paulinest@gmail.com
Address
19200 Williwaw Way
Juneau, Alaska 99801

PROPOSAL 23 5 AAC 85.040(a)(1). Hunting seasons and bag limits for goat.

I object to this proposal. Goats were re-established in this area in the 1980's, and these are the ridges close to town. People I work with enjoy seeing them occasionally, I like seeing goats when I hike Mt. McGinnis or Mt. Roberts in the summer and by the glacier in the winter. I think this area is too close to town and tourism to be a good place for hunting goats. There are more remote areas that are open that are more appropriate.

Submitted By
Pauline N Strong
Submitted On
12/27/2018 5:02:44 PM
Affiliation

Phone
9077236213
Email
paulinest@gmail.com
Address
19200 Williwaw Way
Juneau, Alaska 99801

PROPOSAL 28 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures.

I object to this proposal. I think bear baiting is unethical and can lead to problems with all kinds of wildlife and pets attracted to bait area. It doesn't make sense to allow bear baiting while it is unlawful to feed bears (State Regulation: 5AAC 92.230(a)(1)).

Submitted By
Pauline N Strong
Submitted On
12/27/2018 8:35:02 PM
Affiliation

Phone
9077236213
Email
paulinest@gmail.com
Address
19200 Williwaw Way
Juneau, Alaska 99801

PROPOSAL 22 5 AAC 92.530(23). Management areas.

I object to this proposal. The same road and boat access to Douglas that allows easy deer hunting would also allow easy wolf hunting/trapping. Keeping this a distinct management area allows the most flexibility for keeping a balance of deer and wolves.



Post Office Box 32712 • Juneau, Alaska 99803

Telephone: (907) 789-2399 • Fax: (907) 586-6020

December 17, 2018

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

The Territorial Sportsmen, Inc., a long-established outdoorspeople's advocacy group based in Juneau, Alaska has reviewed regulatory proposals to be considered at the Petersburg meeting and submits the following comments:

Proposals 16 & 29: Shift the hunting season for migratory game birds in Units 1-4 to Sept. 1 - Dec. 16.

The Territorial Sportsmen **support** this proposal. The Board's adoption of a later start date a decade ago was an interesting attempt to optimize the season for more hunters in the region, but we believe that much more waterfowl hunting opportunity was lost by eliminating the first two weeks of September than was gained by adding the last two weeks of December. To some extent, any attempt to provide maximum opportunity to all Southeast Region hunters is impossible unless the federal migratory bird regulatory system is changed to allow additional zones in the state, due to variation in migration timing in a region that spans outer coast to Inside Passage in an east-west direction and over 365 miles north to south from Skagway to Ketchikan. Lacking such freedom under the federal system, we believe that more hunters will benefit from being able to hunt early migrants in relatively mild early September conditions as opposed to the shorter, colder days in late December, when most of the migration has passed.



Proposals 13 (Tagging of traps) & 14 (Signage on traplines).

The Territorial Sportsmen **do not support** these proposals as written. However, if the Board concludes that trap or trapline identification is necessary, we suggest that such measures be required only in specific areas of heavy multiple use where serious conflicts are demonstrated. We also recommend that any signage requirements be limited to general areas or drainages rather than individual traps or traplines.

Thank you for the opportunity to comment.

For the TSI Board,

A handwritten signature in black ink, appearing to read "Matthew Robus", with a large, stylized flourish at the end.

Matthew Robus, President
Territorial Sportsmen, Inc.



Submitted By
Kim Titus
Submitted On
12/28/2018 1:58:56 PM
Affiliation

Phone
9077234192
Email
ktitus54@gmail.com

Address
4638 River Road
Juneau, Alaska 99801

Alaska Board of Game Proposal Comments

Kimberly Titus

4638 River Road

Juneau, Alaska 99801

Proposal 2 – food plots for deer

I am opposed to this proposal for a few reasons. From time to time, we have deer in our yard in Juneau, especially in the summer. They are highly selective for certain plant species (e.g., hostas, lettuce, carrot tops) but ignore many others in favor of the wild *Vaccinium* on our property.

1. Much of the private property in Southeast Alaska is within city/borough limits where there are already firearm discharge prohibitions/public safety concerns. Increasing deer populations in suburban areas where they cannot be hunted is a significant deer management issue in some parts of the USA. It results in frustration by the public and often unresolved deer management issues such as use of chemical deterrents in the environment as homeowners try to protect their shrubs and gardens, increases in deer being stuck by autos, unsuccessful attempts to sterilize deer and significant local public discourse.
2. The major private landowners in Southeast Alaska are Alaska Native corporations; whether they would want food plots on those lands is unclear.
3. It is unclear what the food plots would be composed of. If seeds were used, this would likely cause the spread of invasive plants. State and federal agencies in Alaska have programs to keep non-native plants out of the state.
4. Deer researchers in Southeast Alaska many years ago tried to attract Sitka black-tailed deer using various foods as a trapping method. These various food plots were completely unsuccessful. Put simply this deer species was not attracted to the many foods that can be used to attract mule deer or white-tailed deer.
5. I am quite confident that bears will be more attracted to a food plot than a deer.

Proposal 3 – deer rib meat salvage

I am opposed to this proposal. I am an avid Sitka black-tailed deer hunter and I have harvested many deer across Southeast Alaska in the past 30 years; most from Admiralty Island. I do agree that the amount of rib meat from these deer is small. However, as the key subsistence species across Southeast Alaska, it is paramount to salvage all of the meat from the animal. Like most deer hunters, I add the meat to the burger bag. Keeping these meat salvage regulations as consistent as possible across the state for all big game is one way to reduce regulatory confusion.

Proposal 4 – shooting deer from a boat

I am opposed to this proposal for 2 reasons. First, I had deer hunters shooting towards me from the bow of a large commercial fishing boat in 2006 when there was heavy snow (Seymour Canal – Admiralty Island) and many deer were on the beach. The hunters in the boat were shooting at the same deer I was stalking on the beach. I jumped out of the brush, waived my orange hat and the hunters stopped shooting and the boat moved away. Therefore, I find that there is a human safety issue. Second, I find that there is a significant deer wounding loss issue. How would hunters shooting from a large commercial fishing boat 150 yards offshore even know if they hit a deer? Even shooting from a small skiff closer to shore in saltwater poses wounding loss issues that are arguably greater than those from a hunter who is standing on firm ground.

Proposal 7 – eliminate black bear sealing requirement for residents

I am opposed the elimination of black bear sealing. Black bear abundance is unknown across all of Southeast Alaska, so harvest rates are difficult to estimate. There have been two black bear studies in Southeast Alaska, one on Prince of Wales Island where abundance/density estimation was not a goal, and the other on Kuiu Island where I was involved in the project specifically to estimate abundance and density (see *Journal of Wildlife Management* 2011 - 75(6):1513-1520.). That estimate is now stale/old assuming one adopts the criteria used by the polar bear specialists group for use of old bear study results. Obtaining sex/age and other information from



sealing black bears is at least one tool that managers (ADFG) have to inform the decision-makers (Board of Game) about the status various black bear populations across the region. Harvest ticket reporting does not provide that level of detail. I disagree with the department's assertion that they can sustainably manage black bears with the loss of sealing data. There are portions of interior Alaska where sealing is not required but black bears are lightly harvested in many of those areas, so risk of overharvest is low. Black bears in many parts of Southeast Alaska are heavily harvested both by residents and nonresidents. Nonresidents make use of lodges and big game guides for black bear hunting and this activity is an important seasonal economic factor in some small communities. I suggest that the Board keep the sealing requirement so that sustainable black bear harvest can be maintained using sex/age data that is obtained via sealing along with a more complete count of harvested bears. Harvest ticket data are far less reliable. The loss of sex/age data would compromise any future analysis using some of the newer data analysis methods to estimate sustained yield. Such analysis using long term sex/age at harvest data may allow for more liberal harvest regulations while also lowering the risk of overharvest. That's just better science-based wildlife management that benefits hunters, viewer and the conservation of black bears.



Submitted By
Michael Tobin
Submitted On
12/26/2018 2:18:08 PM
Affiliation

Phone
907-321-0038
Email
miketobin2046@gmail.com
Address
PO Box 34577
Juneau, Alaska 99803

For Board Of Game Meeting January, 11-15, 2019

Proposal 22

Oppose

This proposal fixes what isn't broken in that a decline in deer population on Douglas Island is not documented. The evidence is as described by the ADF and G for Proposal 20. The Special Management Area recognizes that in a semi-urban area like Juneau the non-consumptive use of certain animals is important to many people. The Special Management Area was created after public outcry when one trapper wiped out every wolf on Douglas Island. It was crafted as a compromise between user groups. The goal was to have some wolves and also to protect deer and deer hunters. Though it is important to revisit it periodically, there is no need to rescind the Special Management Area at this time.



Submitted By
Tim Travis
Submitted On
12/27/2018 9:47:26 AM
Affiliation

Phone
9072095560
Email
timntravis@gmail.com

Address
5821 North Douglas Highway
Juneau, Alaska 99801

I strongly support proposal 22 "Remove the Douglas Island Management Area in Unit 1C from regulation".

I live and hunt on North Douglas and I have seen a large increase of wolves on the island. These wolves are not staying on Douglas they travel across the wetlands on lower tides around the 9 mile creek area, so there is no way to know exactly how many wolves are on the island at any given time so how can you say we need to reduce trapping and hunting of wolves on Douglas when the wolves are moving on and off the island as they feel. As the Juneau wolf population continues to grow and we need to allow them to be managed by hunting and trapping, before they overwhelm our deer population.

Submitted By
Tim Travis
Submitted On
12/27/2018 10:05:17 AM
Affiliation

Phone
9072095560
Email
timntravis@gmail.com

Address
5821 North Douglas Highway
Juneau, Alaska 99801

As an avid waterfowl hunter I strongly support proposal 29 moving the season back to starting September 1 and ends on December 16. I agree that when they moved the season start date to the 16th it has reduced our opportunity to hunt early season migrating birds like Teal, Wigeon and Pintail. The waterfowl hunting after December 16th is very limited due to the majority of waterfowl have migrated south and you have less hunting hours due to less daylight hours. On average I take more than 50% of my annual duck harvest in September. The season should have never been moved to a September 16 start date.

Submitted By
Tim Travis
Submitted On
12/27/2018 10:19:22 AM
Affiliation

Phone
9072095560
Email
timntravis@gmail.com

Address
5821 North Douglas Highway
Juneau, Alaska 99801

I oppose proposal 30. There is no need for a youth only waterfowl hunting period, the youth can go hunt during the regular season with their parent or guardian just like myself and many others have over the years when growing up hunting in the Juneau area. I shot my first duck while hunting on the Mendenhall wetlands as a youth with my father and I didn't need a special youth season to do so. If we impose a youth only season on the Mendenhall wetlands it will take away from all of those other hunters who solely hunt the Mendenhall wetlands for waterfowl. I plan to take my children with me on the wetlands and hunt when they are old enough and I don't think they need a special youth only season to do so.



Submitted By
Tim Travis
Submitted On
12/28/2018 8:38:45 AM
Affiliation

I strongly disagree with proposal 19. Having worked at Greens creek mine site in the past I have never heard of anyone having an issue with people hunting in that area. The mine site is not where they will be hunting anyways, hunters may use the first section of the road (the A road) to gain easier access to the woods near the mine but thats it. This land that they are operating on by permit from the forest service belongs to the people not to the mine, they should not be able to dictate hunting in the area near the mine.

This mine site needs hunters, it needs them to help control the brown bear population in the area so they don't have another fatal attack on a miner by a brown bear.

I also find it strange that this proposal was put under the Sitka area and not the Juneau area, cause the Juneau area is who it will affect the most. Seems like someone was trying to pull a fast one.



From: Kristine Trott
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Board of Game Proposal #22
Date: Monday, December 24, 2018 8:10:26 AM

Dear Board of Game,

My name is Kristine Trott and I live at 19100 Williwaw Way in Juneau, Alaska. I am a sitting member of the Juneau Advisory Committee but am writing today as a private citizen since my vote against this proposal was overwhelmed by the rest of the members. I strongly oppose Proposal #22.

Proposal #22 was put forth by a member of the JAC who is a long-time trapper and is in no way an uninterested third party.

This is a very short-sighted outlook on the issue of the wolf population on Douglas Island. It is claimed that hunter success is down due to over-predation of the deer population but I have talked with many gardeners in the north Douglas area who tell me they can't grow vegetable gardens without putting up elaborate fencing to keep out the deer. In the past, kayak guides for adventure tours could often count on being able to take their guests to the backside of Douglas and show them wolves playing or visiting the beachfront; giving their guests the thrill of a lifetime. That is no longer the case.

I have hunted on Douglas Island with my son and we have seen and heard large numbers of hunters there. The Juneau population has grown immensley since I first came here in 1978 and I believe it is the growth in hunter numbers trying for the same deer on Douglas that has been limiting hunter success and not an excess of wolves. Humans target the best of the best but wolves target the old and sick deer, which helps to keep the population healthy.

Please do not take away the limit on wolf trapping for Douglas Island. Snares and traps are a brutal and barbaric way to kill an animal, as we've witnessed twice this past summer. And that is just the tip of the iceberg! There are more people who value a live wolf than there are trappers--who, by the way, are taking a public asset for their own personal gain.



From: Kristine Trott
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Proposal #23 Expanded Area of Bow Hunt for Mountain Goats
Date: Monday, December 24, 2018 8:41:41 AM

My name is Kristine Trott. I live at 19100 Williwaw Way in Juneau, Alaska. I am writing in as a concerned citizen in opposition to Proposal #23.

I strongly oppose this request. I do not believe it is a safe endeavor to mix hunters into our hiking areas. I am only one of many who hike a great deal on our Juneau trails and value the wildlife experiences that we often get to have. That is a very special quality of this trail system that is so very close to our town. When I read the proposal my hair practically stood on end with the concern for people who will be hiking while there are hunters on the same trails, in the same areas. I feel the two do not mix!

In the 70's, my father, Dr. Otto Trott, came to teach mountain/emergency medicine up on the Juneau Icefields for Maynard Miller for a number of summers. The first time he arrived in Juneau he looked up at the face of Mt. Juneau and remarked, "You have a herd of mountain goats above your city.", and pointed them out to the crowd. That is the most special thing about our town and trail system: near enough to be accessible by all who want to, and safe enough for the wildlife to want to share the environment near us.

I am sorry he has no boat to travel to more inaccessible, but more appropriate hunting areas, but I cannot feel that adding bow hunters to the hiking population is a wise decision. Furthermore, these goats have become accustomed to the safe presence of humans. I have heard accounts of people stopping to rest for a picnic in the alpine areas and having some nannies and kids hanging out on a shelf just below them. How special is that?

Please do not allow hunting of this very small, very special goat population.



From: Kristine Trott
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Fish & Game Proposal #28 Allow Bear Baiting Near Juneau
Date: Monday, December 24, 2018 9:02:28 AM

My name is Kristine Trott. I live at 19100 Williwaw Way, Juneau, Alaska.

I strongly oppose this proposal, #28.

First off, it is so completely against fair chase hunting practices that I am horrified it is even allowed anywhere! Secondly, bear baiting has not been allowed in the Juneau area for 20 years or more because of the close confines of the city and wilderness here. People hike in groups and alone and often with their dogs on the trails and in the woods areas here. Hunters who want to bear bait would be using these same trails to access those bait stations. Bears easily become accustomed to human food sources and will tend to lose their fear and respect for humans when they learn that humans can and do provide them with easy, tasty food. The chances for a horrific encounter is increased immensely with this kind of practice.

The hunters claim of being able to pick and choose the best bear to shoot is blatantly against any kind of fair chase method of hunting. Basically, the bear is lured in with a promise and shot like a sitting duck. There is no chance for it to use its own wiles and intelligence against the hunter because this is nothing like surviving in the wilderness.

Do not allow this to become a precedence. It is not safe, it is not fair hunting. It does not belong in this community.



Submitted By
timi tullis
Submitted On
12/27/2018 6:28:53 PM
Affiliation

Phone
9073214758

Email
timitullis@yahoo.com

Address
17800 Lena Loop
Juneau, Alaska 99801

Hello,

I am writing to support the passing of PROPOSAL 13, 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions AND PROPOSAL 14, 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.

As an avid outdoors person I think it is only common sense to ask trappers to tag their items so that if there is an issue you know who to respond to and check in with.

Most importantly I think that it is vitally important to post signs that indicate that there are traps along a trail. For safety reasons there are requirements for other types of signage so why not for this. It simply makes sense and seems to be a long time coming.

Thank you for considering these.

Timi Tullis



Submitted By
Patrick Valkenburg
Submitted On
9/24/2018 9:23:04 PM
Affiliation

Phone
9076877481
Email
patvalkenburg@gmail.com
Address
3680
NON RD
Fairbanks, Alaska 99709

Comments on Unit 4 (Baranof Island) Goat Management and Unit 3 Deer proposals

By Patrick Valkenburg

Unit 4 Goat Management

A new management strategy for goats was implemented on Baranof Island in 2017. Although there are some advantages for hunters under the new system there are many serious problems, it represents a major change in philosophy that the Board of Game has never supported, a major and unnecessary reduction in goat hunting opportunity, and much more complexity in regulation than is warranted. Furthermore, ADF&G seems to be implementing an extremely conservative approach to goat management throughout Region I and is ignoring previous research on goat biology. **Although there are no proposals for goats in Unit 4, the Board should get Department staff to clearly outline the intent of their new management strategy for goats and make sure it is consistent with Board policy.**

Basic tenets of the new system:

1. Goat harvest will be managed on a 6 points per 100 observed goats philosophy (a billy is 1, a nanny 2).
2. No harvest will be allowed unless there are at least 35 goats seen in a management zone on the most recent survey (sightability of goats is not considered). These zones will be EO closed before the season opens.
3. There will be 34 management zones within the hunt area (RG150).
4. If one nanny is taken in a zone, the zone will be EO closed, regardless of the rate of increase of the goat population, whether winters have been mild, or where the population is in relation to the population objective.
5. If nine nannies are taken island-wide, all goat hunting on Baranof will be closed regardless of the rate of increase in the goat population or where the population is in relation to the population objective.

Potential Advantage of the new system: The previous management scheme for Baranof Island used larger management areas so overharvest in easily accessed areas could result in the closure of a large area. The change to using 34 small management areas potentially limits a closure to smaller area.

Important changes in philosophy incorporated in the new management program. Previously, the Department and the Board have also supported the idea that areas within a species range should be open to hunting unless there are good legal or conservation reasons for them to be closed, and the state has criticized federal agencies for the opposite approach. The new goat management program for goats on Baranof takes a "closed unless open" philosophy. For example, each of the 34 management areas must have a proven goat population of at least 35 goats to be opened. This implies that detailed knowledge of all 34 areas is needed every year, but goat surveys are not conducted every year. **In 2017 and 2018 almost 50% of the RG 150 hunt area was closed to hunting before the season opened.** All of south Baranof has been closed to goat hunting for 2 years. South Baranof is remote, difficult to access, and difficult to survey but has a few big billies in it. Occasional harvest of a few goats in the area would be of no consequence to the population. Reasons for the closures were originally stated as "the areas are inaccessible and have few goats". Goat surveys were not conducted before closures were again implemented in 2018 so these closures were based on 2016 and 2017 data. Typically, sightability during goat surveys is approximately 70%. It is not clear from survey data whether sightability is incorporated in estimating goat numbers in a zone. Also, using "inaccessibility" as a reason to prohibit hunting is a new philosophy not used anywhere else in Alaska.



In addition to closures implemented before the season opens, the zones that are open will be closed if a single nanny is taken. The justification for this is addressed in Frequently Asked Questions on the ADF&G website. Goats are purported to be “slow to reproduce and “vulnerable to overharvest”. These statements are factually and biologically incorrect. Goats are no “slower” at reproduction than sheep or caribou. Goats can produce twins and goat populations can increase at 15% per year when conditions are favorable. Young:adult ratios can commonly be in the range of 20-40:100. Nothing about goat biology justifies these EO closures, especially on islands like Baranof Island and Kodiak where goats are not subject to predation by wolves. Smith (1984)^a reviewed population trajectories in many populations of goats in Southeast Alaska and concluded that harvest has no discernable influence on population growth when weather is mild (winter precipitation mainly falls as rain) and general restrictions on harvest are only needed after periods of severe weather. Smith’s (1984) findings for goats in Southeast were supported by Mooney (2014) for goats on Baranof. Goat populations in many areas of Southeast Alaska have been growing steadily since the end of the last period of severe winters (2006-2012). There are now about 1500 goats on the island—500 more than the population objective (Mooney 2014).

ADF&G Region I seems to be implementing a 6 points per 100 goats harvest strategy regardless of whether or how fast goat populations are increasing and are ignoring the findings of Smith (1984). For example, in the Petersburg area (Unit 1B) from LeConte Bay to Muddy River goat survey unit had about 100 goats in 2002. Under the 6 points per 100 harvest plan the population there increased to about 300 by 2018. During this time the 3 guides operating in the area were often restricted to 1 goat each per year. Clearly, the harvest management program was too conservative and opportunity was lost. Judging by trailing, digging, and other effects on the landscape, goat numbers are likely too high and not sustainable over the long term, and they are probably vulnerable to disease outbreaks. There is no research being done on goats in this area.

Proposing to close goat hunting on all of Baranof Island if 9 nannies are taken represents an absurdly conservative strategy. The current population of goats on Baranof is about 1500 (2017 data) and the management goal was to maintain >1000 goats (Mooney 2014). Biologists could not possibly detect any change in goat numbers if 9 nannies were taken. The number is completely arbitrary, ignores whether goat numbers are increasing or not, and represents collective punishment of hunters for taking nannies.

The ultimate goal of this new management program for goats has not been articulated. It appears to be an effort to ensure that harvest has no effect of goat numbers (i.e. maintaining “natural” populations). The state has criticized both the USFWS and NPS for proposing a similar philosophy with brown bears and other wildlife.

a, Smith, C. A. 1984. Evaluation and management implications of long-term trends in coastal mountain goat populations in Southeast Alaska. Pages 395–424 in Proceedings of Fourth Biennial Symposium of North American Wild Sheep and Goat Council. M. Hoefs, editor. Whitehorse, Canada.

bMooney, P. 2014. Unit 4 mountain goat management report. Pages 65–75 [In] P. Harper, editor. Mountain goat management report of survey and inventory activities 1 July 2011–30 June 2013. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR 2014- 3, Juneau.

Comments are Unit 3 Deer Proposal #46

Deer in much of Unit 3 (Mitkof, Kureanof, and Zarembo Islands) declined to unhuntable numbers following severe winters from 2006 to 2010. Because of its proximity to Petersburg and the relatively accessible road system, the Board restricted deer hunting to the last 2 weeks of October on the Lindenberg Peninsula of Kupreanof Island (one of the main hunting areas for people from Petersburg). Local trappers greatly increased their efforts to take wolves on the Lindenberg Peninsula and were likely successful at temporarily reducing wolf numbers there. By 2015 deer numbers were recovering, and based on aerial survey data, by 2017 deer were abundant on the Lindenberg Peninsula. The 3-year Board cycle resulted in a delay in reopening opportunity on the Lindenberg Peninsula.

Reopening deer hunting opportunity is overdue.

The 3-year Board cycle makes responsive deer management cumbersome in the few areas of Southeast where it is needed. **One solution to this would be to modify this proposal to provide authority for the Department to implement a Conservative, Moderate, or Liberal harvest strategy, depending on previous winter weather and deer numbers on the Lindenberg Peninsula.** (Biologists can now survey deer numbers more accurately prior to the hunting season with the recently developed Alpine Aerial Survey technique, especially on the Lindenberg Peninsula). If the amended proposal is passed, following severe winters and low



aerial survey counts the Area Biologist could implement a Conservative harvest strategy (15 October-31 October-2 bucks). After moderately bad winters and/or moderate numbers of deer found during aerial surveys, a Moderate harvest strategy could be implemented (1 August-31 October-2 bucks), and when deer are abundant (as they are now) a Liberal harvest strategy could be implemented (1 August-15 November-2 bucks).

Access to the southern and northern parts of the Lindenberg Peninsula is poor but access to the central portion is very good because of the 30-mile long Tonka road system. The early season will provide opportunities for alpine deer hunting and some road based hunting with a moderate increase in harvest. Under the Liberal strategy, ending the season on 15 November will provide for greatly increased opportunity during the rut but ensure that deer are not overharvested generally when snow becomes deeper and the rut more advanced. There will doubtless be some local over harvesting along the road system but the areas of poor hunter access to the north and south will provide refugia for bucks. In this regard, the area is similar to Prince of Wales Island where the road system is overharvested but overall harvest is sustainable because of the adjacent areas with poor access. This approach has proven to be sustainable on Prince of Wales (POW) when deer are relatively abundant. The difference is that on POW winters are generally milder, especially on the southern part of the island. Periodic deep snow winters in Unit 3 require occasional but unpredictable changes in harvest management in some areas.



Submitted By
Patrick Valkenburg
Submitted On
11/28/2018 3:52:56 PM
Affiliation

Phone
9076877481
Email
patvalkenburg@gmail.com
Address
3680
NON RD
Fairbanks, Alaska 99709

Supplemental Comments (11/29/2018) by Patrick Valkenburg to the Board of Game on Deer management in Unit 3 (Petersburg area) and Goat Management in Unit 4 (Baranof Island).

Unit 3 Deer: In my first set of comments I suggested modifying **Proposal #46** to provide ADF&G discretion to implement a Conservative, Moderate, or Liberal harvest strategy on the Lindenberg Peninsula of Kupreanof Island. I did not suggest criteria for determining thresholds for the different strategies. I suggest using **30 deer per hour** in the most recent aerial surveys to separate Conservative from Moderate and **60 deer per hour** to separate Moderate from Liberal.

I noticed in the Department comments on the proposal that ADF&G suggests aligning the season and bag limit on Lindenberg Peninsula and Mitkof Island. These two areas are very different. Lindenberg Peninsula has a large, roadless wilderness area on the north end and a large roadless area on the South end. Lindenberg also has 6 or 7 good alpine areas with high quality summer deer habitat. Local overharvest of bucks along the Tonka road system would be mitigated by immigration from adjacent roadless areas.

On the other hand, Mitkof Island is completely roaded with few areas large enough to contain deer home ranges that are not roaded. Mitkof is very accessible with highway vehicles and can be hunted in any weather. Bucks can easily be overharvested on Mitkof.

Unit 4 goat management: In my previous comments about goat management I stated that the whole island would closed if 9 nannies were taken. That idea was dropped. However, zones are still being closed with the harvest of a single nanny. An example of this is EO 01-7-18 issued on 17 September 2018. The EO closed the Red Bluff Bay Mountain Goat Hunt Zone after a single nanny was harvested. The maximum harvest quota for the zone was listed as 5 male goats or 1 female. The EO was necessary to “restrict the harvest to the maximum sustainable level”. Maximum sustainable harvest in this zone is clearly much more than a single female goat. So I believe the EO is illegal. I think ADF&G is vulnerable to a lawsuit over these kinds of EO closures.

The following table shows harvest of goats on Baranof since 2007.

Harvest of Goats on Baranof Island 2007-2017

Year	Males	Females	Total	Approximate Population Size	Fem Harvest % of Pop Size
2007	26	12	38	1400	1
2008	22	10	32		<1
2009	12	19	31	1000	2
2010	16	12	28		1



2011	11	7	18	750	1
2012	17	2	19	855	<0.5
2013	18	2	20	1000	<0.5
2014	14	2	16	1100	<0.5
2015	21	2	23	1200	<0.5
2016	24	1	25	1400	<0.5
2017	24	4	28	1600	<0.5

The only year in which harvest of females was excessive was 2009 after 2 bad winters. Harvest of females has been negligible since 2011. There is no reason for continued extreme measures to control harvest of females.



Submitted By
Patrick Valkenburg
Submitted On
11/28/2018 10:49:49 PM
Affiliation

Phone
9076877481
Email
patvalkenburg@gmail.com
Address
3680
NON RD
Fairbanks, Alaska 99709

Comments on **Proposals 33 and 34** to establish a goat hunt on the Cleveland Peninsula of Units 1A and 1B by Patrick Valkenburg-29 November 2018

I am a Certified Wildlife Biologist and I have observed and surveyed goats on the Cleveland Peninsula since 2004. I have also reviewed historical information on these goats and scientific literature on goat populations in Alaska and other areas of North America. The population of goats on the lower Cleveland Peninsula has fluctuated between 25 and 50 for many years. Sightability is very low because many goats live in suboptimal forested habitat. There is very little good goat habitat there and it is unrealistic to expect the population to grow much beyond 50. Many of the goats are crowded on the two most suitable mountains (one on the extreme north and one on the south of the occupied area). Given the limited habitat and high percentage of kids, it is likely that goats are forced to disperse from the area because of the lack of habitat. Any goats harvested would easily be replaced by recruitment which has historically been high. Most of the animals on the ridges scattered between the northernmost and southernmost mountains are self protected from harvest because they live in forested habitat or in remote areas and would be impossible to find from the ground. It would be impossible to overharvest goats found in these areas.

A drawing hunt with 6 permits issued annually and an expected harvest of 3-5 goats (including an occasional nanny) would be easily sustainable in years when most winter precipitation falls as rain. In the occasional winters when most winter precipitation falls as snow it may be necessary for the Department to close the season for a year or two. Never having a hunt at all would deprive hunters of all opportunity to hunt these trophy goats. The Department's recommendations for maximum harvest of goats (6 points per 100 observed goats) are too inflexible and extremely conservative when most winter precipitation falls as rain. There are many examples of both indigenous and introduced goat populations that increase at 10-15% per year while sustaining harvests of 6 points per 100 when weather is good. Therefore, 6 points per 100 should not always be considered the maximum sustainable harvest.



Submitted By
Vicki Van Fleet
Submitted On
12/27/2018 12:23:11 AM
Affiliation

As a 45 year resident of Alaska I stand opposed to the following proposals: Proposal # 22 would remove hunting quota's for wolves on Douglas Island.....I have a remote cabin on Douglas Island and have never been bothered by wolves - rarely do I have even the chance to spot one. Let's not give another individual the opportunity to decimate the wolf populations in our area. The wolf quota that is currently in existence seemed to be working just fine. I know of many hunters on Douglas who were successful in their deer hunts this fall.

Proposal # 28 would allow bear-baiting stations in the Juneau area. This idea is ridiculous and archaic. The problem exists with citizens not maintains proper storage of garbage. Let's review the City of Juneau's policy on enforcing garbage storage procedures and solve the problem. The responsibility is on human beings - not bears



Submitted By
Tom Wagner
Submitted On
12/28/2018 2:27:10 PM
Affiliation
self

Phone
907-209-4666
Email
tomwagnerak@gmail.com
Address
90 Spruce Street #104
Juneau, Alaska 99801

I urge against adoption of proposal 22. As a 36-year resident of the Juneau area, the idea that we are living in a somewhat "wild" area, with animals such as bears and wolves amongst us, is very important to me, and I think to most residents. We cherish the notion that wolves live in our area. True, this means we accept the idea that these predators do, in fact, prey on deer. To "control" the wolf population to provide more deer hunting opportunities for sportsmen is a losing proposition. We have seen over the history of the west that predator control in the name of protecting domesticated animals, or, in this case, deer hunting opportunities, makes the areas less "wild." In my view, the privilege of living in a more "wild" area, where wolves coexist with humans, outweighs any benefit to be gained by increased deer hunting opportunities. Thank you for considering my opinion.

Sincerely,
Tom Wagner

Submitted By
Tom Wagner
Submitted On
12/28/2018 2:36:02 PM
Affiliation
self
Phone
907-209-4666
Email
tomagnerak@gmail.com
Address
90 Spruce Street #104
Juneau, Alaska 99801

As a long-time Juneau resident, I urge against adoption of proposal #23. The proposal would open Mount Bullard, Thunder Mountain, Heintzelman Ridge, all of Blackerby Ridge, Mount Juneau, Mount Roberts and areas in between to mountain goat hunting. I like the idea of living in a somewhat wild area, where there is an opportunity to view these magnificent creatures. To open the area to goat hunting would diminish the opportunity for residents to have that viewing experience, in the interest of providing hunting opportunities to a number of sportsmen. In my view, the viewing opportunity for the many should outweigh the hunting opportunity for the few. Thank you for considering my opinion.

Sincerely,
Tom Wagner



Submitted By
Tom Wagner
Submitted On
12/28/2018 2:44:01 PM
Affiliation
self

Phone
907-209-4666

Email
tomwagnerak@gmail.com

Address
90 Spruce Street #104
Juneau, Alaska 99801

I urge against adoption of proposal #28. The proposal would require issuance of permits to hunt bear over bait or scent in unit 1C. I believe bear baiting for hunting purposes violates principles of fair chase. It would also, by habituating the bears to human-provided food and scents, increase the garbage bear problem in densely-populated Juneau. It is better for both bears and people if bears do not associate food with human presence and activities. Thank you for considering my opinion.

Sincerely,

Tom Wagner



Submitted By
Vic Walker
Submitted On
12/28/2018 11:45:43 AM
Affiliation

Phone
907-321-1321

Email
vicwdvm@gmail.com

Address
890 Mendenhall Peninsula Rd
Juneau, Alaska 99801

As a longtime resident of Southeast Alaska, I strongly support proposals 13 and 14. I believe that these minor changes to the trapping regulations would have a positive effect on the community and help prevent accidental injuries to domestic dogs.



From: Margo Waring
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Comments on proposals #22, 23, 28
Date: Sunday, December 23, 2018 5:25:27 PM

Name: Margo Waring

Address: 11380 North Douglas Highway, Juneau, AK 99801

Hunting license holder

Regarding Proposals:

OPPOSE

PROPOSAL : #22. REMOVE HUNTING QUOTA ON DOUGLAS ISLAND WOLVES

This would eliminate the Douglas Island Management Area in GMU 1-C, removing the annual 3 wolf harvest quota for The goal of the existing regulation was to guard against over harvest of wolves on the island, something that can occur because of easy road and boat access.

I live “out the road” on the North Douglas Highway. It has taken a long while to see wolves again after that trapper killed them all. We were glad that the Game Board recognized that wolves had a place on Douglas Island. We appreciate seeing them from time to time and want to keep it that way.

OPPOSE

PROPOSAL #23: ALLOW ARCHERY HUNTING OF MOUNTAIN GOATS ON MT JUNEAU AND NEARBY AREAS

I remember very clearly the time in the 1980s when goats had disappeared from Mt. Juneau and surrounding areas and at great expense goats were transplanted from the Snettisham area. It is wrong to undo what has taken so long to achieve—goats that can be seen in spring and summer, visible for local people as well as tourists. Road accessible hunting areas are available for Mountain Goat hunting and this area is not needed to also be open.



OPPOSE: PROPOSAL #28: ALLOW BEAR BAITING IN JUNEAU

At our end of the North Douglas Highway, each home is visited by bears each summer. But we are very careful to leave nothing edible around. The idea that ADF&G would habituate bears to food by baiting is incredible to me. Further, any hunter who would stoop to tricking a bear in order to kill it is not worthy, in my opinion, of a hunting license.



Submitted By
Cody Wegener
Submitted On
11/12/2018 9:06:59 PM
Affiliation

Phone
9075180143
Email
cwtroller@yahoo.com

Address
PO BOX 2078
Petersburg, Alaska 99833

I would like to comment against proposal 12. Its not that hard to get a permit and this could cause people to target non-problem beavers outside of prime fur times possibly causing a decline in prices from the area.

I would like to comment against proposal 14. I would agree with bringing back the trap tag requirement but requiring signs to be visibly posted within 50 yards of sets would bring an increase in the theft, and tampering with, of traps and snares.

I would like to comment in support of proposal 15. I would support an extension of the waterfowl season to January 15. I don't think it needs to be extended into february though. Too long of a season could cause problems between trappers and hunters. Most trappers won't set beach sets for wolves until the waterfowl season ends to avoid catching dogs. Too long of a waterfowl season would force trappers to risk it for fear of missing out on half the season.

I would like to comment in partial support of proposal 16. I think the season should open for geese, cranes, and snipe on september 1st when these birds are more plentiful. However I believe that the season for ducks should remain the same, if not extended, since mallards are more plentiful later in the season. A few states have split openings, usually for early season teal, without incident and I believe that it would work here in Alaska as well.

I would like to comment in support of proposal 45. The extension of this season would allow for more hunting opportunities for locals without the means to safely travel further away from the area after our short season.

I would like to comment in support of proposal 46. The extension of this season would allow for more hunting opportunities for locals without the means to safely travel further away from the area after our short season.

I would like to comment in support of proposal 53. The change in regulation would allow hunters to target deer closer to town as intended. With the current regulations you can't hunt the deer that could potentially cause problems or hazards.

Thank you for allowing me to comment on these prosals and I hope my comments are taken into consideration.



Submitted By

Lisa

Submitted On

12/26/2018 10:11:22 AM

Affiliation

Self

Proposal 22: Object. Lifting the annual three-wolf quota inevitably will result in the wholesale slaughter of wolves on Douglas Island. As previously determined by the Board of Game, wolves are part of a healthy ecosystem in reasonable numbers. Retain the existing limit.

Proposal 23: Object. I and many other Juneauites and visitors have the privilege of viewing goats on Mount Juneau and Mount Roberts. The goats are a public resource that should not be killed for the benefit of a few private individuals. Retain the existing hunting closure.

Proposal 28: Object. Besides being offensive to moral hunting methods, allowing bear baiting in a populated area makes no sense. We are subject to \$100 fines for putting out our garbage too early or creating an attractive nuisance for bears - all to avoid acclimating bears to human food. Bear bating will only exacerbate the problem as well as leading to trauma and outrage in the community. Retain the existing restriction on bear baiting.



RECEIVED

DEC 18 2018

BOARDS
ANCHORAGE

Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526

Comments to 2018/2019 Proposed Changes to Regulations

From Brian West
1000 Oceanview Drive
Anchorage Alaska 99515

Southeast Region

Proposal 2. OPPOSE. Basically, this would allow individuals to bait deer. Does the proposer envision placing his feeding station just outside his meat shed?

Proposal 3. OPPOSE. This is wasteful. The small amount of meat recovered should not be a reason for its waste. Additionally, the proposer is concerned about bear encounters while removing the rib meat, these animals are extremely small and the entire rib cage can easily be removed from the field. There is no need to spend time in the field removing the meat from the ribs.

Proposal 6. SUPPORT. Bear meat is excellent if handled properly. When a hunter is only interested in the hide there is no incentive to care for the meat. Improper handling is the reason the meat might be bad. Priority should be given to meat salvage.

Proposal 8. SUPPORT. The statement accompanying the proposal is all that needs to be said.

Proposal 9. OPPOSE. What is the issue they are trying to solve?

Proposal 13. SUPPORT. Why was this changed in the first place? If a trapper is afraid of some sort of repercussions from having his name and other identifying information on a trap then an identifying number supplied by the Department of Fish and Game could be used.

Proposal 14. SUPPORT.

Proposal 17. SUPPORT. The Board has no authority to limit hunting to a particular user group of residents. However, they do have the authority to limit methods and means, the Board should ban commercially guided hunts in the area identified.

Proposal 19. SUPPORT. I agree with the reasoning laid out in the proposal.

Proposal 21. SUPPORT. Easily identifiable geographic boundaries should be used as much as possible.

Proposal 25. OPPOSE. This proposal is blatantly discriminatory.

Proposal 30. OPPOSE. Nothing prohibits youth from hunting during this time frame now, why is it that all others need to be banned from hunting during this time? Additionally, the proposer states that there are barriers to youth hunting. There are no barriers to youth hunting. This proposal only bans adults from hunting. I also fail to see how this proposal would eliminate the perceived overcrowding. As it



stands now a 16 or 17 year old could go hunting by themselves, this proposal would require they bring along an adult, increasing the numbers of people in the field.

Proposal 31. OPPOSE. Completely submerged is a nebulous term, a trap covered by half an inch of water meets the definition.

Proposal 32. SUPPORT. This would benefit all trappers in the long run. As the state population grows, incidents involving pets/people and traps will be used as a way to limit or ban trapping. Taking steps to minimize conflicts will only help maintain trapping in Alaska.

Proposal 37. SUPPORT.

Proposal 43. OPPOSE. I fail to understand how the HGL inhibits the ability of the Department to manage the wolf population? Their new approach seems destined to destroy the wolf population in the area. If the 14 day sealing requirement has failed to keep the harvest to within the HGL, they should shorten the reporting time. Or require harvest reports within three days and maintain the 14 day sealing requirement. In a hunt that appears to be a general hunt how can the department expect to keep the population within a specific range? They did not identify what this range should be. Instead of having a general hunt where the limit is 5 wolves, I would suggest a permit system. This would insure that not too many wolves are taken.



Submitted By
Sandy R. Williams
Submitted On
12/19/2018 12:07:32 PM
Affiliation

Phone
2532663619

Email
srwilliams@gci.net

Address
3179 Pioneer Ave.
Juneau, Alaska 99801

I have been hiking for over 30 years on the Juneau ridges. We love seeing the goats when we hike. I do not feel they are overpopulated at this time. Some areas have more than others. Please do not open more areas in Proposal 23 to goat hunting. I would not feel as safe knowing bow hunters are also out there.

And I know accidents happen. Years ago in WA my brother was deer hunting and another hunter shot him, though with a gun. 3 surgeries later and he did survive.

Thanks Sandy



From: Hannah Wilson
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Comments on Proposals 22, 23, and 28
Date: Monday, December 24, 2018 2:33:48 PM

To the Alaska Board of Game,

My name is Hannah Wilson, my residence is Juneau, Alaska, mailing address is [175 S. Franklin Street, #300, Juneau, Alaska 99801](#).

I was born and raised in Juneau and grew up hunting around Southeast as well as hiking, kayaking, and watching wildlife. Currently I guide brown bear viewing trips at various places in Southeast along with being an avid sport hunter. I strongly support fair chase of game as it is humane, respectful of the animals we hunt, and creates sustainable harvest that will continue to provide abundant hunting opportunities for future generations.

I would like to comment on three upcoming Board of Game Proposals to be heard in Petersburg, [January 11-15](#) on proposed game regulation changes in the Juneau game hunting areas.

The proposals are #22, #23 and #28.

PROPOSAL : #22, REMOVE HUNTING QUOTA ON DOUGLAS ISLAND WOLVES.

OPPOSE – My family hunts deer on the back side of Douglas and unfortunately, has never had a wolf contact. We have seen wolf sign and this always makes us feel excited to know there are wolves about. We have shot our share of deer on Douglas and feel that having wolves on the island is part of the fair hunt. Knowing there are wolves around adds to the wilderness and Alaskan experience. We do not support eliminating the Douglas Island Management Area in GMU 1-C and removing the annual 3 wolf harvest quota for the island. Our family feels strongly that reasonable numbers of wolves have a place on Douglas island, and that the public is well served to know that the island is wild, has wolves and that there is a chance that wolves can be seen and enjoyed by all who venture out into the wilderness. Please keep the 3 wolf harvest quota in place on Douglas Island. It works well and does not need to be changed.

PROPOSAL #23: ALLOW ARCHERY HUNTING OF MOUNTAIN GOATS ON MT JUNEAU AND NEARBY AREAS

OPPOSE – We strongly oppose additional archery hunting of mountain goats on Mount Juneau, Mount Roberts, and the entire Juneau area from Mendenhall river/glacier to Taku river/glacier. We live in downtown Juneau. We can look up and see the Mount Juneau goat herd on most days. All summer long, we hike the high mountain ridges in the new proposed hunting areas with the goals to see mountain goats. As locals, we are proud to show the goats to our many visitors, this is the first time many SE Alaska visitors have ever seen mountain goats. We are very fortunate to be able to see goats along the Juneau road and trail system. Unlike Alaska's more remote goat areas, our local goats see summer hikers in close proximity and do not run away. This is not a fair chase or sporting. We like to see mountain goats in the wild. The Mount Juneau area goat population is better used for wildlife viewing and non-



consumptive enjoyment of goats without additional pressure from hunting. The value of goats for viewing for our local population and summer visitors is obvious. There are other hunting areas around Juneau that are more remote to accommodate goat hunters. Please do not change or increase the current mountain goat archery areas in Juneau.

PROPOSAL #28: ALLOW BEAR BAITING IN JUNEAU

OPPOSE: We strongly oppose allowing in the Juneau area (1C) any black bear baiting at bait stations. Baiting black bears as a hunting method is not fair chase and is unworthy of bear hunters. It sets up a very unsportsman like example of bear hunting to most hunters and non-hunters alike. Juneau has densely populated neighborhoods and downtown areas. We have bears in all the neighborhoods due in a very limited building areas surrounded by mountains. Allowing bear baiting has the direct possibility of causing bears to become accustomed to human food, more bear-human conflicts, and pushing bears to become garbage bears. Luring bears to bait stations with human food seems like a bad hunting policy for Juneau and has no place in a fair bear hunt. We oppose this change.

Thank you for allowing me to send in my comments to the Alaska Game Board. Please let me know if you have any questions on my comments.

Sincerely,

Hannah Wilson



From: Jeff Wilson
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Comments on upcoming Alaska Board of Game Proposals before deadline of December 27, 2018
Date: Monday, December 24, 2018 1:34:53 PM

Dear Alaska Board of Game,

My name is Jeffery Wilson, my residence is Juneau, Alaska, mailing address is 175 S. Franklin Street, #300, Juneau, Alaska 99801.

I have lived and hunted in the Juneau area and Southeast Alaska for over 40 years. I am an avid sport hunter and support the fair chase of hunting game in SE Alaska. It feels wrong that there is no direct representation on the Alaska Game Board from SE Alaska and specially Juneau, Alaska's capital city, so that we can contact directly our representative with our concerns and comments.

I would like to comment on three upcoming Board of Game Proposals to be heard in Petersburg, January 11-15 on proposed game regulation changes in the Juneau game hunting areas.

The proposals are #22, #23 and #28.

PROPOSAL : #22, REMOVE HUNTING QUOTA ON DOUGLAS ISLAND WOLVES.

OPPOSE – Our family hunts deer on the back side of Douglas and unfortunately, has never had a wolf contact. We have seen wolf sign and this always makes us feel excited to know there are wolves about. We have shot our share of deer on Douglas and feel that having wolves on the island is part of the fair hunt. Knowing there are wolves around adds to the wilderness experience. We do not support eliminating the Douglas Island Management Area in GMU 1-C and removing the annual 3 wolf harvest quota for the island. Our family feels strongly that reasonable numbers of wolves have a place on Douglas island, and that the public is well served to know that the island is wild, has wolves and that there is a chance that wolves can be seen and enjoyed by all who venture out into the wilderness. Please keep the 3 wolf harvest quota in place on Douglas Island. It works well and does not need to be changed.

PROPOSAL #23: ALLOW ARCHERY HUNTING OF MOUNTAIN GOATS ON MT JUNEAU AND NEARBY AREAS

OPPOSE – We strongly oppose additional archery hunting of mountain goats on Mount Juneau, Mount Roberts, and the entire Juneau area from Mendenhall river/glacier to Taku river/glacier. We live in downtown Juneau. We can look up and see the Mount Juneau goat herd on most days. All summer long, we hike the high mountain ridges in the new proposed hunting areas with the goals to see mountain goats. As locals, we are proud to show the goats to our many visitors, this is the first time many SE Alaska visitors have ever seen mountain goats. We are very fortunate to be able to see goats along the Juneau road and trail system. Unlike Alaska's more remote goat areas, our local goats see summer hikers in close proximity and do not run away. This is not a fair chase or sporting. We like to see mountain goats in the wild. The Mount Juneau



area goat population is better used for wildlife viewing and non-consumptive enjoyment of goats without additional pressure from hunting. The value of goats for viewing for our local population and summer visitors is obvious. There are other hunting areas around Juneau that are more remote to accommodate goat hunters. Please do not change or increase the current mountain goat archery areas in Juneau.

PROPOSAL #28: ALLOW BEAR BAITING IN JUNEAU

OPPOSE: We strongly oppose allowing in the Juneau area (1C) any black bear baiting at bait stations. Baiting black bears as a hunting method is not fair chase and is unworthy of bear hunters. It sets up a very unsportsman like example of bear hunting to most hunters and non-hunters alike. Juneau has densely populated neighborhoods and downtown areas. We have bears in all the neighborhoods due in a very limited building areas surrounded by mountains. Allowing bear baiting has the direct possibility of causing bears to become accustomed to human food, more bear-human conflicts, and pushing bears to become garbage bears. Luring bears to bait stations with human food seems like a bad hunting policy for Juneau and has no place in a fair bear hunt. We oppose this change.

Thank you for allowing me to send in my comments to the Alaska Game Board. Please let me know if you have any questions on my comments.

Sincerely,

Jeffrey Wilson

Jeffrey W Wilson

175 S Franklin St, #300

Juneau, AK 99801

(W) 907-586-2100

Cell: 907-321-3210

jwilson@wileng.net



From: Karen Wilson
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Comments for Board of Game meeting Jan. 11-15, 2019
Date: Wednesday, December 26, 2018 7:26:54 PM

December 26, 2018

To the Alaska Board of Game:

My name is Karen Wilson, mailing address 175 S. Franklin #300, Juneau, residence 226 Sixth Street, Juneau.

I am writing in opposition to three proposals currently before the Board and concerning the Juneau vicinity (Unit 1-C). The involved regulations were originally adopted due to particular conditions unique to the Juneau area. Those conditions have not changed, other than to have possibly intensified, making the original regulations even more appropriate.

PROPOSAL : #22, REMOVE HUNTING QUOTA ON DOUGLAS ISLAND WOLVES

I am adamantly opposed to removing the annual three wolf harvest quota on Douglas Island. I hike on various parts of the island on a regular basis, and while I see deer sign or occasionally a deer, I have never come across a wolf or wolf sign. And I would love to! I am not a hunter, and I highly value wildlife sightings. The hunters in my family are also opposed to killing more wolves. They are satisfied with their deer hunts on Douglas and feel it is a fair and balanced situation to have a healthy wolf population. Easy access to much of the island leaves the wolf population vulnerable to being decimated, as has happened in the past.



PROPOSAL #23: ALLOW ARCHERY HUNTING OF MOUNTAIN GOATS ON MT JUNEAU AND NEARBY AREAS

I oppose opening the area from the Mendenhall Glacier to the Taku Glacier to archery hunting. I was present (and thrilled) on the road below Mt. Juneau when goats from the Snettisham area were re-introduced in the 1980s. And I have been further thrilled to witness the gradual increase of goats in the area. I regularly walk Basin Road, hike the Mt. Juneau ridge, hike the area above the tram and beyond, and hike and ski around Mendenhall Lake. It is always a delight to see goats, and I love sharing that delight with visitors all summer long. Goats in all these areas are a huge highlight for visitors (who in turn give a huge boost to our local economy.) We have an unusual situation where humans and goats co-exist in the same area, and are acclimated to each other's presence. Hunting these goats would not be sporting/fair-chase, and their highest and best use for locals and visitors is to view them in their natural habitat. There are accessible, but more remote areas available to hunters.

PROPOSAL #28: ALLOW BEAR BAITING IN JUNEAU

Bear baiting must not be allowed in the Juneau area. As a downtown resident, I see more bears in my yard than I ever see in the wild and they are there for one reason--they are looking for human food. Feeding bears at bait stations will only make a serious problem worse. Our population and the bear population are restricted by geography, and we do not need any extra encouragement for bears to join us, our children and our pets in our yards. In addition, the hunters in my family are in complete agreement with me that bear baiting is in total opposition to fair-chase hunting practices. It is about as sporting as shooting a cow in a pasture.



I appeal to the Board of Game to keep these existing, long-standing regulations in place out of respect for ALL wildlife users.

Sincerely,

Karen Wilson

Juneau



From: Mary Willson
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: proposals 22, 23, and 28
Date: Wednesday, December 26, 2018 9:01:27 AM

I vehemently oppose all three proposals.

Bear baiting is not sporting, in any sense. Furthermore, we have enough problems with local bears getting habituated to human food. This is a really bad idea.

The Douglas wolves have been persecuted for years and barely have time to recover before somebody wants to kill again. That spoils the fun for the many local folks who enjoy hearing them sing and seeing their tracks in the snow. There are deer tracks all over the island (I have seen them) and the deer population is in no danger from wolf predation. Ha...humans kill lots more of them than the wolves do. There are plenty of deer out there for human hunters.

As for the mountain goats near the glacier and in the general area: these animals give visitors and locals a great deal of pleasure, for example watching them near Nugget Falls. The large number of people that enjoy the living animals far outnumber a few blood-hungry archers who would reduce the goat population and diminish the fun for all the rest of us.

All three proposals are bad ideas for the Juneau area.

Mary F. Willson
Ecologist
Juneau AK



From: Maia Wolf
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Written Comments for Proposals 22, 23, and 28
Date: Thursday, December 27, 2018 9:01:55 AM

Dear Alaska Board of Game,

My name is Maia Wolf, and address is 424 First Street, Juneau AK, 99801.

I moved to Juneau six years ago to work as an outdoor educator, and continue to be in awe with the area each time I take people into the wilderness. I have had the privilege to live in many beautiful places, but Juneau has been special to me since the moment I arrived. One of the things I value most about living in Juneau is the relationship between the human residents and the wildlife that lives in and around the city. To have found a community that has worked so hard and made so much space for the non-human inhabitants of the land is the primary reason that I continue to love the area. The admiration and respect for the animals that we recreate around and hunt are essential to this relationship.

I am writing to you to oppose three upcoming proposals that I believe will have severe negative impacts on the Juneau area. The three proposals are #22, #23 and #28.

PROPOSAL : #22, REMOVE HUNTING QUOTA ON DOUGLAS ISLAND WOLVES.

OPPOSE – During work trips to Douglas, we have found many traces of wolves (although unfortunately no sightings), and this has led to numerous wonderful discussions. Students are excited to know that there are still animals like wolves living in their backyard. It provides a great opportunity to discuss balanced ecosystems and predators and prey relationships, and it has sparked interest in biology and outdoor recreation in children that would otherwise spend their day in front of a screen. From a personal standpoint, I love knowing that we share that land with wolves. That we compete against them when we hunt for deer, that they know where we are and how we move,. I do not support eliminating the Douglas Island Management Area in GMU 1-C and removing the annual 3 wolf harvest quota for the island. Please keep the 3 wolf harvest quota in place on Douglas Island.

PROPOSAL #23: ALLOW ARCHERY HUNTING OF MOUNTAIN GOATS ON MT JUNEAU AND NEARBY AREAS

OPPOSE – I strongly oppose additional archery hunting of mountain goats on Mount Juneau, Mount Roberts, and the entire Juneau area from Mendenhall watershed to



Taku watershed. Mountain goats are an important part of the Juneau tourists' experience: tourists can see them from the docks, they are often spotted on tours, and people who hike the trails on the ridges often get the opportunity to see them up close. As for locals, we love our mountain goats. They are often part of everyday discussion, and we love to watch their movements from our homes, cars, and coffee shops. With the additional archery hunting, Juneau mountain goats will become more weary of humans, and our opportunities for seeing them will decrease drastically. Please do not change or increase the current mountain goat archery areas in Juneau.

PROPOSAL #28: ALLOW BEAR BAITING IN JUNEAU

OPPOSE: We strongly oppose allowing in the Juneau area (1C) any black bear baiting at bait stations. Juneau works hard to make sure that black bears do not come into contact with human food, which helps avoid nuisance or aggressive bears. By allowing bear baiting, it is a distinct possibility that bear-human conflicts will increase in frequency and severity. Additionally, I believe it to be unsportsmanlike to lure bears out with human food for the purpose of hunting. I strongly oppose this proposal.

Thank you for allowing me to send in my comments to the Alaska Game Board. Please let me know if you have any questions on my comments.

Sincerely,

Maia Wolf



Submitted By
Doug Woodby
Submitted On
12/27/2018 10:57:59 AM
Affiliation

PROPOSAL 22 5 AAC 92.530(23). Management areas.

I am opposed to this proposal. The current management restricting the annual harvest of wolves on Douglas Island is appropriate and should continue. Past history has demonstrated that it is possible to overharvest wolves on Douglas Island. The current management restrictions are a good compromise among the competing interests.

Submitted By
Doug Woodby
Submitted On
12/27/2018 10:53:07 AM
Affiliation

PROPOSAL 28 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures.

I am opposed to this proposal. Using attractants to lure bears has the unintended consequence of bears becoming accustomed to human provided foods. This practice is particularly ill-suited to Area 1C where the steep topography concentrates a dense human population that already has a garbage bear problem.

Submitted By
Doug Woodby
Submitted On
12/28/2018 12:37:56 PM
Affiliation

PROPOSAL 23 5 AAC 85.040(a)(1). Hunting seasons and bag limits for goat.

I am opposed to this proposal.

The areas proposed to be open to archery hunting of goats are heavily used by hikers, including residents and tourists who enjoy seeing goats in relatively close proximity. If this proposal passes, won't those goats be chased into the backcountry and no longer readily available for the majority of trail users to see and enjoy? That seems like a high price to pay for the meager benefit bestowed on a few archery hunters who have other areas on the road system where they can hunt goats.



Submitted By
Brenda Wright
Submitted On
12/26/2018 4:12:55 PM
Affiliation

Phone
907-789-4656

Email
bewright@gci.net

Address
17430 Andreanoff Dr
Juneau, Alaska 99801

PROPOSAL : #22, REMOVE HUNTING QUOTA ON DOUGLAS ISLAND WOLVES

Please do not eliminate the Douglas Island Management Area in GMU 1-C, removing the annual 3 wolf harvest quota for the island. This Management Area was set up years ago to restrict the number of wolves that could be killed on Douglas Island to no more than 3 a year. The goal of the existing regulation is to guard against over harvest of wolves on the island, something that can occur because of easy road and boat access. Wolves on Douglas Island are a natural part of the ecosystem. A small population will not affect my ability to also hunt deer on Douglas Island. Please do not change the wolf harvest number on Douglas Island.

Submitted By
Brenda Wright
Submitted On
12/26/2018 4:21:58 PM
Affiliation

Phone
907-789-4656

Email
bewright@gci.net

Address
17430 Andreanoff Dr
Juneau, Alaska 99801

PROPOSAL #23: ALLOW ARCHERY HUNTING OF MOUNTAIN GOATS ON MT JUNEAU AND NEARBY AREAS

Please do not change the present archery hunting regulation for this area. I worked for tourism for over 9 years and the goats on Mt. Juneau and Mt Roberts were the most exciting wildlife many tourists had yet seen. The possibility of seeing goats from street level in a state capitol is a point of pride for many residents.

As you all know, several areas in close proximity to the Juneau road and trail system are used by people who enjoy seeing mountain goats in the wild. In fact, it is the only chance many will ever have.

The fact that the goats were gone for many years and finally have re-established themselves in view of downtown is a special treat for residents and visitors. Please do not allow hunting of this small area. A unique experience like goat viewing is truly unusual. Please do not allow hunting to change their range or use of the mountains in downtown.

There are alternative hunting opportunities in the more remote parts of the Juneau area to accommodate goat hunters— the mountains and drainages north and west of Mendenhall river are open, for example, and accessible from the road system. The value of goats for viewing for our local population and summer visitors is obvious.



Submitted By
Brenda Wright
Submitted On
12/26/2018 4:32:29 PM
Affiliation

Phone
907-789-4656

Email
bewright@gci.net

Address
17430 Andreanoff Dr
Juneau, Alaska 99801

PROPOSAL #28: ALLOW BEAR BAITING IN JUNEAU

As a 36 year resident of Juneau, I am very concerned about this proposal. During the 1980's many, many bears were killed in Juneau due to getting into human garbage. It took many years to finally revise the city ordinances so that humans were responsible for keeping trash safe from bears. There is no safe place to start baiting bears without training a new generation of bears to hunt for human food once again. As a hunter myself, I do not understand the procedure for "hunting" a bear attracted to your hunting site. There are no species that I enjoy hunting that I do not go into their environment to seek them out. Please do not start an old problem over again in Juneau by allowing bear baiting in our city & borough. We do not need to train bears to eat or expect human food from us. Bears are only healthy when they eat their natural foods. Hunters who are unable to seek out their prey should try a different place to hunt besides Juneau.



Submitted By
Susan Arthur
Submitted On
12/27/2018 3:02:13 PM
Affiliation

Phone
9077893764

Email
huntres@gci.net

Address
PO BOX 32662
9335 View Dr.
JUNEAU, Alaska 99803

Leg-hold and conibear traps should be tagged with name and license number of owner. Reason being to identify, and report to ADF&G, any traps that are left sprung or unsprung in field after the close of trapping season. This tagging would also allow individuals to report traps that are set in areas closed to trapping.



Submitted By
Elisabeth Babich
Submitted On
12/27/2018 1:54:56 AM
Affiliation

Phone
9072094693
Email
ketasissi@gmail.com
Address
P.O.Box 20571
Juneau, Alaska 99802

It's very disturbing that currently none of the members of this 7 member board are from Southeast Alaska, and none of the present board members were on the board when these regulations originally passed. I can't ever remember not having any representation from SE Alaska on this board.

I am adamantly opposed to the archaic use of bait to attract bears in order to shoot them. Cowardly lazy hunters.

Hunting and trapping the wolves on Douglas Island is also just so lazy hunters don't have to work hard on getting a deer. It is not like it is a subsistence area and important to put food on the table.

So NO to both issues, NO to bear baiting and NO to wolf hunting on Douglas Island. Who is running this state anymore ? Really!



Submitted By
Maren Brantner
Submitted On
12/11/2018 10:33:27 AM
Affiliation

I would like to voice my support for Lauri Jemison's proposal to reinstate trapping identification.

Being able to properly identify hunting traps that are being attended and have illegally been left behind neither presents an undue hardship nor places a greater burdern on trappers than any other hunter/fisher in Alaska.

As a hiker, outdoorsperson, and dog guardian, I would appreciate any and all efforts to hold hunters accountable for their gear, behavior, and practices. Trapping identification benefits and protects hunters and the outdoor community, including its wild animals.



Submitted By
Dick Farnell
Submitted On
12/21/2018 12:25:27 PM
Affiliation

Do not allow expansion of bow hunting for goats to include the mountains surrounding Juneau. Once the goats find out they are threatened they will leave the area, and local residents and tourists will no longer be able to view goats from down in town.



Submitted By
Carter Gueller
Submitted On
12/14/2018 12:10:34 PM
Affiliation

I would like to vote yes to extend the hunting season for deer on Mitkof Island and surrounding areas. It doesn't make sense that we're the only area with such short seasons. I am a fisherman and the 2 weeks isn't enough time to get a deer. I need to provide for a family of 5 and more time would be extremely beneficial to our winter stocks.



Submitted By
Kerry
Submitted On
12/11/2018 9:35:55 AM
Affiliation

Phone
9077238449

Email
kmhejira@yahoo.com

Address
17355 Glacier Highway
Juneau, Alaska 99801

I fully support the proposal to reinstate the requirement for identification tags for traps and snares in Southeast Alaska: "In Unit 1–5, trappers are prohibited from using a trap or snare unless the trap or snare has been individually marked with a permanent metal tag upon which is stamped or permanently etched the trappers name and address or the trapper's permanent identification number." Trappers need to be held to a similar standard as shrimpers and crabbers. Should there be an issue with their gear, Alaska State Troopers need to be able to easily enforce trapping regulations and seasons. I personally have witnessed problems with traps and urge you to support this change. Thank you.

Submitted By
Kerry Howard
Submitted On
12/21/2018 6:55:13 PM
Affiliation

Phone
723-8449

Email
kmhejira@yahoo.com

Address
17355 Glacier Highway
Juneau, Alaska 99801

I oppose the proposal to expand the archery only permit hunt area in Unit 1C. I believe that ample opportunity to hunt goats in this manner already exists and that mountain goats, particularly in the Mendenhall River drainage, do not need this added pressure.



Submitted By
Teresa
Submitted On
10/15/2018 11:53:03 AM
Affiliation

Phone
907-227-3415

Email
teresahunt75@gmail.com

Address
P.O. Box 471
Yakutat, Alaska 99689

It is imperative that trappers put their name and license number on their traps. I have caught an injured bald eagle that had been caught in a trap outside of trapping season. I sent the eagle to the Sitka Raptor Center, the bird was unable to be saved and they had to put the injured bird down. This is just one example of a reason why it is important to know who owns the trap.

Additionally, I hike a lot with my little dog, and have found numerous traps out of season that were set. These traps could have killed my dog and I would like to know who has set traps in or out of season that could kill or injure pets.

Please reinstate the regulation requiring all trappers to put their name and license number on the traps.



Submitted By
Joshua Ivaniszek
Submitted On
12/27/2018 8:25:13 PM
Affiliation

Regards to hunting closures around Greens Creek Mine.

I have actively hunted this area since 2006. I also worked for Greens Creek Mine from July 2008 to October 2014. During that time I heard about more deer being hit by mine traffic than collected by hunters. I have used bikes and trailers for access several years. Typically I don't run into other groups of hunters. When I do they are Greens Creek employees communicating with mine traffic.

If the mine wants to close the area around the Hawk Inlet port I don't see the problem it's private property.

The mine site is 8 1/2 miles from the road junction and the Hawk Inlet port. If the mine wanted to close an area within a 1/2 mile of the mine and mill site that would be reasonable. Closing everything around the road is unacceptable.

This past year the mine had some unfortunate bear problems. Closing hunting in the area will only increase the bear issues.



Submitted By
Courtney Johnson
Submitted On
12/14/2018 12:08:40 PM
Affiliation

Phone
9077384787

Email
cjohnson5047@yahoo.com

Address
410 mitkof hwy
petersburg, Alaska 99833

I would like to vote yes to extend the hunting season until November 15th. I've hit a few deer in the past year, and by opening the season longer could help our drives out the road. We have FAR too many deer lingering around town and on the sides of the road. Opening the seasons around Petersburg, could also help locals fill their freezer for the cold winter nights. Please consider extending the season!



Submitted By
Trevor McCay
Submitted On
11/18/2018 1:32:19 PM
Affiliation
Petersburg resident

Proposal for GMU 3 Mitkof Island Sitka black-tail season.

I am proposing that the Sitka black-tail rifle season on Mitkof Island be extended 2 more weeks, which would make the season October 15th - November 14. Or change the dates of the current season from October 15th - October 31st, to Nov 1st - 14th.

The current season on Mitkof Island makes it very hard to hunt Sitka black tail. 9/10 times we the residents of Petersburg get stuck with our deer season in the pre Rut phase. I took this next paragraph from an expert Sitka black tail hunter and I believe he is correct. "The deer disappear during this time. I believe that the bucks are resting and determining the last of the dominance hierarchy. The does wean their fawns and their hormones must be changing towards estrus. Movement is limited or at night. If I take a good buck during this time I believe it to be a great accomplishment"

Why is our season during the hardest time to find a Sitka black tail? Most of us are hunting to fill the freezers and feed ourselves and loved ones. It should not have to be a great accomplishment to feed our family. I am not proposing a change to the number of deer allowed it is 1. I am asking to get the season changed so 9/10 times we are hunting the chasing stage and the Rut.

Thank you for your time

Trevor Mccay



Submitted By
Judy Neary
Submitted On
12/21/2018 10:33:32 AM
Affiliation

Phone
907-321-3730
Email
freerain101@gmail.com
Address
17735 Pt. Stephens Spur
Juneau, Alaska 99801

December 21, 2018

Dear Board of Game,

I have been a Juneau resident since 1982 and appreciate the beauty of our environment. I am lucky to still be able to hike mountains and watch wildlife. There is nothing so thrilling as to summit a mountain or hike a ridgeline and watch goats and bear.

I recently heard there is a proposal to open areas around Juneau to bow and arrow hunting of goats. The thought of this is appalling. A beautiful animal at risk of dying due to human greed/trophy has no place in our community. Also over half a million tourists come to our town each year and probably a quarter of them hike out to Nugget Falls to enjoy the view of the glacier, falls and goats up on the ledge. This summer, a friend dying of brain cancer took a flight seeing tour and fulfilled his dream of seeing goats on a ridge!

Please consider the desires of thousands of Juneau residents who prefer to take pictures and watch these majestic animals through their spotting scope over the few bow hunters desires to bag an animal.

Sincerely,

Judy Oyama Neary



From: Jim Noel
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Re: Proposed change in archery hunting regs for goats
Date: Wednesday, December 26, 2018 6:39:42 PM

I'm writing in opposition to opening the area between the Mendenhall River and Taku Inlet to archery hunting of goats. This area includes popular viewing spots for goats, including Mendenhall Lake and Mount Juneau/Roberts. Goat populations in these locales have only recently recovered from overhunting in the 1980s. Allowing hunting now may once again reduce the population to minimal numbers.

There are plenty of alternative hunting opportunities in the more remote parts of the Juneau area to accommodate goat hunters. The mountains and drainages north of Mendenhall river, for example, are open to hunting and accessible from the road system.

Jim Noel



Submitted By
jimi papoi
Submitted On
12/12/2018 11:26:02 AM
Affiliation

Phone
9077890705

Email
jmpapoi69@gmail.com

Address
po box 210751
po box 210751
auke bay, Alaska 99821

Good morning ADF&G,

I would like to voice my support for Lauri Jemison's proposal to reinstate trapping identification. I don't see how it would create an undue hardship to affix identification to their traps, and it allows more accountability for illegal activity. Crabbers and long-liners have to identify their buoys. Hunters and fishermen have to have their hunting and fishing license on us at all times to be able to identify us participating legally in the managed taking of our wildlife. It is applying the same logic of being able to validate our legal behavior both actively on our person, and also passively on gear left unattended. Having trappers identify their gear keeps them consistent with our other enforced requirements.



Submitted By
Megan
Submitted On
12/10/2018 1:29:48 PM
Affiliation

Phone
Rider
Email
Rider.meg@gmail.com
Address
800 f street unit g4
Juneau, Alaska 99801

To Whom It May Concern:

I am a strong proponent for reinstating the identification tags for traps and snares in Alaska. Hunters and trappers should be held accountable for unnecessary and inhumane suffering of a defenseless animal. We are better than this as a State.

Sincerely,

Megan Rider



Submitted By

Jeremy Sidney

Submitted On

12/27/2018 11:03:34 PM

Affiliation

Phone

9077230586

Email

jeremy.sidney12@gmail.com

Address

10412 crazy horse drive juneau alaska
juneau, Alaska 99801

i disagree with closing down public lands post the times the bus is on the road give the hunters more info honestly after this summer you need some thinning on the bear population, your gun free zone has cost a kid his life , it never should have happened the aggressive bears should have been shot at the first sign of a problem!



Submitted By

Kristine Trott

Submitted On

12/17/2018 4:51:12 PM

Affiliation

Juneau Advisory Committee to the Board of Fish & Game

Phone

907-321-1859

Email

krisstrott@gmail.com

Address

19150 Williwaw Way
Williwaw Way
Juneau, Alaska 99801

I have voted to put ID tags of some form on all traps in the Southeast areas. The country here is steep, very overgrown with dense brush and the trappers use the trails that all the hikers use. Hikers with dogs often allow their dogs free range when away from populated areas. Some dogs range further from where their owners are and are at risk of running into a trap. If there is a notice on the trail section where trapping is occurring, that hiker then can make sure they keep their dog closer and under more control.

There are also numerous times that trappers leave their equipment out past the trapping closure times and unfortunate incidents occur with either a dog or wild animal. The troopers have no way of knowing whom to contact to tell them to remove their gear or in the case of illegal, incidental trapping, whom to go after for their infraction.

I know sometimes a person can forget where they've placed all their gear and in those instances, a courtesy call can remind them to retrieve their traps before they run into trouble. As a crab fisherman commented to me, "We have to label our crab and shrimp pots with our permit numbers, why not land trappers as well?!"

I fully agree.



Submitted By
Eileen Wagner
Submitted On
12/24/2018 6:28:43 PM
Affiliation

Phone
907-209-9963

Email
eileenwwagner@gmail.com

Address
517 Kennedy St.
Juneau, Alaska 99801

I oppose the proposed elimination of the regulations regarding hunting of mountain goats on Mt. Juneau, bear baiting, and hunting wolves on Douglas. I have lived in downtown Juneau for 37 years, and am frequently hiking in the areas of Mt. Juneau, Mt. Roberts, and Douglas island. Obviously, it's thrilling to see these animals, and I want them to be protected for our enjoyment. But it's not just for us; this past summer I kept running into groups of out of state tourists, independent travelers, who had flown in after having read online about Juneau as a hiking destination. I probably met seven or eight separate groups of tourists who were staying for a week or so to hike our trails, and they were quite happy with their experience here. They were not cruise ship passengers who spend 3 hours in town and buy t-shirts. They come here because they no longer have natural trails and animals. We do, and must protect them.

Thank you.



Submitted By
Thomas Weske
Submitted On
12/27/2018 4:27:37 PM
Affiliation

Phone
9073212301

Email
tweske@gci.net

Address
9200 Emily Way
Juneau, Alaska 99801

I have lived in Juneau for 41 years and many of those years the weather kept me from travelling to Admiralty to hunt deer. I would on those occasions hunt on Douglas Island. On a full day outing I would see 2 to 6 deer. Often they would all be does so I would pass them up. The last few years I have seen less and less deer. This year none. For as long as I have lived here I have been under the impression that all the states game was managed for maximum yield and carrying capacity. It seems to me that is not the case on Douglas Island. One species (the wolf) has received preferential treatment. Are we going to continue to let the wolf population increase until the deer population is so low we have to close Douglas to deer hunting all together? I am a realist and understand that the only user group that can be controlled are humans because other predators don't read and wouldn't follow game regulations if they could. I would like to see the wolf harvest restrictions recinded and the wolves treated as they are in most of the rest of Alaska's game units.

Thank you for your consideration and the oppertunity to voice my opinion.



Submitted By
mary f. willson
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Affiliation

All trappers should be required to label their traps with ID, license numbers, and contact information, Shrimp and crab trappers do so. Those that trap land animals should do so too...it is certainly the RESPONSIBLE thing to do! It is very important to identify the owners of traps that catch non-target animals or have traps set out of season or in illegal areas. Similarly, it is important to curb the prolonged suffering endured by many trapped animals, an unnecessary cruelty caused by lazy and irresponsible trappers that give their occupation such a bad name. Without accountability, there is no way to follow up on bad practices (which is probably the whole idea behind this regrettable proposal). But accountability matters!